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| Streamlined Annual PHA Plan <i>(High Performer PHAs)</i> | U.S. Department of Housing and Urban Development Office of Public and Indian Housing | OMB No. 2577-0226 Expires 03/31/2024 |
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PUBLIC NOTICE

PROPOSED FISCAL YEAR 2022 PUBLIC HOUSING AGENCY (PHA) ANNUAL PLAN

Notice is hereby given that the City of Dubuque Housing Commission will conduct a public hearing on Tuesday, April 12, 2022 at a meeting to commence at 4:00 p.m. at the Housing and Community Development Department, 350 West 6th Street, City Council Chambers, in Dubuque. To join this meeting by phone dial (Toll Free) 877 309 2073 and enter access code 504-472-637. To join this meeting virtually visit <https://meet.goto.com/504472637> and join from your computer, tablet, or smartphone.

The Commission will consider a proposed Fiscal Year 2022 PHA Annual Plan.

Interested parties may examine the contents of the proposed Plan at the City Clerk’s Office, City Hall, 50 West 13th Street; and the Housing and Community Development Department, 350 West 6th Street, Suite 312, Dubuque Iowa, and the City Website at www.cityofdubuque.org/adminplan.

Written comments may be submitted on or before the time of the public hearing to the City of Dubuque Housing and Community Development Department, 350 W 6th St, Suite 312, Dubuque Iowa 52001 (563-690-6096) or ghodgson@cityofdubuque.org.

At said time and place of public hearing all interested citizens and parties will be given an opportunity to be heard for or against said plan.



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: <u>City of Dubuque</u> PHA Code: <u>IA087</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>0</u> Number of Housing Choice Vouchers (HCVs) <u>1,108</u> Total Combined <u>1,108</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><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </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: | | | | | | | | | | | | | | | | | |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>B.1</p> | <p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p> |
| <p>B.2</p> | <p>New Activities.</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 checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" 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> |
| <p>B.3</p> | <p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p><u>PHA Goal: Meet the need for quality, affordable rental homes</u></p> <p>Sub Goal: Preserve, rehabilitate, and promote quality affordable housing.</p> <p>Continue efforts to affirmatively further fair housing through licensing and tiered inspections process – In an effort to affirmatively further fair housing, the City of Dubuque continues to collect voucher acceptance and vacancy data for every licensed rental property in the city through the annual licensing renewals. This is done in order to assess availability and access to units for voucher holders. Additionally, property owners may request information on the voucher program via their renewal paperwork, creating an opportunity for property owner engagement and education. We are in the process of creating a Landlord Education video as well, highlighting the process of renting to HCV clients. Our code enforcement policies are structured to give more attention to properties that persistently fail inspections. Enhanced enforcement efforts allow us to focus energy on the properties and property owners that have experienced the most deferred maintenance. Often this impacts low-income renters, by proactively addressing nuisance property owners and has resulted in more frequent inspections, better maintained, and safer units.</p> |

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| B.4. | Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. |
| B.5 | <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> |
| C. Other Document and/or Certification Requirements. | |
| C.1 | <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 checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> |
| C.2 | <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, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> |
| C.4 | <p>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?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p> |

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing.
 Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

PHA Goal: Increase the Acceptance of Housing Choice Vouchers by Housing Providers

Sub Goal: Reduce negative community perceptions of poverty that impacts fair housing and access to opportunity for low-income residents

- Complete an Equitable Poverty Prevention Plan and implement recommendations – In fiscal year 2020 the City hired a consultant to oversee the development of the Equitable Poverty Prevention Plan. Multiple avenues of research and community engagement assisted in the creation of the final plan that was presented to the City Council in January 2021. Recommendations from that plan were used as guiding principles to form budget requests and guide resource enhancements in the community. The City created an Office of Shared Prosperity as a new department with a focus on neighborhood equitability and inclusion. Fiscal Year 2022 will allow this department to implement some of the recommendations as well as frame the planning for future years.
- Continue efforts of re-branding the HCV Program adopted by City Council as an alternative to a Source of Income Ordinance – In fiscal year 2020 the City focused on researching ways to incentivize landlords to accept HCV program vouchers. We are still implementing efforts to increase landlord education surrounding the HCV program, a landlord education video production is currently underway. We implemented landlord incentives in fiscal year 2021 but did not see a substantial increase in landlord participation despite these efforts.
- Implement communication and trust-building activities for landlords and HCV program participants – In fiscal year 2021 City staff continued to meet with the Landlord Association monthly to trouble shoot the reasons for low participation numbers and portray an accurate picture of available units willing to accept HCV payments. Educational outreach, direct deposit payments and landlord portal access continue to be utilized and help to recruit and gauge interest in program participation by landlords. As mentioned above, we did implement landlord incentive programs, but we saw no substantial increase in landlord participation even when directing additional resources specifically to the landlord population.

Sub Goal: Streamline processes that create barriers for housing providers to accept vouchers.

- Produce online briefing to increase awareness of tenant responsibility - The online briefing was created and went live in the summer of 2020. This has allowed the process to be more streamlined and convenient for clients to do at their leisure within a specific time frame and has allowed many to lease up at a quicker rate due to the ease of accessibility. This continued to be a pivotal asset in 2021 due to the COVID-19 Pandemic and the health risk implications face to face meetings imposed.
- Update Voucher Payment Standards and review exception rent areas to maximize payments to match the market – The Voucher Payment Standards (VPS) were evaluated and updated in October 2021 and again in December 2021, with most current amounts being put into effect 1/1/2022. Below are the VPS charts. Chart #1 shows original VPS amounts from 10/01/2020 and chart #2 shows the updated VPS amounts that went into effect as of 01/01/2022.

Chart #1: ALL OTHER AREA PAYMENT STANDARD- Effective 10/01/2020:

| | | | | | | | |
|--------------------------|-------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| Voucher Payment Standard | <u>SRO</u> 390 | <u>0BR</u> 545 | <u>1BR</u> 665 | <u>2BR</u> 880 | <u>3BR</u> 1120 | <u>4BR</u> 1376 | <u>5BR</u> 1582 |
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|---|-------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| FMR (Fair Market Rent) Effective 10/01/2020 | <u>SRO</u> 399 | <u>OBR</u> 532 | <u>1BR</u> 612 | <u>2BR</u> 806 | <u>3BR</u> 1065 | <u>4BR</u> 1376 | <u>5BR</u> 1582 |
|---|-------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|

Chart #2: ALL OTHER AREA PAYMENT STANDARD- Effective 01/01/2022:

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|---|-------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| Voucher Payment Standard | <u>SRO</u> 416 | <u>OBR</u> 600 | <u>1BR</u> 695 | <u>2BR</u> 915 | <u>3BR</u> 1220 | <u>4BR</u> 1427 | <u>5BR</u> 1641 |
| FMR (Fair Market Rent) Effective 10/01/2021 | <u>SRO</u> 416 | <u>OBR</u> 554 | <u>1BR</u> 634 | <u>2BR</u> 834 | <u>3BR</u> 1112 | <u>4BR</u> 1427 | <u>5BR</u> 1641 |

Exception Area Payment Standards were also updated as of 01/01/2022. The below charts show the previous Exception Area Payment Standards (effective 11/17/2020) as well as the updated Exception Area Payment Standards (effective 01/01/2022). No longer group exception area payment standard by census tract, updated amounts are by zip code. Exception area payment standards are in effect for 52002 & 52003 zip codes only.

Chart #1: EXCEPTION AREA PAYMENT STANDARDS – Effective 11/17/2020:

Census Tracts 8.01, 8.02, 12.01, 12.02, 12.04 & 12.05

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|---------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| Exception Rents VPS | <u>OBR</u> 623 | <u>1BR</u> 718 | <u>2BR</u> 946 | <u>3BR</u> 1249 | <u>4BR</u> 1614 | <u>5BR</u> 1857 |
|---------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|

Chart #2: EXCEPTION AREA PAYMENT STANDARDS – Effective 01/01/2022:

Zip Code 52002 & 52003 ONLY

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|---------------------|-------------------|-------------------|--------------------|--------------------|--------------------|--------------------|
| Exception Rents VPS | <u>OBR</u> 660 | <u>1BR</u> 760 | <u>2BR</u> 1000 | <u>3BR</u> 1330 | <u>4BR</u> 1700 | <u>5BR</u> 1920 |
|---------------------|-------------------|-------------------|--------------------|--------------------|--------------------|--------------------|

Due to Exception Area Payment Standards changing coverage areas from Census Tract to Zip Code, a portion of Census Tract 12.01 that was formerly in the Exception area consists of 52001 Zip Codes. Since 52001 is not an exception area, the VPS are gradually being decreased in order to stager the hardship imposed by changing the Exception Area Payment Standards coverage areas. The below charts show the previous Exception Area Payment Standards (effective 11/17/2020) when Census Tract 12.01 was in the Exception Area Payment Standard coverage area as well as the updated Exception Area Payment Standards (effective 01/01/2022) for those with zip codes 52001 that are also located within the 12.01 census tract after 52001 Zip Code is no longer considered an Exception Area.

Chart #1: EXCEPTION AREA PAYMENT STANDARDS – Effective 11/17/2020:

Census Tracts 8.01, 8.02, 12.01, 12.02, 12.04 & 12.05

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|---------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| Exception Rents VPS | <u>OBR</u> 623 | <u>1BR</u> 718 | <u>2BR</u> 946 | <u>3BR</u> 1249 | <u>4BR</u> 1614 | <u>5BR</u> 1857 |
|---------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|

Chart #2: EXCEPTION AREA PAYMENT STANDARDS – Effective 01/01/2022:

Zip Code 52001 – Former Census tract 12.01

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|---------------------|-------------------|-------------------|-------------------|--------------------|--------------------|--------------------|
| Exception Rents VPS | <u>OBR</u> 600 | <u>1BR</u> 695 | <u>2BR</u> 915 | <u>3BR</u> 1220 | <u>4BR</u> 1467 | <u>5BR</u> 1687 |
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Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

PHA Goal: Implement local government policies that encourage equity and decrease disparate impacts

Sub goal: Conduct audits to decrease disparate impacts

- Audit background check process from local ordinance requirements - In fiscal year 2020 the City began researching background check processes. The City runs free background checks for landlords on prospective tenants for the HCV program. Feedback received showed that these reports were confusing and could be adversely affecting tenants. We had cross-departmental staff examine the documents that housing providers receive, and most people were unable to read them correctly; According to HUD guidance and the Analysis of Impediments – best practice was not to rely on arrests in making rental decisions due to potential disparities and bias. While we did not have a way to know how each landlord used the information, we determined that we were likely contributing towards bias and inequity and stopped this practice. On October 22, 2020, arrest records were removed from the landlord background checks provided by the City. This continues to be our procedure. The background checks were reviewed again in April 2021 to ensure compliance with new forms.
- In the Fall of 2021, the City released an emergent RFP for new HCV software. A new software to manage the HCV caseload and expenditures in being implemented and will be live in the Spring of 2022. This new software will allow additional metrics and data to be available to assist in the analysis of community needs and barriers.
- Efforts continue to translate all necessary documents into Spanish and Marshallese in order to break down communication barriers and allow easier accessibility to programs and information for the entire community.
- Efforts increased to create more social media presence to engage the community through education and awareness. A landlord education video is in the process of being produced. City staff is also researching the potential benefits of offering a tenant education course.

Sub Goal: Analyze data to increase equity

- Implement quarterly review of eviction data for disparate impacts – We will not be able to track this data due to the lack of capability in the County Offices to support reporting. We will continue to work with individuals and complaints about wrongful evictions at this time.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

PHA Goal: Increase access to opportunity and the building of social capital

Sub Goal: Evaluate barriers that still exist, preventing residents from earning a livable wage, and address barriers to success.

- Join the Childcare Initiative to find ways to fund/provide childcare without 2 year waiting periods – In fiscal year 2021 we participated in many of the Childcare Coalition meetings in order to help generate ideas and identify potential barriers, resources, and solutions to assist parents in their goals of balancing a family and a career.
- Address food deserts and find ways to provide healthy, affordable food to lower income residents - In fiscal year 2021 the entire community came together to provide food for students when schools closed in the spring due to the COVID-19 outbreak. Many organizations worked together to provide food to those in need and through those efforts the overall need for food assistance in the community was very profound. Continuing this food assistance and identifying a long-term sustainable plan to provide for families in the community is now a focus of the City and many non-profits in the area. This is a work in progress. The City also has a Sustainability Coordinator that was just granted additional funding to add a summer intern, it is a goal for that department to do some additional work to address the food deserts in the community.

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\(i\)](#))

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.

C.1. RAB Meeting Minutes:

**Resident Advisory Board Meeting Minutes
4/13/2022**

Present: Pattie Breitbach

Staff: Crystal Kilgore
Dawn DeMaio
Tracy Doyle
Hollie Ohnesorge
Ryan Feller

Topic: PHA Annual Plan Review

Hollie Ohnesorge called the meeting into order by 11:01 am. Hollie defined the purpose of the PHA annual plan and how the RAB impacts the annual plan and who reviews it afterwards.

Hollie described the PHA's current goals (identified in the PHA 5-year plan) and how those goals were being achieved throughout the City's fiscal year 2021 & the beginning of the City's fiscal year 2022. The goals presented were: Meet the need for quality, affordable rental homes; Increase the acceptance of Housing Choice Vouchers by Housing Providers; Implement local and government policies that encourage and decrease disparate impacts; Increase access to opportunity and the building of social capital.

Key points made to address the above goals included the actions that came from the Equitable Poverty Prevention Plan which City Council approved in January 2021. As a result of the study, the City created the Office of Shared Prosperity Department. The City will continue efforts to rebrand to HCV program through a process of trust building and education with landlords. Hollie discussed changes regarding the online briefing that was rolled out in the summer of 2020. Also highlighted was the fact that the Voucher Payment Standards have been updated to reflect the current housing market. HUD has recently changed the way Exception Rent Areas are determined, requiring the exception rent areas be determined based on zip code rather than the former classification done by census tract. Hollie also informed the RAB of the new HCV software implementation underway, allowing for greater metrics and data collection. Community outreach continues through a heavy social media presence in order to engage and educate. Accessibility and accommodations are also consistently done through online briefings, virtual or in person meetings by request, as well as the translation of essential documents in English, as well as Spanish and Marshallese.

No questions or comments about the annual plan

Minutes prepared by Crystal Kilgore