

Annual PHA Plan (Standard PHAs and Troubled PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires: 02/29/2016

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-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, 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 **PHA Name:** Memphis housing Authority **PHA Code:** TN_001
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/01/2022
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 2110 **Number of Housing Choice Vouchers (HCVs)** 8447 **Total Combined Units/Vouchers**
10,557
PHA Plan Submission Type: ☐ Annual Submission ☒ Revised Annual Submission (Significant Amendment)

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

Information for the Annual and 5-Year Plan are found on the Memphis Housing Authority website-www.memphishas.org and on the fourth floor of the Benjamin L. Hooks Library, 3030, Memphis, TN 38111

TN 1-13 Barry Towers 255 Lauderdale St. (38105)

TN 1-14 Venson Center 439 Beale St. (38103)

TN 1-18 Jefferson Square 741 Adams Ave. (38105)

TN 1-21 Montgomery Plaza 1395 Pennsylvania St. (38106) TN 1-23 Borda Towers 21 Neely St. (38105)

TN 1-55 Bishop G.E. Patterson Pointe (Fowler Multi-family) 886 Latham (38126)

TN 1-76 Kefauver Terrace

7620 Robinson Cove (38002)

The following sites have been converted to RAD:

TN 1-43 College Park Senior 838 Walker Ave (38126)

TN 1-44 College Park Fam I 838 Walker Ave (38126)

TN 1-46 College Park Fam II 990 College Park Drive (38126)

TN 1-51 Askew Place 439 Lauderdale St. (38126)

TN 1-47 Uptown Square 534 N. Second Street (38105)

TN 1-49 Uptown Phase II 534 N. Second Street (38105)

TN 1-58 Uptown Phase III 534 N. Second Street (38105)

TN 1-59 Uptown Phase IV 534 N. Second Street (38105)

TN 1-47 Upton Square 534 N. Second Street (38105)
TN 1-48 Greenlaw Apts. 148 Mill Ave. (38105)
TN 1-50 Metropolitan Place 374 Mills Ave. (38105)
TN 1-53 Crockett Place 2645 Daves Drive (38127)
TN 1-54 Latham Terrace 855 South Fourth St. (38126)
TN 1-56 Magnolia Terrace 669 N. Third (38107)
TN 1-57 University Place Sr. 600 Somerville (38104)
TN 1-60 University Place Phase II 1045 EH Crump Blvd (38104)
TN 1-61 Harold Ford Villas 621 Deerskin Dr. (38109)
TN 1-62 Austin Park 4351 LeClaire Dr. (38109)
TN 1-64 University Place Phase III 1045 EH Crump Blvd (38104)
TN 1-65 Legends Park East 198 N. Pauline (38105)
TN 1-66 Lakeview Landing 3915 Dagan Dr. (38109)
TN 1-67 Levi Landing 915 Dagan Dr. (38109)
TN 1-68 Village at Cypresswood 4495 Horn Lak e Rd. (38109)
TN 1-69 Lyons-Ridge Sr. Apts. 1633 Pennsylvania (38109)
TN 1-70 Legends Park West 295 West Red Sox Lane (38105)
TN 1-72 Fairway Manor 12 W. Fairway (38109)
TN 1-71 Legends Park North 295 West Red Sox Lane (38105)
TN 1-72 Fairway Manor 12 W. Fairway (38109)
TN 1-73 Cleaborn Pointe Senior 460 South Lauderdale (38126)
TN 1-74 Cleaborn Pointe Phase II 440 South Lauderdale (38126)
TN 1-75 Cleaborn Pointe Phase III 440 South Lauderdale (38126)
TN 1-77 Cleaborn Pointe Phase IV 440 South Lauderdale (38126)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

- | Y | N | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Statement of Housing Needs and Strategy for Addressing Housing Needs |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| <input type="checkbox"/> | <input type="checkbox"/> | Financial Resources. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Rent Determination. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Operation and Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Grievance Procedures. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Homeownership Programs. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Community Service and Self-Sufficiency Programs. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Safety and Crime Prevention. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pet Policy. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Asset Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Substantial Deviation. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Significant Amendment/Modification |

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

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

1. Statement of Housing Needs

The Memphis Housing Authority actively works with the City of Memphis, Shelby County Government, and the State of Tennessee through the Tennessee Housing Development Agency (THDA) to address the housing needs of people. Using a combination of formula and competitive grants from the federal and state governments and private foundations, as well as private/public partnerships' the goal of local government and MHA is to create quality affordable housing and eradicate slum and blight while providing economic opportunities for the people of the community.

As identified, in the 2019 Analysis of Impediments (AI) to Fair Housing, the City of Memphis and the surrounding area continue to have a need for 30,000 affordable housing units for people with extremely low, very low and low incomes. The study identified that many people paid more than forty percent of their income for shelter. This disparity could be linked to a high eviction and bankruptcy rate in Shelby County. In addition to the AI, HCD produces a Consolidated Plan with annual updates that outlines the sources and uses for funding. Memphis 3.0, a comprehensive plan seeks to coordinate and implement projects across the divisions for the City of Memphis, so that there is maximization of public investment. The Foote Park at South City is a good example of different divisions pooling resources to make the project work.

In 2020 and 2021, a moratorium on evictions because of COVID-19 delayed the additional rise in the numbers of homeless families and individuals. While efforts to create more housing units in the area continued, the number of units completed were hampered by supply chain problems and skilled laborers. The eviction moratorium was lifted in July 2021 and court dates were again honored. The City of Memphis and Shelby County used CARES ACT funds (Coronavirus, AID, Relief and Economic Security Act) to pay mortgages and rents that were in arrears for people, as the coverage provided by the Center for Disease Control's stay was lifted. The original focus was upon homeownership but as many people lost jobs due to small business and hospitality industries closures, the umbrella expanded to rental. Many of the houses in the community are rental and less are on the side of homeownership. The funds were also used to pay utility bills. The Eviction Settlement fund paid landlords to keep people in the properties. A by-product of these funds was an expanded avenue for legal defense for people facing eviction. This legal representation is helping stave off the stigma of eviction and possible homelessness. Few private landlords are willing to house people with recent evictions.

The HOME-American Rescue Plan (ARP) approved by the current administration seeks to provide additional tools to reduce homelessness. A joint program is being developed by the City and County with the assistance of homeless service providers to fight homelessness.

The City of Memphis and Shelby County are developing a joint program to address public issues that create barriers to affordable housing (i.e., code enforcement, zoning, etc.). The consultant hired (HR&A Advisors) will develop a housing plan. Evictions, income, and aggressive code enforcement are related to public policies that can hinder or delay the creation of decent, safe, and sanitary housing. By identifying the issues, the consulting firm will be able to look at these policies and offer suggestions for new policies, tools, and modifications to existing policies, which in the long run will enhance the reduction of barriers to decent safe and sanitary housing.

The lack of good credit has hampered both renters and potential homeowners. Credit Counseling is provided by United States Department of Housing and Urban Development (HUD) and THDA certified counselors and financial institutions have provide support and funding for educational workshops and materials. Some schools offer financial education to students and parents. MHA encourages families to become self-sufficient through its ROSS (Resident Opportunities and Self-Sufficiency) grants, partnerships with nonprofits and private employers. Homeownership is one of the goals of the program and people have purchased housing, increased disposable income through employment, job training and placement, as well as, increased educational attainment.

The City of Memphis, Memphis, Light, Gas, and Water and the Greater Memphis Chamber has invested in business development and increased the purchased that it makes using minority vendors. MHA actively seeks use minority vendors above the minimum federal, state, and local requirements. A

particular emphasis has been to use minority vendors for any Capital Improvement Projects that will preserve existing housing stock and aid in the creation of new housing units.

To preserve existing housing stock that need repairs that cannot be honored in a timely manner using traditional Public Housing Funds, the Agency is using the Rental Assistance Housing Demonstration Program (RAD). This program will allow for major system repairs and upgrades to the units. The units will then receive public assistance, but it will not be public housing funds, instead it will be Section 8. RAD allows the agency to seek private investment and tax credits to preserve the housing units for low-income residents.

The City of Memphis identifies and tries to address specific housing issues as part of the Consolidated plan and the Memphis Housing Authority usually aligns its projects to fit the identified needs in it and those of its residents. Last year the cost burden associated with renting or purchasing a home was a concern as there are local codes that specify the number of people allowed to occupy a unit. Code Enforcement along with the Shelby County Health Department have declared apartment complexes and detached housing units as uninhabitable for various violations. Unfortunately, many of the structures are demolished. While there are apartment units being built, they do not necessarily have the number of bedrooms needed by larger families. Overall, the need for two and three bedrooms is very high and the need for units with more bedrooms growing. To fill this void, this last year we have seen families with 5 or more children applying and grandparents assuming responsibility for grandchildren and having to move from high rises or one-bedroom units to accommodate the care of the minors. Currently, MHA has only two developments that has four and 5 bedrooms. It is rare to have a vacancy at Montgomery Plaza unless it is out of service because of repairs. Fowler Multi-family (Bishop G. E. Patterson Ponte) also managed by MHA has 4-bedroom units. At the other end of the spectrum is the increased need for one-bedroom units. These bedroom types are limited to the high rises and Kefauver Terrace and a limited number at Montgomery Plaza and the revitalized sites (HOPE VI Projects).

The Agency is continuing to build senior and disabled designated housing. Construction of senior housing at Legends Park (Edgeview at Legends) and Foote Park at South City.

- ↓ Exhibit 2 Contains the Analysis of Impediments and the Consolidated Annual Performance Evaluation Report (CAPER) for PY 2020-2021- (JULY 1, 2020 – JUNE 30, 2021)

2. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

Mindful of the need for participants in the Housing Programs to find areas (neighborhoods and zip codes) that do not have high concentration of poverty. MHA will be utilizing income targeting in order to assist with raising the rents at the different developments. HUD and The Tennessee Housing Development Agency (THDA) have identified zip codes and census tracts for incentives for housing development and job creation. These incentives will be used to assist residents on the path to self-sufficiency and financial stability of MHA. (See Exhibit 3)

3. Financial Resources.

Exhibit 4-The 2021 Audit is in progress. (See Exhibit 4-Financial Resources). Proposed sources will be presented in a chart format.

4. Rent Determination

The calculation process to determine rent has not changed and will not unless the Agency receives mandates from HUD to do so and with MHA Board approval.

5. Operation and Management.

Property Management of the last of the properties that had been managed by MHA (Askew, staff was transitioned to Management by Envelope Property Management August 31, 2020. The company was hired to enforce the MHA Lease and the ACOP (Admissions and Continued Occupancy Policy). To ensure compliance with the rules, guidelines, and policies a Site Compliance Officer was hired in addition the MHA Compliance Director. Housing Operations was split after Envelope became the Property Management Company. MHA reserves the right to continue the outsourcing of property management or to return it to an in-house process.

The RAD Program removed the following properties from contracted Management: Askew, All Phases of College Park and Upton Homes, these will be managed by another company. Memphis Housing Strategies a LLP with BGC, Inc. will oversee the property management hired for these units.

Grievance Procedures

Grievance Procedures were expanded in the 2020-2021 to include waivers that were sought in light of the COVID-19 waivers and a Policy sought by the Agency to accommodate in light of the pandemic; whenever possible tenants will be given an in person hearing but a virtual hearing will be arranged if the local restrictions do not permit. The Agency will strive to adhere to the policy and currently no one is being evicted for nonpayment of rent, only serious threats in regard to the wellbeing of others, threats of and acts of violence and drug related activities are not covered by the HUD Moratorium that expired September 2021.

7. Homeownership Programs.

The Memphis Housing Authority Homeownership Program, McKinley Park is located within the South Memphis area immediately south of Askew Place development. The Program was reduced to 23 homes, a reduction of 7 homes from the original plan. The final home was sold in the summer 2018. The MHA plans to seek development partnerships to develop the final 7 lots and has received HUD approval to sell the lots for development of units affordable to families earning more than 80% AMI. The Housing Choice Voucher program reported two participants purchased homes.

8. Community Service and Self-Sufficiency Programs-

a. Community Service

A number of the community service sites that provided a way for residents to complete their obligation are closed to the public at this time. They were within walking distance of the sites or accessible by public transit. Residents are performing community service on the properties by assisting with distribution of flyers or making telephone calls to check on fellow residents during the limited accessibility by the public and staff. Staff continued to form partnerships with the community so that when activities resume in the larger community, they will have a place to serve. A new listing of sites and job descriptions is being compiled along with job descriptions as the waiver for eligible resident's fulfilling this requirement expires April 2022.

b. Homeownership

Public Housing and Housing Choice Voucher residents using the Family Self-Sufficiency Program have homeownership as one of the goals for program participants. Two past participants have been featured on the HUD webpage "Humans of HUD" for this accomplishment.

c. Resident Services

MHA submitted a ROSS grant for Social Service Coordinators to serve Bishop G, E. Patterson Pointe (Fowler Multi-Fowler) Kefauver and Montgomery Plaza as the previous grant ended that served Askew, G. E Patterson Pointe, former Foote Homes and Montgomery Plaza. Currently residents at Barry Towers, Paul Borda Towers, Jefferson Square, Kefauver Terrace and Dr. R. Q. Venson Center receive services from the Social Service for the Elderly and People with Disabilities Social Service Coordinators. These funding sources are site specific. Exhibit 5 contains information as to the types of services provided. When fully occupied the high rises provides services to people occupying 662 units containing a mixture its efficiency, 1-bedroom and a limited number of two-bedrooms usually located on the first floor. Most of the units are occupied by single elderly and disabled individuals. There are some cases of couples occupying units but this is rare. Plans to convert these units to RAD will involve looking for 1-bedroom units as there are very few efficiencies in the current housing stock in the area.

A copy of the survey conducted for the Resident Opportunity and Self-Sufficiency grant that was used to ascertain the services requested by the residents of the impacted areas is also included as part of Exhibit 5.

9. Safety and Crime

The Agency will continue to seek additional outside funding to implement the recommendations for increased camera surveillance, lighting, monitoring, etc. that were suggested by the Safeway Security Audit to augment personal and property safety. The sources of funds will include donations and grants (from local, state, and federal government). While MHA has two security staff, and it continues to contract additional officers through a Security firm for the Central Office and is seeking funding to provide additional officers to patrol the properties. Currently there are no additional funds to place officers in the high rises for 24 hours. MHA will enter into interagency agreements with local law enforcement and security agencies to cover MHA properties (i.e., Memphis Police Services, University of Tennessee Police Department, Shelby County Sheriff Departments, Bartlett Police Department, etc.). Neighborhood Watch programs are being established at each of the properties in the near future.

Training for staff continues agencywide on safety. Fire drills occur at the Central Office and on each of the properties. The Memphis Housing Authority Board of Commissioners because of COVID-19 established a Telework Policy to limit contact with the public for the four high-rises that contain elderly and persons with disabilities. Working with the local municipalities, the plan is to bring the vaccination process to the residents as many lack transportation. The Policy was recently updated to include language and actions to cover family members.

10. Pet Policy

The Pet Policy is being updated to include new language about Assistance Animals in the ACOP. (See Exhibit 3). Clarity was needed to reasonably accommodate individuals while safeguarding the well-being of others.

11. Asset Management

Asset Management and Capital Improvements were separated into two separate departments after the MHA managed properties were transferred to Envelope Property Management effective August 21, 2020. A manual of operations is in progress for Asset Management. The

Compliance Department has been working to upgrade the training for Envolve and the privately managed site. A position in Compliance has the responsibility of file review to ensure compliance with HUD, Tax Credits, and other funding mandates. There are not changes to the 2021 Lease or Admissions and Continued Occupancy Policy (ACOP).

12. Substantial Deviation

There have been no substantial deviations to policy because of those areas being completed, as a part of the Significant Amendment mandated by HUD for CHAPS awarded as part of the Rental Assistance Demonstration Program. Each year we, will updated the Required Chart For HUD.

13. Significant Amendment/Modification

a. The disposition of the remaining land at Foote Park at South City constituted a Significant Amendment/Modification was approved December 2, 2020. All the remaining undeveloped acreage was submitted as part of the completion of the CNI grant. The per unit subsidy for the RAD Significant Amendment is attached using the 2021 information as no new numbers have been posted. (See Exhibit 6)

b. The new disposition activities to be carried out in 2022-2023. have been specified in detail to explain the sell or disposition of land to complete revitalization projects or public benefit activities. These are found in Section B2 of the plan.

A listing of all properties that remain from previous development activities has been updated. Some of the parcels are included as part of the new activities in section B2 as Demolition/ and or Disposition. Previous plans have stated that MHA will dispose of land that is excess, surplus, or unbuildable. To clarify we are adding the terminology "vacant" as the excess/surplus land was vacant. A list of the parcels will be included as Exhibit 7.

The Capital Improvement Plan will expend funds on the following pre-development activities. Capital funds will be used to pay for materials and services related to proposal development and project soft costs. It may also be used to pay for costs related to the demolition of units on a proposed site.

Capital Funds are projected to be used for the items tabulated below.

PRE-DEVELOPMENT CAPITAL FUND CONTRIBUTION	
Borda and Venson	
Construction Rehab (Permits)	
FHA Fees	
Architectural Design Fees	
Barry and Jefferson	
Construction Rehab (Permits)	
FHA Fees	
Architectural Design Fees	

CAPITAL FUNDS TO BE USED BEFORE RAD CLOSING

TN 1 - 13 Barry Towers	PTACS	\$120,000.00
TN 1 - 14 Venson Center	PTACS	\$129,600.00
TN 1 -18 Jefferson Square	PTACS	\$124,800.00
TN 1 -23 Borda Towers	PTACS	\$123,600.00
TN 1 - 23 Borda Towers	Comprehensive Building Asbestos Survey	\$50,000.00
	Total Amount	\$548,000.00

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

- | Y | N |
|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

1. The Agency will again issue a Request for Proposal (RFP) for the services of a Real Estate Agent /Broker to continue the process of disposing the of land in its portfolio. Dispositions of land will be submitted on behalf of the Agency for the sale of excess/surplus land and non-conforming (unbuildable as per local codes) parcels. MHA has a listing of parcels in an electronic format and will furnish a copy upon request and it is Exhibit 7 of the Plan. The identification of parcels was done to assist the Agency with future development activities. The MHA plans to issue RFPs in 2022-2023 for the development of additional parcels at Legends Park. College Park, Uptown Scattered Homes and Askew Place were converted to the Section 8 Platform under RAD in December 2021. Bishop G.E. Patterson Pointe (Fowler Homes Multi-family); Montgomery Plaza, and the four Senior/Disabled high rises either separately or as one project. The MHA will sell non-PH property to Elmwood Cemetery Foundation and remaining acreage (approximately 4.3 acres at 981 Sledge) was transferred to the City of Memphis for future expansion of its Public Works operations. Previous Annual Plan submissions also spoke of the disposition of Phase IV of University Place and that along with other parcels referenced previously is still under consideration for this annual plan period. The MHA will also propose for sale/disposition, other excess, vacant and unusable land in the MHA portfolio. The MHA continues to assist the City of Memphis with land acquisition needs in designated redevelopment areas as related to development of affordable housing and other public purposes in accordance with an approved redevelopment plan.

The Choice Neighborhoods Implementation (Foote Park at South City) grant awarded in 2015 saw an additional 62 units in Phase III completed and occupied in 2021. The units are a combination of one-, two-, three-bedroom units See Exhibit 8 (being updated) for the details for each phase.

The 73 RAD units for Choice neighborhood Implementation grant were completed and occupied in Phases I and II beginning in September of 2019. All the former Foote Homes residents have the right and priority to return to the newly constructed development. There were 385 households at Foote Homes at the close of the development. Phase IV closed in February 2021. Land Disposition: Planned activities include disposition of the Phase V area (120-unit senior building on 2.10 acres) and Phase VI (approximately 1.90 acres for another 80 units) Closing for Phase V is anticipated in April 2022.

September 30, 2022, is the HUD deadline to expend the funds awarded for the Choice Neighborhood Implementation grant (CNI). To ensure that Phase V and VI are completed; gap financing has been sought and a plan submitted to local HUD officials. Commitments for funding have been made from federal, state, local government and from private sources.

2. **Uptown Land Disposition**—1) The MHA is negotiating with the State of Tennessee (TDOT) regarding making signal/intersection improvements which would require the disposition of MHA owned property at the old Lauderdale Courts Development and remainder/vacant land associated with the former Hurt Village housing development. 2) Approximately 1.4 acres of remaining vacant/undeveloped property associated with former Hurt Village site is proposed for sale at FMV to a restaurant chain to develop another store at the corner of Danny Thomas and A.W. Willis. The MHA is proceeding with required due diligence for the environmental clearance and meeting other local, State and HUD requirements.

3. **Cleaborn Homes**— The MHA is also proposing to dispose of vacant/undeveloped land attached to the former Cleaborn Homes and adjacent to the parking lot of the Cleaborn Pointe Senior Building. This property/area is approximately 10' wide X 216' long and will enable the construction of a service drive for the adjacent property for the planned MLK community facility.) This is needed to meet design

and City permitting requirements for allow access to the MLK building for emergency vehicles and maintenance needs.4. Land Disposition for Utilities/Public Services/Improvements—The MHA will also partner with other entities, including state and local agencies to grant temporary construction and permanent easements to facilitate installation of public improvements and infrastructure projects proposed by authorized agencies as it requires disposition of MHA owned land and/or improvements affecting existing properties.

4. Designated Housing for the Elderly The need for additional dedicated housing for Elderly and/or Disabled families in MHA's jurisdiction has the agency planning to develop another senior housing facility on 4.77-acre parcel at Legends Park (Edgeview @ Legends Park). This is in addition to the housing planned as part of a future phase of the South City CNI grant. Phase 5 at South City will be another senior designated facility.

5. Acquisition/Rehabilitation-MHA will strategically explore the feasibility of development of an abandoned property at Walnut and Tate to increase the number of affordable housing units by 26. This is a potential acquisition and rehabilitation project. MHA will also pursue other partnerships to develop additional affordable housing within its jurisdiction.

6. Conversion of Public Housing to Project-Based Assistance. - As part of the notification to residents that they have "rights" under the RAD Conversion process each family has been informed of the amount of time that they must reside in the unit upon their return prior to asking for tenant-based voucher. The type of unit (Project-based Voucher or a Project-based Rental Assistance Voucher) determines the length of stay. In, addition residents are apprised that are other factors that may impact receiving a tenant-based voucher such as availability, etc. This notification is part of the overall RAD this notification is part of the overall process and must done with each individual family.

7. Conversion of Public Housing to Tenant-Based Assistance - The majority of the units converted by MHA will convert to Project-based vouchers at this time and is tied to the unit and not a family. The Project-based Rental Assistance (PBRA) will offer rental assistance to families inside to the RAD converted projects and will be managed by MHA.

8. Occupancy by Over-Income Families - The MHA is currently operating under the last direction received entitled "Frequently Asked Questions: Implementing the Housing Opportunity Through Modernization Act's (HOTMA) Public Housing Income Limit. HUD stated that it is not enforcing the removal of a family after two years of being "over-income." While MHA may not charge "a market rate rent, it can still require rent based upon a percentile of a family's income or a flat rent. MHA previous changed its ACOP to reflect options for a family; including the payment of market rent with the caveat that it is still waiting on further instructions from HUD.

9. No- Smoking- MHA has a "No Smoking Policy "to protect the health and well-being of residents". There are designated smoking areas on the properties and these areas are twenty-five feet from the building. This policy is communicated to the residents and is enforced. Signage is prominent and work with the local health department continues, so that smoking cessation classes are conducted periodically on each site or referrals made to a hotline. No smoking is allowed in the units, common areas or offices.

10. Project-based Vouchers- Project-based vouchers are planned at for the RAD Conversions of Askew, College Park Senior, and College Park Phases I and II as well as the Uptown Homes. In addition to PBV there will be units designated as Tenant-Based Rental Assistance (TBRA) units. The configuration of units is dependent upon the financing and the individual project.

The use of Capital Improvement funds to provide PTAC units at all four high rises (Barry Towers, Borda Towers, Jefferson Square and Dr. R. Venson Center) and a comprehensive building asbestos survey at Borda Towers as part of pre-development activities for the Rental Assistance Demonstration Program are a part of the revised 5-Year Capital Fund Action Plan.

11. Occupancy by Police Officers- MHA is open to using the occupancy of officers at the sites; however, the need for affordable housing in a tight rental market limits the Agency from offering this resource to most officers.

13. Units with Approved Vacancies for Modernization. There are 312 units that are off-line because of remediation of hazardous materials, fire damage and Winter Storm Viola. The impacted sites are Barry Towers, Paul Borda Towers, Jefferson Square, Dr. R. Q. Venson Center and Montgomery Plaza.

14. Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)- At this time, MHA is not operating either a Community Fund Facilities Grant or an Emergency Safety and Security Grant. There are plans to continue to apply for grants that MHA is eligible for that improve the quality of life for residents.

B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Exhibit 14</p>
B.4	<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 type="checkbox"/></p> <p>(b) If yes, please describe: In progress</p>
B.5	<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 and Annual Plan</p> <p>1. To expand the supply of assisted housing thus increasing choices.</p> <ul style="list-style-type: none"> a. MHA is in the process of completing the financing needed to build a ninety-nine-unit senior facility (Edgeview at Legends Park) on a vacant parcel associated with the Dixie Homes Hope VI. b. Forty-nine Project-based Vouchers will be awarded to Forum Flats. Priority will be given to returning Foote Homes residents. Additional developments are being built in the area (Union Row, etc.) and MHA is assessing if vouchers can be placed in them. c. HUD's award of additional Mainstream and VASH vouchers allows MHA to house more families. d. MHA will continue to partner with public, private, and nonprofit developers to build and renovate new affordable housing units for occupation by low and very low incomes. The MHA will be issuing Request for Proposals for the buildable excess properties associated with former HOPE VI sites (University Place, etc.) and other land in its portfolio. e. Memphis Housing Strategies as a separate nonprofit, allows for development opportunities and funding that cannot be accessed by the Housing Authority. It received its 501 c 3 effective April 2019 which will allow the agency to engage in development, property acquisition and project management activities. It will also allow the agency to apply for grants and other funds that it may not apply for as a 501 c (3). The MHA will continue to seek any and all funds using the 501 c 3 designation as well. MHS can also apply for competitive grants from the public and private. f. As tax credit properties become available, MHA may or may not exercise its option to buy the improvements constructed on its land. g. Mason Village received an additional 19 vouchers for the 77-townhouse development. It is located near the South City Redevelopment area Forum Flats located in the South City Redevelopment area. h. MHA will strategically explore the feasibility of development of an abandoned property at Walnut and Tate to increase the number of affordable housing units by 26. This is a potential acquisition and rehabilitation project. MHA will also pursue other partnerships to develop additional affordable housing within its jurisdiction that includes all of Shelby County. <p>2. To improve the quality of assisted housing and provide an improved living environment through repositioning.</p> <ul style="list-style-type: none"> a. In order, to fully utilize the Rental Assistance Demonstration (RAD) Program, MHA will use a multi-positioning approach for the conversion of units within its portfolio to this program. These actions will ensure that the number of affordable units are preserved or increased to meet the housing goals of the Agency. b. The MHA completed the RAD Conversion process for the first 2 groupings—College Park Senior, Family I and Family II and Uptown Phases II, III and IV/combined with the Askew Place property as Group 2. These first RAD conversions encompass 357 units. Additional housing groupings are planned for conversion of assistance from public housing to PBV/PBRA starting in 2022. This will include the 4 high risk development. c. Memphis Housing Strategies (MHS) received its 501 c 3 effective April 2019 which will allow the agency to engage in development, property acquisition, and project management activities. It will also allow the agency to apply for grants and other funds that it may not apply for as a 501 c 3. The MHA will continue to seek funds using the 501 c 3 designation as well. This entity is the conduit for the RAD Conversion. MHS is also a way for those partners that could not donate to a 501 c (4) to assist with the social services needed by families. d. The Choice Neighborhood Initiative created an endowment for the Former Foote Families that will need social and supportive services. This will allow the families to remain stable as they return to the site or remain at the relocation site. In addition, this will allow for the funds needed for tracking and the reporting period associated with close of the grant. <p>3. To promote self-sufficiency and asset development of families and individuals.</p>

	<p>a. MHA received a Resident Opportunities Self-Sufficiency (ROSS) grant to service Kefauver Terrace, Bishop G. E. Patterson Pointe (Fowler-Multi-family) and Montgomery Plaza and the renewal grant for the Family-Self-Sufficiency (FSS). Both programs have focus on educational attainment, digital and financial literacy, job training/job placement and homeownership. It also received a renewal FSS grant in 2020.</p> <p>b. The FSS program on the Housing Choice Voucher side has a heavy focus on homeownership as does Public Housing. Public Housing had 1 graduate and another in progress. The FSS participants that were in the Public Housing side will transition to the Section 8 platform, thus allowing them to continue until their contract is up or they graduate.</p> <p>c. Community Service is slated to begin again, and the Agency has complied a listing of sites and continues to solicit job descriptions from the agencies. It is hoped that through some of these volunteer opportunities that employment will be an end result, or the soft and hard skills needed for job retention acquired by the Community Service Volunteers.</p> <p>4. To ensure opportunity and affirm fair housing through deconcentration of poverty, racial grouping; along with development of mixed-income communities to provide housing opportunity for all.</p> <p>a. Mindful of the need for participants in the Housing Programs to find areas (neighborhoods and zip codes) that do not have high concentration of poverty. MHA will be utilizing income targeting in order to assist with raising the rents and the different developments. This stratification of income will be another step ensuring that each development to be HUD and the Tennessee Housing Development Agency THDA have identified zip codes and census tracts in Memphis and Shelby County for incentives for job creation and housing development. These incentives will be used to assist residents on the path to self-sufficiency which includes financial stability.</p> <p>5. To increase availability of housing by awarding Project-Based Vouchers.</p> <p>a. Sixty Project-based Vouchers were awarded to Forum Flats and additional vouchers are expected to be awarded to Union Row located in the South City Redevelopment District. Edgeview at Legends, the planned senior development will also contain PBVs. As always, MHA will continue to seek partnerships and develop housing that will the use of Project-based vouchers to make additional affordable housing available to families with low and very-low incomes. As some of these projects are being negotiated or are in the initial planning stages the finite numbers have not been identified (See Exhibit 10).</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. 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.</p> <p>The Capital Plan was approved 11/03/2021. A Revised Plan was submitted 9/22 as part of this Significant Amendment .</p>

Instructions for Preparation of Form HUD-50075-ST

Annual PHA Plan for Standard and Troubled PHAs

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

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. All PHAs must complete this section.

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." [\(24 CFR §903.7\)](#)

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. 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. [\(24 CFR §903.7\(a\)\(1\)\)](#) 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. [\(24 CFR §903.7\(a\)\(2\)\(ii\)\)](#)

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). [\(24 CFR §903.23\(b\)\)](#) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. [\(24 CFR §903.7\(b\)\)](#) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. [\(24 CFR §903.7\(b\)\)](#). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. [\(24 CFR §903.7\(b\)\)](#) Describe the unit assignment policies for public housing. [\(24 CFR §903.7\(b\)\)](#)

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. [\(24 CFR §903.7\(c\)\)](#)

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. [\(24 CFR §903.7\(d\)\)](#)

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. [\(24 CFR §903.7\(e\)\)](#)

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. [\(24 CFR §903.7\(f\)\)](#)

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. [\(24 CFR §903.7\(k\)\)](#)

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. [\(24 CFR §903.7\(l\)\)](#) A description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. [\(24 CFR §903.7\(l\)\)](#)

☐ **Safety and Crime Prevention.** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. [\(24 CFR §903.7\(m\)\)](#) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs

provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. 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 CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; 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.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: <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 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. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing.** 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](#)

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days' notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

- B.3 Civil Rights Certification.** Form HUD-50077, *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))
- B.4 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))
- B.5 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.6 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)
- B.7 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). 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.
- B.8 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

- C.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."

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

Public reporting burden for this information collection is estimated to average 9.2 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.