

<b>Streamlined Annual PHA Plan (Small PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 02/29/2016</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, 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.** Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer 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 of 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, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 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: _____ PHA Code: _____            PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performer            PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____            PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)            Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____            Total Combined _____            PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </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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Lead PHA:																											

<b>B.</b>	<b>Annual Plan Elements Submitted with 5-Year PHA Plans.</b> Required elements for all PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a PHA is not submitting its 5-Year Plan. See Section C for required elements in all other years (Years 1-4).
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Five-Year PHA Plan</b> submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p>
<b>B.2</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p>
<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>

<b>C.</b>	<b>Annual Plan Elements Submitted All Other Years (Years 1-4).</b> Required elements for all other fiscal years. This section does not need to be completed in years when a PHA is submitting its 5-Year PHA Plan.
<b>C.1.</b>	<p><b>New Activities</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.  <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.  <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.  <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.  <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p> <p>(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.</p> <p>(d) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<b>C.2</b>	<p><b>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</b></p> <p>Form 50077-SM, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, including Item 5 must be submitted by the PHA as an electronic attachment to the PHA Plan. Item 5 requires certification on whether 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.</p>
<b>D</b>	<b>Other Document or Certification Requirements for Annual Plan Submissions.</b> Required in all submission years.
<b>D.1</b>	<p><b>Civil Rights Certification.</b></p> <p>Form 50077-SM-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>D.2</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>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>
<b>D.3</b>	<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>
<b>E</b>	<b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
<b>E.1</b>	<b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.

# Instructions for Preparation of Form HUD-50075-SM Annual Plan for Small and High Performing PHAs

## A. PHA Information. All PHAs must complete this section.

**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. Annual Plan. PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

### B.1 Revision of 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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(2\)\(ii\)](#) and 24 CFR §903.12(b).

**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).

**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. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). ([24 CFR §903.7\(r\)\(2\)\(ii\)](#))

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 or Choice Neighborhoods.** 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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including name, 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; 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. The application and approval process for demolition and/or disposition is a separate process. 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))

**Conversion of Public Housing.** 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))

**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.

**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))

**C. Annual Plan.** PHAs must complete this section during years where the 5-Year Plan is not due. (24 CFR §903.12)

**C.1 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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

**Demolition and/or Disposition.** Describe any public housing 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; 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. The application and approval process for demolition and/or disposition is a separate process. 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))

**Conversion of Public Housing.** 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.** 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 under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](http://www.hud.gov/offices/pih/centers/sac/conversion.cfm)

**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).

**C.2 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 form HUD-50077 SM-HP.

**D. Annual Plan.** PHAs must complete this section in all years.

- D.1 Civil Rights Certification.** Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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\(o\)](#))
- D.2 Resident Advisory Board (RAB) comments.** If the RAB provided comments to 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](#))
- D.3 Certification by State or 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](#))

**E. Statement of Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR 903.7 \(g\)](#))

- E.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

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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. 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 16.64 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.

## Annual Plan Attachment

### **Section B.1 Annual Plan Element Proposed Changes FY18**

**Utilities (proposed):** The AAHC owns and manages 17 properties and the AAHC includes the water sewer and trash removal expenses in the rent. However, the gas and electric responsibility varies by property. Miller Manor and West Arbor are the only properties that also includes gas and electric in the rent. Baker Commons is the only property that includes gas in the rent, but electricity must be paid for by the tenant. All of the other properties require the tenant to contact DTE to put the gas and electric utilities in the tenant's name and the tenant pays those bills directly.

The AAHC is considering changing the utilities so that all of the utilities are paid for by the AAHC at all properties and the rent will be increased to include all the utilities. The AAHC typically has about 15 families at any given time that either cannot get DTE in their name due to previous non-payment or the tenants stop paying their utility bill and the utility gets shut off and is automatically turned on in the AAHC name instead. Because these tenants are currently required to have utilities in their name, if they are not able to get DTE to transfer the utilities back in their name, they can be evicted.

It does not make sense for the AAHC to evict people due to a utility shut-off if the AAHC can pay the utilities and include utilities in the rent. All tenants pay 30% of their gross adjusted income on rent and utilities, which is called the Total Tenant Payment (TTP). The TTP will not change for tenants. However, tenants will be paying their entire TTP to the AAHC instead of part of the TTP for rent and part of it for utilities. Consequently, tenants who currently receive a utility assistance payment from the AAHC to help pay for utilities will no longer get the utility payment, because the AAHC will be paying for all of the utilities.

There are pros and cons to this change. The pro is that tenants will no longer have their utilities shut-off and will no longer be evicted for not having utilities in their name. In the short-term, this change will cause additional work for the AAHC but in the long-term the income certification and rent determination will be streamlined because the entire TTP will be paid to the AAHC. And, the AAHC will no longer have to send out utility checks to tenants. The con is that there is no incentive for tenants to save energy costs and energy costs may be higher for the AAHC than tenants are currently paying.

Currently, the AAHC hires a consultant to determine the average utility usage by property and apartment size and each apartment is given a utility allowance. If a tenant conserves energy and the utility bill is lower than the utility allowance, then the tenant saves money. If the tenant's utility bill is higher than the utility allowance, then the tenant pays more on utilities than expected.

### **Moving To Work – Voucher & Public Housing Program (Proposed)**

The AAHC is considering applying to HUD to become a Moving To Work (MTW) agency. Congress has approved expansion of the program to 100 Public Housing Agencies. The following excerpts are copied from HUD's website:

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-

designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW gives PHAs exemptions from many existing public housing and voucher rules and more flexibility with how they use their Federal funds. MTW PHAs are expected to use the opportunities presented by MTW to inform HUD about ways to better address local community needs.

***What are MTW agencies permitted to do under MTW?***

PHAs selected for the demonstration are permitted to seek exemption from many existing Public Housing and Housing Choice Voucher program rules found in the United States Housing Act of 1937 in pursuit of the three MTW statutory objectives:

- Reduce cost and achieve greater costs effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

PHAs in the MTW Demonstration also have the flexibility to combine Federal funds from the public housing operating and modernization programs and Housing Choice Voucher program into a "block grant" to help them better meet the purposes of the demonstration and the needs of their communities.

While MTW agencies have considerable flexibility, they must still abide by all other federal rules and regulations, including the Fair Housing Act, the Civil Rights Act, labor standards, environmental rules, procurement guidelines, demolition and disposition procedures and relocation regulations. For all activities that affect their residents' rent payments, PHAs must also conduct an impact analysis that recognizes the unforeseen circumstances that may affect their residents and develop an appropriate hardship policy. These safeguards help minimize any potentially negative impact of MTW on residents and communities.

***The AAHC would like feedback from the Resident Advisory Board on the rules and regulations you would like the AAHC to consider changing that would make it easier to participate in our programs. We would like to know which program rules and regulations are the hardest to comply with.***

One of the changes we are considering is to provide a flat rent subsidy or a tiered rent subsidy to all eligible participants rather than changing the rent subsidy every time the tenant's income increases and decreases. This would eliminate or greatly reduce interim income certifications because once a tenant is eligible, the rent subsidy would either stay the same until the next annual income certification or require a significant change in income to change the rent subsidy. The AAHC believes this will streamline the process and provide greater incentive for tenants to increase their income.

The AAHC would also like to revise 3<sup>rd</sup> party verification requirements. Many third party verifications are difficult to secure, particularly from banks and higher education institutions. In addition, the AAHC is



considering a change to rent reasonable and payment standard requirements due to the high cost of housing in Washtenaw County, especially in the City of Ann Arbor, Ann Arbor Township, Saline, Chelsea and parts of Pittsfield Township.

<b>2018 Planned Financial Sources and Uses</b>		
<b>Federal Sources:</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
Public Housing Operating Funds	\$150,000	Public Housing Operations
Public Housing Capital Fund CFP501-17 Grant Estimated	\$80,000	RAD Conversion
Housing Choice Voucher/S8 HAP Grant	\$12,500,000	HCV and PBV HAP Expenses. Including RAD PBV and VASH
Housing Choice Voucher/S8 Admin Fees	\$1,200,000	S8/HCV Admin Expenses
Continuum of Care	\$1,500,000	Rent and Services
Family Self Sufficiency	\$138,000	Family Self Sufficiency program
Other (Interest Income, Fraud Recovery)	\$60,000	Restricted
<b>Non-federal sources (list below)</b>		
Tenant Rental Income	\$50,000	Housing Operations
City of Ann Arbor General Fund	\$343,000	Voucher Administration, Public Housing and Central Office
Other Revenue	\$700,000	Voucher Administration, Housing Development and Central Office
<b>Total resources</b>	<b>\$16,721,000</b>	

**Section B.2 and C.1 New Activities**

**Project-Based Vouchers**

The AAHC will be issuing a Request for Proposal for Project-Based Vouchers in 2018. The AAHC will project-base no more than 100 units in the City of Ann Arbor and in surrounding townships that are in the Ann Arbor Public School District. The goal is to increase the number of units in high opportunity/low poverty communities. The City of Ann Arbor, Ann Arbor Township, and parts of Scio and Pittsfield Townships are high opportunity areas within Washtenaw County that have very high rents, which makes it difficult for tenants with housing choice vouchers to find housing there. By project-basing vouchers in

these communities, low-income households will be able to live there. The AAHC will prioritize housing that targets 30% AMI and 50% AMI households and includes supportive services.

The following policies will be added to the Administrative Plan to ensure compliance with PIH Notice 17-21 related to HOTMA and PBV.

Definition of a project. The PHA may define a project as a single building, multiple contiguous buildings and/or as multiple buildings on contiguous parcels of land. The Administrative Plan currently does not include a definition of a project.

PHA Policy

The PHA defines a project as a single building, multiple contiguous buildings and multiple buildings on contiguous parcels of land.

**Additional Project-Based Units [FR Notice 1/18/17]**

The PHA may project-base an additional 10 percent of its units above the 20 percent program limit, if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302).
- Are specifically made available to house families that are comprised of or include a veteran.
  - *Veteran* means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

PHA Policy

The PHA will set aside units an additional 10 percent above the 20 percent program limit if:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302).
- Are specifically made available to house families that are comprised of or include a veteran.
  - *Veteran* means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

**PBV Units Selected Non-Competitively [FR Notice 1/18/17]**

PBV assistance may be attached to certain public housing projects without using a competitive process, where the PHA has an ownership interest or control and must be engaged in an initiative to improve, develop, or replace a public housing property or site. An ownership interest means that the PHA or its officers, employees, or agents are in an entity that holds any direct or indirect interest in the project in

which the units are located, including, but not limited to, an interest such as: titleholder; lessee; stockholder; member, or general or limited partner; or member of a limited liability corporation. For purposes of this authority, a PHA ownership interest also includes a scenario in which the PHA is the lessor of the ground lease for the land upon which the PBV project to improve, develop, or replace the public housing property is located or will be constructed.

In order to be eligible for this non-competitive exception the following conditions must be met:

- 1) The PHA must be engaged in an initiative to improve, develop, or replace the public housing properties or sites. The public housing properties or sites may be in the public housing inventory or they may have been removed from the public housing inventory through any available legal removal tool (which may include but is not limited to disposition or demolition under Section 18 of the Act, voluntary conversion under Section 22 of the Act, or required conversion under Section 33 of the Act) within 5 years of the date the unit/s were removed from IMS/PIC and the date on which the PHA entered into the AHAP or HAP pursuant to the non-competitive selection.
- 2) If the PHA plans rehabilitation or new construction, a minimum threshold of \$25,000 in hard costs per-unit is required.
- 3) Or, if a PHA plans to replace public housing by attaching project-based assistance to existing housing in which the PHA has an ownership interest or over which the PHA has control, then the \$25,000 per-unit minimum threshold does not apply as long as the existing housing substantially complies with HUD's housing quality standards. The PHA's Administrative Plan must describe what it means to "substantially comply with HUD's housing quality standards."
- 4) The PHA must explain in its Administrative Plan the work it plans to do on the property or site and how many units of PBV it plans to add.

This particular definition of PHA-owned is only applicable to this section on exception to the competitive process.

In order to be non-competitively selected under this provision, the units must be eligible for PBV assistance in accordance with 24 CFR 983.5, and the selection of the units must satisfy all other statutory and regulatory requirements of the PBV program. Unless otherwise exempt, units non-competitively selected under this section are subject to the program cap and income-mixing requirements and exceptions.

#### PHA Policy

The Ann Arbor Housing Commission plans to project-base vouchers without using a competitive process at the following projects that it is converting from public housing under the RAD program as de minimis units: West Washington, Oakwood, and Broadway. W. Washington has 2 units and the units were completely renovated in 2016 due to a fire. The AAHC does not plan on completing any renovations at W. Washington. Oakwood has 3 units and the units were completely renovated in 2015. The AAHC plans on re-grading the site and adding rain gardens and better drainage but does not plan on renovating any units at Oakwood. Broadway has 20 units and will require renovations which will include siding, windows, flooring, fixtures, insulation, cabinets, countertops, doors, re-paving the driveway, drainage, painting (including lead-based paint removal and remediation) and lighting. All of these units will fully comply with HUD's housing quality standards.

In addition, the AAHC will be project-basing vouchers without using a competitive process at the following projects that it is converting from public housing under the RAD program: White/State/Henry and Lower Platt. Both of these projects will be demolished and redeveloped with additional units for the purpose of improving the projects and adding affordable housing in a high cost, low poverty community. White/State/Henry has 28 units and 4 units will be added. Lower Platt has 4 units and 28 units will be added. All of these units will fully comply with HUD's housing quality standards.

Under 24 CFR 983.207(b) a HAP contract can be amended to add new units at any time during the term of the HAP contract without being subject to competitive selection procedures. The amendment is subject to all other PBV requirements including percentage limitation, income mixing requirement, rent reasonableness. The PHA may amend a PHV HAP contract to add units without competitive selection during the term of the initial contract or during the term of any extension of that contract. The amendment may also occur at the point of initial contract extension or at the point of any subsequent extension. However, the anniversary and expiration dates of the HAP contract term for the PBV units originally in place under the HAP contract. 24 CFR 983.58(c) [environmental review] does not apply when PBV units are added to a current PBV HAP contract.

#### PHA Policy

The AAHC will allow the following PBV HAP contracts to be amended and units added at any time that the AAHC has available funding by mutual agreement of the AAHC and the owner of the projects, because the AAHC was not able to award PBV units to all of the units in these projects that the owners applied for in 2015 when the AAHC previously issued a PBV Request for Proposal:

518-522 S. Division  
211 E. Davis  
610 W. Summit  
800 Stimson  
201 W. William  
100-102 Glendale  
112-114 Glendale  
1911-1913 Dexter  
1675 Broadway  
819 Third  
701 Miller  
31 Carrot Way  
1500 Pauline  
3033-3055 Valencia  
1217 W Huron  
532 N Main  
115 & 119 Glendale

125 & 127 Allen  
1010-1030 Arbordale  
2837-2855 Burton  
3335-3337 Platt  
2176 Hemlock  
2 Kilbrennan  
9 Rockland  
1504 – 1508 Broadway  
805 – 807 W Washington  
3565 -3585 Oakwood  
1521 State, 701 Henry, 1514 & 1520 White  
3401 – 3461 Platt  
900 S. Maple

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### **Organization of the PBV Waiting List [24 CFR 983.251(c)]**

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

#### PHA Policy

The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance if requested by the owner. The PHA currently has waiting lists for several PBV projects.

### **Refusal of PBV Offer [24 CFR 983.251(e)(3)]**

The PHA is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant's place on the tenant-based waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

#### PHA Policy

If a family refuses an offer of PBV assistance, the family will only be removed from the PBV waitlist from which the family is pulled. The family will not be removed from any other waitlists.

**Utility Reimbursements for PBV units**

If the amount of the utility allowance exceeds the total tenant payment, the PHA must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant rent to the owner must be zero.

The PHA may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If the PHA chooses to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier.

PHA Policy – TO BE DELETED to enable payments to family or utility supplier

The PHA will make utility reimbursements to the family.

**Conversion of Public Housing under the Rental Assistance Demonstration Program:** The AAHC is continuing to convert 100% of its properties under the RAD program to project-based vouchers. Below is the plan for each property site:

RAD Project	Public Housing Property Name	Property Type	Current				Net Change (from Public Housing to RAD)
			Public Housing Units	Proposed Total Units	Proposed RAD Units	Proposed Non-RAD Units	
Phase 1	S. Seventh	Family	8	8	8	-	-
	Hillside	Family	6	6	6	-	-
	Mallet's Creek	Family	6	6	6	-	-
	Upper Platt	Family	5	5	5	-	-
	Evelyn Court	Family	1	-	-	-	(1)
Phase 2	S. Maple	Family	29	29	29	-	-
	Miller	Family	103	106	91	15	(12)
Phase 3	N. Maple Estates	Family	19	42	27	15	8
	N. Maple Duplexes	Family	4	4	4	-	-
Phase 4	Lower Platt	Family	4	32	12	20	8
	White/State/Henry	Family	28	32	32	0	4
	Oakwood	Family	3	3	0	3	(3)
	W. Washington	Family	2	2	0	2	(2)
Phase 5	Green Baxter	Family	23	23	23	-	-
	Baker	Family	64	64	64	-	-
	Hikone	Family	29	29	29	-	-
Phase 4	Broadway	Family	20	20	0	20	(20)

<b>Total Units</b>	<b>354</b>	<b>411</b>	<b>336</b>	<b>75</b>	<b>(18)</b>
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*The conversion of public housing units under RAD to Voucher units, either under the project-based voucher (PBV) program will shift the converted units into a different regulatory program. As a result, the RAD converted units will no longer be subject to public housing portions of our agency's annual plans. They will, however, become subject to the rules of the applicable voucher program, as modified by a few rules specific to RAD converted units.*

*Below is an update on the status of these 5 RAD projects:*

**Phase 1 – South Seventh, Hillside, Mallet’s Creek, Upper Platt, Evelyn – Family Developments**

Completed. Evelyn was purchased by Habitat for Humanity of Huron Valley

**Phase 2 – South Maple, Miller Properties – Family Developments**

Completed

**Phase 3 – North Maple Estates, North Maple Duplexes - Family Developments**

Completed – Renamed West Arbor

**Phase 4 –White/State/Henry, Lower Platt, Oakwood, W. Washington, Broadway - Family Developments**

Under the RAD conversion of the Phase 4-properties, 32 current public housing units will be demolished and replaced with 64 affordable housing units including 44 RAD units and 20 project-based voucher units. W. Washington & Oakwood will be de minimis and Broadway will transfer its RAD subsidies to White/State/Henry and Lower Platt. Broadway will no longer be public housing, but the AAHC will project-base vouchers on the property so that existing residents can continue living there.

**\*\*NOTE:** The AAHC received Low Income Housing Tax Credits to redevelop Phase 4 in January 2018 and expects development to be completed by 2020.

**Phase 5 – Baker Commons, Hikone, Green-Baxter Court – Family Developments**

Completed

**Demo/Dispo - Broadway**

Broadway will no longer be a potential Demo/Dispo.

**Turnkey III: - Garden**

The AAHC has one house on Garden Circle that was previously in the Turnkey III program, which no longer exists. The AAHC will be officially removing this house from PIC with HUD but will continue to operate it as affordable housing through the voucher program.

### **Section B.5 Progress Report**

*Please see the 4 goals from FY 15 – FY 19 Plan with a progress report for each goal*

- 1) *Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project*

*The AAHC has been approved by HUD to redevelop all of its public housing to project based vouchers under the RAD program. Phase 1, 2, 3 & 5 are completed. Phase 4 is seeking financing.*

- 2) *Develop new affordable housing*
  - a. *At existing public housing sites*
  - b. *New properties*

*The AAHC received site plan approval for 3 RAD properties to demolish and build new housing. The Phase 3 location at N. Maple added 23 apartments. The Phase 4 location at White/State/Henry will be adding 4 apartments and the Phase 4 location at Lower Platt will add 28 more apartments. When Miller Manor was redeveloped, 3 apartments were added.*

- 3) *Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation.*
  - a. *Issue a Request for Proposal for to project-base up to 20% of the AAHC's budget authority in order to de-concentrate poverty and expanding housing and economic opportunities for very low-income and special needs households in the City of Ann Arbor. It is projected that about 200 vouchers will be converted to project-based vouchers.*

*The AAHC issued a RFP to project-base vouchers in the City of Ann Arbor and received applications for 218 project based vouchers and approved 183 units. The AAHC will be issuing another Project-Based Voucher RFP in 2018 for up to 100 vouchers.*

- 4) *Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.*
  - a. *Increase support services for tenants in affordable housing and voucher program*
  - b. *Through community partnerships*
  - c. *Additional funding sources*

*The AAHC partnered with Avalon Housing, Ozone House, and Washtenaw County Community Mental Health to provided housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. The partners applied for funding to house and provide services for 129 households and were awarded \$1,690,235 in annually renewable funding for 129 households in FY16. A minimum of 59 of these households will be housed at AAHC properties and Avalon, WCCMH and Ozone*



House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor.

The AAHC is partnered with SOS to hire a case manager to help AAHC voucher tenants to help them to maintain their vouchers. The program received funding from Religious Action for Affordable Housing (RAAH) and Coordinated Funding to hire a full-time case manager for a 2-year PILOT program starting in 2016. Funding was renewed for 2018 & 2019 through Coordinated Funding.

The AAHC partnered with Avalon Housing & Peace Neighborhood Center to provide on-site services for tenants at West Arbor.

The AAHC is partnering with CAN (Community Action Network) to apply for funding to provide on-site services at the new Lower Platt Community Center.

The AAHC is partnering with Avalon and WCCMH to apply for funding to provide on-site services at the new White/State/Henry Community Center.

## **Section D.2 Resident Advisory Board**

The Resident Advisory Board (RAB) will meet on January 24, 2018 to discuss proposed changes to the Administrative Plan for the Voucher Program and the ACOP for Public Housing. Members who attended the meeting were:

B. Pryor, B. Hill, J. Turner, L. Cooper, M. Doyle, D. Boston, S. Ellinger, J. Majors, N. Bridgman, T. Batalonga, L. Robertson, N. Hudgins, R. Cline, J. Kane

- 1) RAB Input regarding changing utilities to include DTE electric and gas into the rent.** There were only 2 RAB members in attendance that would be affected by this proposal and one member was fine with the AAHC making this change and the other member was concerned that it would reduce their Michigan Home Heating Credit on their taxes.

**AAHC response:** The Michigan Home Heating Credit can be utilized when the rent includes utilities. However, the amount that is refunded will likely be different than the amount refunded when using actual utility bills because it uses a formula to calculate the refund. The AAHC would like to note that the AAHC completed a couple sample MI Home Heating Credit tax returns to understand the impact. The credit is higher for households with high heating costs that they pay directly utilizing the alternative credit formula. If a family uses the standard formula, then the home heating credit is twice as high for a family paying the heating bill directly than if it is included in the rent. Therefore, it is financially advantageous to families to pay their own heating bills if they are eligible for the Michigan Home Heating Credit.

- 2) RAB input regarding the Moving To Work Program.** There was a lively discussion about the MTW program. The AAHC explained what the program was and asked RAB members to let us know what regulations they would change if they could? A summary of the questions, suggestions and complaints are listed below.

Several tenants talked about how discouraging and difficult it was to adjust to income and rent increases. They thought that 30 days-notice is too short a time to increase their portion of the rent and one person suggested 90-days notice instead. People were discouraged by how hard it was to save when their income increased, because the rent increased too. Several people suggested that instead of charging 30% of tenant income on rent and utilities, that we should charge 20% of their income toward rent and consider putting 10% into a savings account for the tenant, similar to FSS even if they were not participating in FSS. However, RAB members were generally distrustful of banks because of the fees that banks charge and did not want to have a savings account with a bank. They asked if the AAHC could have a savings account and pay interest. The AAHC does not have the capacity to open savings accounts for tenants and track interest.

Another common request was to provide more time than 2 weeks to return information to the AAHC at the annual recertification. The AAHC noted that the AAHC starts the process generally 120 days prior to the annual recertification date. The AAHC may send a letter out asking for items to be returned within 2 weeks so that the process can keep moving forward and it can be completed within the 120 days.

The AAHC asked what the RAB thought about only providing their most recent Tax Return to conduct the annual income certification instead of providing all new documentation from all 3<sup>rd</sup> parties. Some RAB members thought this was a good idea. Others were worried that if their income went down from the previous year, then they would not get the benefit of decreased rent. Several RAB members agreed that this could help incentivize tenants to increase their income each year.

The RAB wanted to learn more about the Family Self-Sufficiency (FSS) program which the AAHC explained. One RAB member suggested that the FSS program allow them to draw down funds from their escrow if needed, rather than wait until graduation.

One member suggested and several RAB members agreed that it is hard for families when the AAHC includes the income of young adult children who are just starting out in the world and are transitioning out of the home. It is difficult for parents to ask their children to give them money for rent. It was suggested that 18 – 23 year olds should not have their income included in the household. And it was requested that a young adult be allowed to get a voucher when they leave the parents household.

The RAB had questions about work requirements. The AAHC explained that there are exceptions for households who are elderly and/or disabled.

There was a discussion about providing a basic rent subsidy, regardless of income or a gradually declining fixed rent subsidy, that was based on how long a person was in the program, not based on their income. Although some RAB members could see how this could be an incentive to work and increase their income so that they could be self-sufficient, others were afraid they would lose this rent safety net if their income declined for some reason.

RAB members asked the AAHC to revise their paperwork so that they did not have to fill out their name, date of birth, social security number and address on every form they fill out. The AAHC agreed to review the forms and revise them whenever the can. Some forms might have regulatory reasons for the format that might not be able to be changed.

In addition to these specific items regarding Moving the Work, the RAB members asked questions about how project-based vouchers and how the waitlist for project-based vouchers works. RAB members were concerned about the federal budget process and funding because there is such a high need for subsidized housing and it keeps getting cut. RAB members also stated that it was very difficult to find housing that is affordable in Ann Arbor.

**OTHER RESIDENT INPUT:**

K. Pitts indicated that it is better for her to pay her own utilities in case she needs assistance from a local agency to pay, she believes she would need a copy of the utility bill.

**Civil Rights Certification**  
*(Qualified PHAs)*

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 02/29/2016

**Civil Rights Certification**

**Annual Certification and Board Resolution**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Ann Arbor Housing Commission

MI064

PHA Name

PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official  
Jennifer Hall

Title      Executive Director

Signature



Date      3/16/2018

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Gregory Dill, the County Administrator  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Ann Arbor Housing Commission

*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

Washtenaw County

*Local Jurisdiction Name*

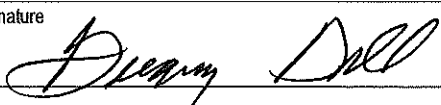
pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Ann Arbor Housing Commission Plan includes plans to improve housing for low-income residents. The

Ann Arbor Housing Commission's Plan is consistent with the County's Analysis to Impediments to Fair Housing

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Gregory Dill	County Administrator
Signature	Date
	03/16/2018

**Certification of Compliance with  
PHA Plans and Related Regulations  
(Small PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plans and Related Regulations  
including Civil Rights and PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or \_\_\_ Annual PHA Plan for the PHA fiscal year beginning \_\_\_\_\_, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):
  - \_\_\_ 903.7a Housing Needs
  - \_\_\_ 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
  - \_\_\_ 903.7c Financial Resources
  - \_\_\_ 903.7d Rent Determination Policies
  - \_\_\_ 903.7h Demolition and Disposition
  - \_\_\_ 903.7k Homeownership Programs
  - \_\_\_ 903.7r Additional Information
    - \_\_\_A. Progress in meeting 5-year mission and goals
    - \_\_\_B. Criteria for substantial deviation and significant amendments
    - \_\_\_C. Other information requested by HUD
      - \_\_\_1. Resident Advisory Board consultation process
      - \_\_\_2. Membership of Resident Advisory Board
      - \_\_\_3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
  6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
  7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
  8. For a PHA Plan that includes a policy for site based waiting lists:
    - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
  17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
  19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  21. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).


\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
PHA Number/HA Code

\_\_\_\_\_ 5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_\_

\_\_\_\_\_ Annual PHA Plan for Fiscal Year 20\_\_\_\_\_

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Signature 	Date

**Capital Fund Program---Five-Year Action Plan**

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011**

<b>Part I: Summary</b>							
ANN ARBOR HOUSING COMMISSION/MI064		ANN ARBOR/WASHTENAW/MICHIGAN			<input checked="" type="checkbox"/>	Original 5-Year Plan	Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 17 CY 2016 Grant	Work Statement for Year 2 FFY 18 CY 2017 CFP Grant	Work Statement for Year 3 FFY 19 CY 2018 CFP Grant		Work Statement for Year 4 FFY 20 CY 2019 CFP Grant	Work Statement for Year 5 FFY 21 CY 2020 CFP Grant
B.	Physical Improvements Subtotal	<b>Annual Statement</b>	\$ 81,000	\$ 81,000	-	\$ -	\$ -
C.	Management Improvements		\$ -	\$ -		\$ -	\$ -
D.	PHA-Wide Non-dwelling Structures and Equipment		\$ -	\$ -		\$ -	\$ -
E.	Administration		\$ -	\$ -		\$ -	\$ -
F.	Other		\$ -	\$ -		\$ -	\$ -
G.	Operations		\$ -	\$ -		\$ -	\$ -
H.	Demolition		\$ -	\$ -		\$ -	\$ -
I.	Development		\$ -	\$ -		\$ -	\$ -
J.	Capital Fund Financing-Debt Service		\$ -	\$ -		\$ -	\$ -
K.	Total CFP Funds		\$ 81,000	\$ 81,000	-	\$ -	\$ -
L.	Total Non-CFP Funds						
M.	Grand Total		\$ 81,000	\$ 81,000	-	\$ -	\$ -



**Capital Fund Program---Five-Year Action Plan**

**U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011**

<b>Part I: Summary</b>							
ANN ARBOR HOUSING COMMISSION/MI064		ANN ARBOR/WASHTENAW/MICHIGAN			<input checked="" type="checkbox"/>	Original 5-Year Plan	Revision No:
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		<b>Annual Statement</b>					
B.	MI064100-West Side	\$ -	\$ -	\$ -		\$ -	\$ -
B.	MI064200-East Side	\$ 81,000	\$ 81,000	\$ -		\$ -	\$ -
C.	Management Improvements	\$ -	\$ -	\$ -		\$ -	\$ -
D.	PHA-Wide Non-dwelling Structures and Equipment	\$ -	\$ -	\$ -		\$ -	\$ -
E.	Administration	\$ -	\$ -	\$ -		\$ -	\$ -
F.	Other	\$ -	\$ -	\$ -		\$ -	\$ -
G.	Operations	\$ -	\$ -	\$ -		\$ -	\$ -
H.	Demolition	\$ -	\$ -	\$ -		\$ -	\$ -
I.	Development	\$ -	\$ -	\$ -		\$ -	\$ -
J.	Capital Fund Financing-Debt Service	\$ -	\$ -	\$ -		\$ -	\$ -
K.	Total CFP Funds	\$ 81,000	\$ 81,000	\$ -		\$ -	\$ -
L.	Total Non-CFP Funds						
M.	Grand Total	\$ 81,000	\$ 81,000	\$ -		\$ -	\$ -







