



Housing Authority of the City of Columbia, Missouri

201 Switzler Street, Columbia, MO 65203

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Resident Advisory Board

Open Meeting Notice

CHA Resident Advisory Board Meeting Agenda

Date: Thursday, March 5, 2020

Time: 5:00 p.m.

Place: Paquin Tower Community Room, 1201 Paquin Street

- I. Call to Order and Introductions: Laura Lewis, Director of Affordable Housing Operations
- II. Approval of Meeting Agenda
- III. Review of the Purpose of the Resident Advisory Board
- IV. Review of the FYE2020 Annual Plan and Five-Year Plan
- V. Presentation of proposed revisions to the Columbia Housing Authority Grievance Procedure
- VI. Discussion of Future Meeting Topics
- VII. Schedule of Next Meeting – Thursday, April 2, 2020
- VIII. Adjournment

*** RAB Members needing transportation assistance should call Renota Jenkins at (573) 443-2556 ext. 1121 before 12:00 Noon on Tuesday March 3, 2020.**

A light meal will be available for RAB members at 4:45 p.m.

If you wish to participate in the meeting and require specific accommodations or services related to disability, please contact Ms. Renota Jenkins, Receptionist at (573) 443-2556, extension 1121, or (800) 735-2966 (TTY) at least one working day prior to the meeting.

Media Contact: Phil Steinhaus, CEO

Phone: (573) 443-2556

E-mail: ColumbiaHA.info@gmail.com

A complete agenda packet is available for review at all CHA offices during regular business hours and posted on the CHA web site at: www.ColumbiaHA.com.

“It is the mission of the CHA Resident Advisory Board to facilitate positive communication and understanding among residents and administrators of CHA in order to create opportunities to continually improve affordable housing and the environment of the community.”

Resident Advisory Board - PHA Plans

Forming the Resident Advisory Board

What is required?

The Resident Advisory Board (RAB) provides the PHA and the residents with a forum for sharing information about the Agency's Annual Plan. Section 511 of the United States Housing Act and the regulations in 24 CFR part 903 require that PHAs establish one or more Resident Advisory Board(s) (RAB) as part of the PHA Plan process. RAB membership is comprised of individuals who reflect and represent the residents assisted by the PHA. The role of the RAB is to assist the PHA in developing the PHA Plan and in making any significant amendment or modification to the Plan.

What is the role of the RAB?

The main role of the RAB is to make recommendations in the development of the PHA Plan. In order to facilitate collaboration, PHAs should encourage the RAB's participation from the inception of the planning process. PHAs are also required to request input from the RAB for any significant amendment or modification to the PHA Plan.

When should the RAB be appointed?

The RAB should be appointed well in advance of the date that the PHA Plan is due to HUD to ensure effective resident participation in the development of the plan.

Who can participate on the RAB?

If a jurisdiction-wide resident council is in place that complies with tenant participation regulations at 24 CFR Part 964, the PHA must appoint this group or its representatives as the Resident Advisory Board. If the PHA does not have a jurisdiction-wide resident council, then it should appoint resident councils or their representatives to serve as one or more of the RABs. A PHA may require that the resident councils choose a limited number of representatives to serve as RAB members.

Where there are no resident councils that comply with the tenant participation regulations, then the PHA must appoint one or more RABs or board members as needed to adequately reflect and represent the residents assisted by the PHA. The PHA should give adequate notice of its intentions to the residents and encourage the residents to form resident councils that comply with the tenant participation regulations. PHAs have discretion in determining the method of appointment of RABs, as long as a PHA ensures that its RAB or RABs reflect and represent all the residents assisted by the PHA.

What about Section 8 recipients?

Because Section 8 residents do not have resident councils, PHAs with a significant sized tenant based assistance program must ensure that Section 8 residents are adequately represented or that reasonable efforts are made to secure their participation in the RAB. A significant sized tenant based assistance program is one where at least 20 percent of the total PHA's households receive tenant-based assistance.

Section 8-only PHAs are not exempt from the RAB requirement and must also appoint one or more RABs that adequately represent the population served. Given that there are no resident councils that comply with the tenant-participation regulations under the tenant-based assistance program, Section 8-only PHAs have discretion in the RAB appointment process. Participation in a RAB is limited to residents that are assisted under federally assisted public housing and the Section 8 tenant-based program.

How many RABs are required?

PHAs that do not have a jurisdiction-wide RC have discretion to determine the number of RABs that they may appoint. PHAs are required to institute at least one RAB; the number of RABs beyond that number will depend on the size and the complexity of the PHA or its developments. In deciding the number of RABs to be established, a PHA should consider how adequate representation of its entire resident population can be provided.

How does the PHA fix the term of service?

There is no fixed term for membership on a RAB. A PHA has discretion to establish its own policy regarding the duration of the appointments. In determining the tenure to be adopted, PHAs may consider the number of RABs and the number of residents who volunteered to serve. Greater RAB participation may be realized by rotating residents' tenure.

What if the PHA cannot establish a RAB?

If, after making all possible endeavors, a PHA is not successful in establishing a RAB, it may appoint all of the agency's assisted residents as members of the RAB. The PHA must notify all of its members that they have been appointed as members and inform them of their role and responsibilities regarding the development of the PHA Plan. The PHA must also provide residents with notification of meetings (at least 48 hours in advance) and provide copies of any materials for review.

Encouraging Participation in the RAB

Residents who volunteer to be part of the RAB can be excellent partners to the PHA during the development of the PHA Plan. Although PHAs are expected to make a significant effort to ensure adequate resident representation in the Resident Advisory Boards, securing participation by residents during the planning process may pose a challenge for some PHAs.

How can a PHA encourage residents to take advantage of the RAB opportunity?

Personal appeals are one strategy. Executive Directors may be more likely to get commitments from residents if they personally request their participation. Residents might also be hesitant to volunteer to work with a Resident Advisory Board if they do not really understand their role as a member of the RAB. The PHA provide adequate information to all residents regarding the RAB. The PHA should inform residents of the purpose and role of the RAB, as well as practical information such as the time commitment required. The PHA should make clear to residents and Section 8 participants that the partnership between the residents and the PHA is of benefit to both parties. The residents are provided with an opportunity to voice their concerns so that their needs are addressed and they can become involved in the planning process. The PHA also gains essential information from the residents about the improvements that need to be made at the agency's developments and residents' self-sufficiency needs. This information helps the PHA to set priorities for capital improvements and advises resident services programming.

PHA's Responsibility to the RAB

What are the PHAs' Responsibilities?

PHAs have the responsibility to ensure that the RAB can adequately serve its function including:

- PHAs must give the RABs sufficient time to review and make recommendations on the Plan. RABs will be able to contribute best if they are provided with adequate information regarding the PHA's programs and the policies included in the Five-Year and Annual PHA Plan.
- The PHAs should give RABs advance notice of meetings scheduled to discuss areas of the Plan (generally, at least 48 hours, or more depending on the meeting agenda).
- RABs should also be provided with any existing documents that would assist them to make productive recommendations during the working meetings.
- PHAs should provide the RABs with reasonable means to carry out their functions such as making available a meeting place for discussing programs with the residents. RABs should also have access to any other communication tools such as a telephone, writing material, or computers that may facilitate their contacts with other resident households or to obtain further information on the programs.

- *At what stage in the planning process must PHAs involve the RABs?*
The role of the RABs is to assist and make recommendations regarding the development of the PHA Plan and any significant amendments or modifications to it. RABs should be involved in the planning process as soon as it is feasible and must be given sufficient time to fully participate in the process so that they can carry out their proper role and provide representation that is meaningful and relevant to the development of the Plan. The PHA and the RAB should develop a reasonable timetable to promote participation, including adequate notice of meetings. To facilitate productive meetings, PHAs may do preliminary work prior to involving the RABs, such as gathering and compiling data and materials to help residents participate in the process, including some initial recommendations. A PHA must consider the recommendations of the RABs and make revisions to drafts or to the Plan which it deems appropriate.

Public Notice and Comment Period Requirements

The PHA governing body is required to convene a public hearing to discuss their Five-Year and/or Annual Plan and to prompt comments from the public regarding their proposed activities. PHAs must consider, in consultation with the RABs, all the comments received at the public hearing.

PHAs are required to carry out the following steps at least forty-five (45) days prior to the scheduled public hearing:

- Publish a notice indicating that a public hearing to present the Plan and further public comments will be held including time, date and location. The notice should also indicate where the Plan and pertaining documents will be available for their review. The documents should be maintained at an accessible place such as the PHA's central office.
- Conduct outreach activities to promote comprehensive participation in the public hearing.

Any significant amendment or modification to the plan is subject to the public hearing and RABs' assessment requirements.

Incorporating Comments into the Plan

PHAs are required to consider the RAB's recommendations to the Plan but are not required to agree with them. The recommendations received must be submitted by the PHAs as a required attachment to the Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. It is prudent for PHAs to acknowledge those recommendations that conform to the programs and the mission of the PHA. If the RABs do not provide recommendations to the Plan, the PHA must document that in the attached narrative.

Announcement of Membership of the RAB

PHAs must provide an attachment to the PHA Plan listing the members of its Resident Advisory Board(s). If the number of participants is too large to reasonably list, then the attachment should include a list of the organizations represented on the RAB or other description sufficient to identify how members were chosen.

RAB Notification of Plan Process

To ensure that the RAB is fully engaged in the full plan process, PHAs are required to promptly provide a copy of the HUD award letter (identifying formula share allocations for Capital Fund and Drug Elimination Programs), plan approval letter and at least one copy of the approved plan to each RAB.



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CHA TENANT GRIEVANCE PROCEDURES

- I. **PURPOSE:** This grievance procedure has been adopted to provide a forum and procedure for tenants to seek the just, effective and efficient settlement of grievances against the Housing Authority of the City of Columbia (CHA).
- II. **GOVERNING LAW:** The law governing this grievance procedure is Section 6(k) of the U.S. Housing Act of 1937 (42 U.S.C. sec. 1437d (k) and subpart B of 24 CFR part 966 (24 CFR secs.966.50-966.57)
- III. **APPLICABILITY:** In accordance with applicable federal regulations, this grievance procedure shall be applicable to all individual grievances (as defined in Section IV below) between Tenant and the CHA with the following exception:

This grievance procedure is not applicable to disputes between Tenants not involving the CHA, or to class grievances involving groups of Tenants. Also, this grievance procedure is not intended as a forum for initiating or negotiating policy changes between Tenants, or groups of Tenants, and the CHA Board of Commissioners.

- IV. **DEFINITIONS:** The following definitions of terms shall be applicable to this grievance procedure:
 - A. **Grievance:** Any dispute which a Tenant may have with respect to an action or a failure to act by the CHA in accordance with the individual Tenant's lease, housing assistance voucher and any associated lease addendums or CHA regulations, which adversely affects the individual Tenant's rights, duties, welfare and status.
 - B. **CFR:** The code of federal regulations, which contains the federal regulations governing this grievance procedure.
 - C. **Complainant:** Any Tenant (as defined in this section below) whose grievance is presented to the central office of the CHA, in accordance with the requirements set forth in this procedure.
 - D. **Drug-related Criminal Activity:** The illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute, or use a controlled substance, as defined in sec. 102 of the Controlled Substances Act (21 U.S.C. Sec. 802) as from time to time amended.
 - E. **CHA or "Authority":** The Housing Authority of the City of Columbia, a body corporate organized and existing under the laws of the State of Missouri.

- F. Elements of Due Process:** The following procedural safeguards are required to be followed in an eviction or contract action or a termination of tenancy in state or local courts:
1. Adequate notice to the Tenant of the grounds for terminating the tenancy or contract and for eviction;
 2. Right of the Tenant to be represented by counsel;
 3. Opportunity for the Tenant to refute the evidence presented by the CHA, including the right to confront and cross examine witnesses and to present any affirmative legal or equitable defense which the tenant may have;
 4. A decision on the merits.
- G. Hearing Panel:** A three-member panel composed of impartial persons, selected in accordance with 24 CFR sec. 966.55 and this procedure to hear grievances and render decisions with respect thereto.
- H. HUD:** The United States Department of Housing and Urban Development.
- I. Notice:** As used herein, the term notice shall, unless otherwise specially provided, mean written notice.
- J. The "Regulations":** The HUD regulations contained in subpart B of 24 CFR part 966.
- K. Resident Organization:** The organization of residents, which includes any resident management corporation or council.
- L. Tenant:** The adult person or persons, other than a live-in aid, receiving housing assistance:
1. Who resides in the unit and who executed the lease with CHA as lessee of the dwelling unit, or, if no such persons reside in the unit,
 2. The person who resides in the unit, and who is the remaining head of the household of the Tenant family residing in the dwelling unit.
 3. A Tenant is also any head of household who receives housing assistance in any form from the CHA.
- M. Head of Household:** The adult person or persons (including co-heads of households) responsible for signing the legal agreements with the CHA in order to receive housing assistance.
- N. Calendar Days:** All days of the yearly calendar including weekends and holidays.

O. Business Days: Monday through Friday of each week, except for legal holidays recognized by the federal or state government.

V. INCORPORATION IN HOUSING ASSISTANCE LEASES AND AGREEMENTS: This grievance procedure shall be incorporated by reference in all public housing leases and other housing assistance agreements between Tenants and the CHA, whether or not so specifically provided in such leases or agreements.

VI. INFORMAL SETTLEMENT OF GRIEVANCES

A. Initial Presentation: Any grievance must be presented in writing, to the CHA Chief Executive Officer's Office within ten (10) calendar days after the occurrence of the event, giving rise to the grievance.

B. Informal Settlement Conference: If the grievance is not determined by the CHA to fall within the exclusion mentioned in Section III above, the CHA will, within ten (10) calendar days after the initial presentation of the grievance, schedule an informal settlement conference with the Complainant or their representatives in an attempt to settle the grievance without the necessity of a formal grievance hearing. This notification of an informal settlement conference shall be in writing and will provide the time and place of the conference.

Failure to attend the informal settlement conference without just cause will be determined as a waiver of all grievance rights relating to the matter giving rise to the grievance.

C. Written Summary: Within ten (10) calendar days after the informal settlement conference, a summary of the informal discussion shall be prepared by the CHA and a copy thereof shall be provided to the Complainant. The summary shall be in writing and shall specify the names of the participants in the discussion, the date of the discussion, the nature of the proposed disposition of the grievance, and the specific reasons for such disposition. The written summary will also specify the procedures by which the Complainant may obtain a formal grievance hearing if not satisfied by the proposed disposition of the grievance. A copy of the written summary shall also be placed in Complainant's tenant file.

VII. FORMAL GRIEVANCE HEARING: The following procedures apply to the request for a formal grievance hearing under the grievance procedure:

A. Request for Hearing: If the Complainant is not satisfied with the results of the informal settlement conference, the Complainant must submit a written request for a formal grievance hearing to the CHA Chief Executive Officer's Office within ten (10) calendar days of the date of the written informal settlement conference summary as required under Section VI above.

Complainant's written request for a formal grievance hearing must specify:

1. The reasons for the grievance; and

2. The action or relief sought by the Complainant.

B. Failure to Request a Formal Grievance Hearing: If the Complainant fails to request a formal grievance hearing within ten (10) calendar days after the date of the written informal settlement conference summary, the CHA's decision rendered at the informal settlement conference becomes final and the CHA is not thereafter obligated to offer the Complainant a formal grievance hearing.

VIII. SELECTION OF FORMAL GRIEVANCE HEARING PANEL: All formal grievance hearings shall be conducted by an impartial person or persons appointed by the CHA in the manner described below:

A. The appointments of persons who shall serve as hearing panel members shall be governed by the following procedures:

1. One member of the hearing panel shall ~~be a member of~~ represent the CHA Board of Commissioners and shall be chosen by the Chairman of the Board.

2. One member of the hearing panel shall represent responsible persons residing in Boone County and shall be chosen by the CHA Board of Commissioners. The community member must meet the following criteria for appointment:

- a) One year of current Boone County residency.
- b) No criminal record.
- c) Available to attend formal hearings during business hours.
- d) Prior experience working with others on community committees, panels, task forces, etc.
- e) Willing to read and review hearing materials.
- f) Willing to serve a two-year appointment.
- g) Willing to attend necessary orientation and training sessions.
- h) Must complete a Formal Hearing Panel application and provide three references from persons who can be contacted.

3. One member of the hearing panel shall represent the residents of the CHA and be chosen by the Board of Commissioners. The resident member must meet the following criteria for appointment:

- a) One year of current CHA ~~public-affordable~~ housing residency.
- b) Resident in good standing. (No major ~~violations of their lease, or Admissions and Continued Occupancy Policy, violations HCV Administrative Plan, or Crime-Free Housing Addendum.~~)
- c) Available to attend formal hearings during normal business hours.
- d) Must be a current or former officer of a CHA resident management corporation or council (tenant association) or have similar experience working with others on community committees, panels, task forces, etc.
- e) Willing to read and review hearing materials.
- f) Willing to serve a two-year appointment.

- g) Willing to attend necessary orientation and training sessions.
 - h) Must complete a Formal Hearing Panel application and provide three references from persons who can be contacted.
- B. Terms of the office for each hearing panel member shall be two years. In the event that a new hearing panel member is not selected to replace a member whose term has expired, the member whose term has expired shall remain a member of the panel until a replacement is chosen.
- C. Upon appointment, the persons appointed and the resident organizations shall be informed in writing of the appointments. A list of selected panelists will be kept at the Chief Executive Officer's office and be made available for public inspection at any time.
- D. The members of the hearing panel must disqualify themselves from formal hearing grievances that involve personal friends, relatives, persons with whom they have any business relationship, or grievances in which they have some personal interest. Further, such persons are expected to disqualify themselves if the circumstances are such that a significant perception of partiality exists and is reasonable under the circumstances. If a Complainant fails to object to the panelists on the grounds of impartiality at the commencement or before the hearing, such objection is deemed to be waived and may not thereafter be made.

IX. SCHEDULING OF FORMAL GRIEVANCE HEARINGS

- A. **Formal Grievance Hearing Prerequisites:** A Complainant does not have a right to a formal grievance hearing unless the Complainant has satisfied the following prerequisites to such a hearing:
 1. The Complainant has requested a formal grievance hearing in writing.
 2. The Complainant has completed the informal settlement conference procedure or has requested a waiver for good cause.
 3. If the matter involves the amount of rent which the CHA claims is due under the Complainants' lease, the Complainant shall have paid to the CHA an amount equal to the amount due and payable as of the first of the month preceding the month in which the complained of act or failure to act took place. If for any reason the hearing is delayed, the Complainant shall thereafter, deposit the same amount of the monthly rent in an escrow account monthly until the Complaint is resolved by decision of the hearing panel. Unless waived by the CHA Chief Executive Officer in writing, no waiver will be given by the CHA except in cases of extreme and undue hardship to the Complainant, determined at the sole and absolute discretion of the CHA.
- B. **Proper Notice:**
 1. Upon Complainant's compliance with the prerequisites to a hearing set forth above, within ten (10) calendar days the Complainant shall be notified of a formal

grievance hearing. The hearing panel shall schedule the formal grievance hearing promptly for a time and place reasonably convenient to both the Complainant and the CHA.

2. The written notification specifying the time, place and the procedures governing the formal grievance hearing shall be delivered to the Complainant and the appropriate CHA official, who, unless otherwise designated, shall be the Chief Executive Officer.

X. PROCEDURES GOVERNING FORMAL GRIEVANCE HEARINGS

A. FAIR HEARINGS: The formal grievance hearings shall be held before a hearing panel as described above in Section VIII. The Complainant shall be afforded a fair hearing, which shall include:

1. The opportunity to examine before the hearing any CHA documents, including records and regulations that are directly relevant to the hearing. The Complainant will be allowed to copy any such document at the Complainant's expense. If the CHA does not make the document available for examination upon request by the Complainant, the CHA may not rely on such a document at the grievance hearing.
2. The right to be represented by counsel or other person chosen as the Complainant's representative and to have such person make statements on the Complainant's behalf.
3. The right to a private hearing unless the Complainant requests a public hearing. The right to present evidence and arguments in support to the Complainant's complaint, to controvert evidence relied on by the CHA and to confront and cross examine all witnesses upon whose testimony or information the CHA or its management relies; and
4. A decision solely and exclusively upon the facts presented at the hearing.

B. Prior Decision in Same Matter: The hearing panel may render a decision without proceeding with the hearing, if they determine that the issue has been previously decided in another proceeding.

C. Failure to Appear: If the Complainant or the CHA fail to appear at a scheduled hearing, the hearing panel may make a determination to postpone the hearing for a period not to exceed ten (10) calendar days or may make a determination that the party failing to attend has waived the right to a hearing. In such event, the hearing panel shall notify the Complainant and the CHA of the determination.

The failure to attend a formal grievance hearing shall not constitute a waiver of any right for which the Complainant may have to contest CHA's disposition of the grievance in an appropriate judicial proceeding.

- D. **Required Showing of Entitlement of Relief:** At the hearing the Complainant must first make a showing of an entitlement to the relief sought and thereafter the CHA must sustain the burden of justifying CHA's action or failure to act against the complaint.
 - E. **Informality of the Formal Grievance Hearing:** The formal grievance hearing shall be conducted informally by the hearing panel, and oral or documentary evidence pertinent to the facts and issues raised by the Complainant may be received without regard to admissibility under the rules of evidence applicable to judicial proceeding.
 - F. **Orderly Conduct Required:** The hearing panel shall require the CHA, the Complainant, counsel and other participants or spectators, to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.
 - G. **Electronic Recording/Transcript of Hearing:** The hearings shall be electronically recorded and the recording will be retained for a two-year period. The Complainant or the CHA may arrange in advance, and at the expense of the party making the arrangement for a transcript of the hearing. Any interested party may purchase a copy of such transcript.
 - H. **Accommodation to Individuals with Disabilities:** The CHA must provide reasonable accommodation for persons with disabilities to participate in formal grievance hearings. Reasonable accommodation may include qualified sign language interpreters, readers, and accessible locations.
- XI. **DECISION OF THE HEARING PANEL:** At or subsequent to the completion of the formal grievance hearing, the hearing panel shall make a determination as to the merits of the grievance and the following provisions shall govern:
- A. **Written Decision:** The hearing panel shall prepare a written decision, together with the reasons for the decision within fifteen (15) business days after the completion of the hearing.
 - 1. A copy of the decision shall be sent to the Complainant and the CHA. The CHA shall retain a copy of the decision in the Complainant's tenant file.
 - 2. A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by the CHA and made available for inspection by any prospective Complainant, his representative, or the hearing panel.
 - B. **Binding Effect:** The written decision of the hearing panel shall be binding upon the CHA, which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the CHA's Board of Commissioners determines, within ten (10) calendar days, and properly notifies Complainant of its determination, that:
 - 1. The grievance does not concern CHA action or failure to act in accordance or involving the Complainant's lease, housing assistance agreement or CHA's

regulations, which adversely affect the Complainant's rights, duties, welfare or status, or

2. The decision of the hearing panel is contrary to applicable Federal, State, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the CHA.

- C. **Continuing Right of Complainant to Judicial Proceedings:** A decision by the hearing panel or Board of Commissioners in favor of the CHA or which denies the relief requested by the Complainant, in whole or in part, shall not constitute a waiver of, nor effect in any way the rights of the Complainant to a trial or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

XII. NOTICES

- A. All notices under this grievance procedure shall be deemed delivered:
 1. Upon personal service thereof upon the Complainant or an adult member of the Complainant's household,
 2. Upon the date received for or refused by the addressee, in the case of certified or registered U.S. Mail, or
 3. On the second day after the deposit thereof for mailing, postage prepaid, with the U.S. Postal Service, if mailed by first class mail, other than certified or registered mail.
- B. If the tenant is visually impaired, any notice hereunder delivered to such Tenant shall be in an accessible format.

- XIII. **MODIFICATION:** This grievance procedure may not be amended or modified except by approval of a majority of the Board of Commissioners of the CHA, present at a regular meeting called for such purposes. Further, in addition to the foregoing, any changes proposed to be made to this grievance procedure must provide for at least thirty (30) days advance notice to tenants and resident organizations, setting forth the proposed changes and providing an opportunity to present written comments. The comments submitted shall be considered by the CHA, before final adoption of any amendments hereto.

XIV. MISCELLANEOUS

- A. **Captions:** Captions or paragraph headings set forth in this grievance procedure are for convenience of reference only and shall not be construed or interpreted to affect the substance of the paragraphs or sections so captioned.
- B. **Concurrent Notice:** If a Tenant has filed a request for a formal grievance hearing hereunder in a case involving the CHA's notice of termination of tenancy, the Complainant should be aware that the State law notice to vacate and the notice of termination of tenancy required under Federal law run concurrently. Therefore, if the hearing panel

upholds the CHA's action to terminate the tenancy, the CHA may commence an eviction action in court upon the sooner of, the expiration of the date for the termination of tenancy and vacation of premises stated in the notice of termination delivered to Complainant, or the delivery of the report of the decision of the hearing panel to Complainant.

CHA Grievance Procedures

Revisions Adopted January 19, 2016

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: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-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 of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Housing Authority of the City of Columbia, Missouri</u> PHA Code: <u>MO-007</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/01/2020</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>120</u> Number of Housing Choice Vouchers (HCVs) <u>1,807 (Includes 150 VASH & 597 RAD PBV)</u> Total Combined <u>1,927</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: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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Lead PHA:																											

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

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

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

Statement of Housing Needs and Strategy for Addressing Housing Needs.

Housing needs have remained high during the past year with 482 households on the Public Housing and Project-Based Voucher (PBV) waiting list and 931 households on the HCV Housing Choice Voucher Program waiting list. Of these households, 80% of Public Housing and PBV and 86% of HCV applicants have extremely low incomes at or below 30% AMI. The HCV waiting list was open for one week in October 2018 and 933 households applied for housing. This represents a 20% decrease in applicants as compared to June 2015. However, this number far exceeds the number of families the CHA will be able to serve through this program in the next two years. We plan to open the HCV waiting list in sometime in 2022 for one week. Between 8,00 and 1,000 families will apply for assistance. Historical numbers of applicants for the Housing Choice Voucher Program are below:

Number of Housing Choice Voucher Program Applicants					
Year	2008	2010	2012	2015	2018
# Applicants	1,000	1,200	1,500	1,115	931

The demand for efficiency and one-bedroom housing units remains high with 89% of Public Housing and PBV applicants and 50% of HCV applicants being eligible to receive assistance for this size of housing unit. Most of these 281 applicants are single person households. The 2015-2019 Consolidated Plan documents a continued high need for elderly housing and housing for persons with disabilities. The number of disabled families on the Public Housing and PBV waiting list (112) remains high, representing 26% of all applicants. Black/African American households continue to make up a disproportionate number of housing applicants. (Public Housing and PBV Family Sites: 52% and HCV Housing Choice Voucher Program: 66%)

The public engagement process of the 2020-2024 Consolidated Plan consistently identified the need for affordable housing as a high priority.

The Affordable Housing Focus Group identified the following needs & benefits of Affordable Housing:

- a. Stable housing = stable people. Safety, self-reliance, health & employment all identified as benefits of affordable housing. Revitalizing communities & increased accountability also cited as benefits.
- b. Stability in education, sense of safety & belonging. Improved health outcomes, improved grades. Access to healthy foods, & activities. Community & shared child care opportunity.
- c. Stability increases from renting, increased net worth, equity, appreciated assets. Greater neighborhood cohesiveness. Provides pathway to self-sufficiency.

Other needs and benefits identified are:

- 1.) Stable housing is good for children (less changing of schools & increased family stability);
- 2.) Families are more safe, able to focus on goals, & have access to services.
- 3.) persons with disabilities need affordable & accessible housing; &
- 4.) Need to preserve affordable housing in the central city.

The Neighborhood Congress identified the following needs & priorities:

- 1.) Affordable housing is a major issue in COMO, people priced out of the market;
- 2.) Over 15,000 cost burdened renters;
- 3.) Greatest number served is the renovation of public housing;
- 4.) Need for energy efficiency identified;
- 5.) Affordable housing is a huge problem with 252 homeless & 13,800 cost burdened;
- 6.) Low-cost rentals nearly impossible to find;
- 7.) Need to increase affordable housing stock & rehab more central city homes;
- 8.) Need affordable housing near employment centers; &
- 9.) Highest need - poor, single mothers & persons with disabilities.

The Infrastructure groups identified the following needs & priorities:

- 1.) Have a program in place so funds can be paired up with other sources for example-fixing city sewers & also fixing INI issue;
- 2.) Focus monies in low-income neighborhoods, elderly citizens, fixed income, focus on people who cannot help themselves, preserving homes, and neighborhoods-strengthen neighborhoods and community;
- 3.) Shortage of affordable housing;
- 4.) Sanitary sewer-focus on areas of need; &
- 5.) Environmental concerns- sanitary sewer and aging infrastructure.

It is worth noting that the Columbia Housing Authority periodically closes the public housing waiting list and quits filling units in CHA properties slated for renovation under the Rental Assistance Demonstration (RAD) program. The CHA stops filling vacancies at these sites in order to have enough vacant units to relocate families on-site while renovations to their homes are completed. Once properties are renovated, a large number of families are pulled off the waiting list to fill the newly renovated units. As a result, the number of families on the CHA Public Housing waiting lists does not always accurately reflect the larger number of families who would ordinarily be on our Public Housing & PBV waiting lists.

Significant increases in utility costs make it more difficult for low income households to secure and maintain their housing. Poor energy efficiency of low-income housing puts families at financial risk often leading to unpaid utility bills and loss of housing. In turn, low-income families with large debts owed to utility companies are unable to get utilities turned on in their names without paying off their debt to the utility companies. This often forces families to move significant distances outside of their current utility provider's service area.

The City of Columbia's 2015-2019 Consolidated Plan for the Community Development Block Grant and HOME Investment Partnerships Program provides significant documentation of the housing needs in Columbia and the surrounding Boone County MSA. **[Exhibit A]**

Strategy for Addressing Housing Needs

The Columbia Housing Authority strategy for addressing housing needs remains relatively unchanged from the CHA's FYE2019 PHA Plan with the added Significant Amendments of: 1.) plans to acquire property for developing affordable housing; and 2.) Plans to demolish the Providence Walkway Apartments and replace them with new apartments.

- The CHA is continuing to implement its Strategic Plan for its Affordable Housing Initiative which has as its main focus, the revitalization of all of the CHA's 717 units of Public Housing stock through the HUD Rental Assistance Demonstration (RAD) program and developing new affordable housing including the Patriot Place Apartments, completed in April 2016.
- Significant Amendments to the FY2019 PHA plan included the following and are incorporated into this year's plan:
 - 1.) The CHA will acquire property for developing new affordable housing or the replacement of current public housing stock.
 - 2.) The CHA will demolish the Providence Walkway Apartments and replace these public housing units with new apartments. All residents living in the Providence Walkway Apartments are guaranteed the right to return to the property. Most residents will have to be relocated for more than one year due to the demolition and construction process lasting more than one year.

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

- In FYE2017 the CHA added a preference for U.S. Military Veterans for our waiting lists to receive housing assistance.
- In FYE2017 the CHA added a preference for families living in CHA public housing being converted under the RAD program to allow them to be relocated to other public housing units while their unit was being renovated.
- In FYE2017 the CHA added a preference to the Project-Based Voucher waiting list for families living in CHA public housing that will allow the CHA to relocate families in public housing to newly renovated Project-Based Voucher units.
- All of these changes were approved by the Resident Advisory Board and the CHA Board of Commissioners.

Financial Resources

- The CHA has converted 597 Public Housing units under the HUD Rental Assistance Demonstration (RAD) program during FYE2016 and FYE2017. As a result the public housing operating subsidies and capital funds for these housing units have been converted to long-term Project-Based Voucher contract funding.
- As a result of the conversion of 597 Public Housing units under the HUD RAD program, the CHA changed its fiscal year for FYE2017 from October 1 – September 30 to a fiscal year from January 1 – December 31. This has improved the financial reporting for the Columbia Housing Authority and aligned its accounting and budgeting cycle with the fiscal years of the public housing units which were renovated with Low-Income Housing Tax Credits. Low-Income Housing Tax Credits require accounting and budgeting cycles based on the calendar year of January 1 – December 31.
- The requested change in the Columbia Housing Authority's fiscal year resulted in a lengthened accounting and budgeting cycle for FYE2017 (October 1, 2016 to December 31, 2017). Following this budget cycle, the CHA's fiscal year for 2018 is now from January 1, 2018 – December 31, 2018. This same accounting and budget cycle will continue in subsequent years.

Significant Amendment

- The CHA's participation in the HUD Rental Assistance Demonstration (RAD) program is considered a significant amendment to the PHA plan. This was included as a significant amendment to the PHA plan last year and is included in this year's plan as well. [Attachment PHA Plan Amendment R - HUD RAD]

<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 checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><u>Demolition and/or Disposition</u></p> <ul style="list-style-type: none"> The CHA is planning to donate the childcare center located at 403 Park Avenue to the Columbia Public School District. The CHA owns the building and the school district owns the land underneath the center. The center is currently being used to provide a Head Start early education program and a Title I preschool. <p><u>Conversion of Public Housing to Project-Based Assistance under RAD.</u></p> <ul style="list-style-type: none"> The CHA has converted 597 Public Housing units under the RAD program by the end of FYE2017. The CHA will apply for Low-Income Housing Tax Credit funding in FYE2019 in order to convert an additional 34 Public Housing units under RAD. If funding is awarded, construction would be expected to start in late 2020 or early 2021. <p><u>Units with Approved Vacancies for Modernization</u></p> <ul style="list-style-type: none"> In association with the Public Housing units being renovated through the RAD program, the CHA has and will continue to have units that are approved vacancies for modernization. These units will be occupied as soon as renovations are complete.
<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. (FYE2015-FYE2019)</p> <p>1. PHA Goal: Expand the supply of assisted housing</p> <ul style="list-style-type: none"> The CHA applied for and received 25 Project-Based VASH Vouchers and utilized these vouchers as permanent rent assistance for Veterans participating in the HUD-VASH program. These 25 Project-Based VASH Vouchers enabled the CHA to leverage Low-Income Housing Tax Credit funding and other public and private funding sources to construct 25 one-bedroom apartments for homeless Veterans known as the Patriot Place Apartments. The CHA partnered with the Truman VA on this project and the first Veterans were moved into the apartments on April 11, 2016. The Patriot Place Apartments are 100% occupied. In FYE2015-FYE2019, the CHA applied for 42 Continuum of Care vouchers through the Balan of State Continuum of Care and received continued funding to provide housing with supportive services for homeless persons with disabilities. In FYE2016, CHA applied for and received HOME funding from the City of Columbia to assist with the renovation of the Stuart Parker Apartments and the Oak Towers Apartments. In FYE2017, CHA applied for and received HOME funding from the City of Columbia to assist with the renovation of the Bryant Walkway Apartments II. In FYE2019, CHA applied for and was recommended for HOME funding from the City of Columbia to assist with the renovation of the Providence Walkway Apartments. The CHA applied for and received AHAP funding from the Federal Home Loan Bank of Des Moines to assist with the development of the Patriot Place Apartments and the renovation of the Stuart Parker Apartments with Paquin Tower, the Bear Creek Apartments, and Oak Towers. In FYE2017, the CHA applied for AHAP funding from the Federal Home Loan Bank of Des Moines to assist with the renovation of the Bryant Walkway Apartments and Bryant Walkway Apartments II. Funding was not awarded for these projects. The CHA converted 597 units of Public Housing under the RAD program during FYE2017. Renovation of 360 of these units was completed in FYE2017. The renovation of the Oak Towers Apartments (147 units) was completed in September of 2018. The CHA was awarded 9% Low-Income Housing Tax Credit funding in December 2016 to renovate 54 public housing units referred to as the Bryant Walkway Apartments. Renovation of these apartments started in January 2018 and were completed in August 2019.

- The CHA was awarded 4% Low-Income Housing Tax Credit funding and tax-exempt bonds in December 2016 to renovate 36 public housing units referred to as the Bryant Walkway Apartments II. Renovation of these apartments started in early 2018 and were completed in December 2018.
 - The CHA submitted an application for 9% Low-Income Housing Tax Credit funding to the Missouri Housing Development Commission in March 2018 to renovate 50 public housing units referred to as the Providence Walkway Apartments. The application was not funded. The CHA will submit a new application in FYE2019 to demolish and replace 34 units of public housing known as the Providence Walkway Apartments.
 - The CHA is planning to convert its remaining 86 Public Housing units under the RAD program in the next four years. Depending on the Missouri Housing Development Commission's allocation of Low-Income Housing Tax Credits in FYE2020, the CHA may submit an application to renovate or replace some or all of these 86 final Public Housing units.
 - The CHA has expanded the number of families participating in our Public Housing and Housing Choice Voucher Program Family Self-Sufficiency programs.
- 2. PHA Goal: Improve the quality of assisted housing**
- The CHA provides monthly management reports for all departments to the CHA Board of Commissioners on a monthly basis for the purpose of informing the Board and tracking the performance of management operations.
 - The CHA has implemented the transition to a paperless record-keeping system during FYE2015 and FYE2016.
 - The CHA employs 2.5 FTE Resident Service Coordinators to provide resource and referral to our public housing and PBV assisted households.
 - The Truman VA provides a full time social worker stationed at the Patriot Place Apartments to provide supportive services to the Veterans living there.
 - As noted previously, the CHA will have converted 597 units of Public Housing under the RAD program by the end of FYE2017. In addition, the CHA is planning to convert its remaining 120 Public Housing units under the RAD program in the next five years. The CHA submitted an application for 9% Low-Income Housing Tax Credit funding to the Missouri Housing Development Commission in March 2018 to renovate 50 public housing units referred to as the Providence Walkway Apartments. These 50 units are included in the aforementioned 120 public housing units to be renovated. This application was not funded, and the CHA has scaled down the application for FYE2019 to demolish and replace 34 units of public housing known as the Providence Walkway Apartments. The CHA plans to replace the remaining 86 units of public housing in future years.
- 3. PHA Goal: Increase assisted housing choices**
- The CHA increased its payment standards for the Housing Choice Voucher Program to match 100% of the HUD established Fair Market Rent for the Boone County, Missouri MSA.
 - The CHA has added additional VASH vouchers in partnership with the Truman VA. The CHA currently administers 125 VASH Tenant-Based Vouchers and 25 VASH Project-Based Vouchers.
 - In 2018 the CHA applied for and received fourteen 811 vouchers which provide housing assistance to persons that are homeless or at risk of becoming homeless, and persons with disabilities in institutional or segregated facilities.
 - In 2019 the CHA applied for HOME funding for Tenant-Based Rental Assistance from the City of Columbia and was recommended to receive \$83,000 in funding in FYE2020.
- 4. PHA Goal: Provide an improved living environment**
- The CHA continues to employ the public housing security improvements as stated in our five-year plan. Monthly Safety Department reports document the actions of our Safety Officers and the incidents occurring on our properties.
 - Criminal activity has significantly decreased on all CHA properties and is at an all-time low. This has been accomplished through a combination of expanded Family Self-Sufficiency, Independent Living, and Family Support services provided to our Public Housing and Project-Based Voucher residents and Housing Choice Voucher Program participants along with enforcement of our Lease Addendum for Crime-Free Housing and the services provided by our Safety Department. This has resulted in a significant improvement in the living environment and quality of life for the families being served by the CHA.
 - Oak Towers continues to be designated for the elderly, age 55 and older. Paquin Tower is designated for persons with disabilities and the elderly age 55 and older.
 - The CHA plans to add additional security cameras at Oak Towers and Paquin Tower in FYE2019.
 - The CHA has multiple partnerships with community agencies that provide a variety of services and support to our residents. A short list of agencies include Big Brothers/Big Sisters, Love, Inc., Columbia Center for Urban Agriculture, Services for Independent Living, the Food Bank, Parks and Recreation, and many others.
- 5. PHA Goal: Promote self-sufficiency and asset development of assisted households**
- The CHA is partnering with the Columbia Public School District to provide adult education classes at the CHA's J.W. "Blind" Boone Community Center.
 - The CHA has expanded the Moving Ahead Program to provide a full-day program for 5 weeks during the summer in addition to the after-school program provided during the regular school year. The CHA has also expanded the number of children served to 100 children. Moving Ahead is a state-licensed program.

	<ul style="list-style-type: none"> • The CHA currently receives funding from the Boone County Children’s Services fund to provide the Healthy Homes Connection program to families with children participating in our Housing Choice Voucher Program. This program addresses the mental health needs of children and promotes emotionally healthy families. • The CHA employs two Family Self-Sufficiency Coordinators serving CHA assisted households. There are currently 123 families participating in the Family Self-Sufficiency program. • The CHA offers a free FDIC Money Smart program five times a year. The ten-week class covers a variety of topics including budgeting, repairing poor credit histories, and the homeownership process. <p>6. PHA Goal: Ensure equal opportunity and affirmatively further fair housing</p> <ul style="list-style-type: none"> • CHA staff have participated in fair housing training in the past year. • CHA will collaborate with the City of Columbia update their plan for affirmatively furthering fair housing. • CHA has partnered with the City of Columbia to provide fair housing training to those living in CHA properties. <p>7. Coordinate activities of CHA Low-Income Services, Inc. (CHALIS)</p> <ul style="list-style-type: none"> • The CHALIS staff have conducted and expanded activities with the three main goals: <ul style="list-style-type: none"> a. Helping youth succeed in school and in life; <p><i>Expanded programs include:</i> Moving Ahead After-School Program, Moving Ahead Summer Program, Going Places Teen Program, MAP for Mental Health, Healthy Homes Connection, Teen Outreach Program, and activities of the Youth Community Coalition.</p> b. Supporting families working toward self-sufficiency; and <p><i>Expanded programs include:</i> Family Self-Sufficiency Program, Resident Services Coordination, Healthy Homes Connection, Money Smart Financial Literacy, computer labs, Opportunity Gardens Program, Edible Landscaping, and the Annie Fisher Food Pantry.</p> c. Assisting seniors and persons with disabilities to live independently. <p><i>Expanded programs include:</i> Resident Services Coordination, transportation assistance for shopping and medical appointments, Annie Fisher Food Pantry & Share Shelves, Opportunity Gardens, Parks and Recreation Adaptive Recreation programs, fitness centers, computer centers, Buddy System, Nutrition and Meal programs, and Health Clinics.</p>
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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 checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>1. PHAs are required to enter into depository agreements with their financial institutions in the form required by U.S. Housing and Urban Development (HUD). The agreements serve as safeguards for Federal funds and provide third-party rights to HUD. Among the terms in many agreements are requirements for funds to be placed in an interest bearing account (24 CFR section 982.156).</p> <p>Views of Responsible Officials: The Authority has entered into a new depository agreement with the bank that holds all the Authority’s federal program funds.</p> <p>2. Criteria or Specific Requirement: HUD requires the Authority to electronically submit HUD-52681-B, Voucher for Payment of Annual Contributions and Operating Statement (OMB No. 2577-0169) on a monthly basis using the VMS system.</p> <p>Condition: The Authority did not perform a review of information submitted monthly using the VMS system to ensure information is accurate and timely.</p> <p>Cause: The Authority does not have an internal control process in place as it relates to monthly reporting.</p> <p>Effect: The possibility exists that noncompliance with federal requirements could go undetected without proper controls over compliance relating to reporting.</p> <p>Views of Responsible Officials: For monthly submissions, the Director of Finance will prepare the submissions and the Chief Executive Officer or Chief Operations Officer will review the reports submitted for completeness and timely submission.</p> <p>3. Condition: Certain tenant files did not include documentation required to support the Authority’s compliance with the annual eligibility recertification process.</p> <p>Cause: The Authority has internal controls in place related to tenant file review whereby files are second reviewed on a sample basis due to the number of participants in the program. The participant files related to the two instances described below were not randomly selected for second review.</p>
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	<p>Effect: While tenants were found to be eligible for participation in both instances, a situation could arise there a tenant is ineligible if all supporting documentation is not accurate or retained.</p> <p>Views of Responsible Officials: Authority Program staff will complete, retain and submit a File Review Checklist for Initial, Annual and Interim file data processing for review. The file review checklist will be used to ensure participant files are complete, compliant and all assistance calculations are accurate.</p> <p>There were no findings reported for the year ended December 31, 2017.</p>
Other Document and/or Certification Requirements.	
C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.2	<p>Civil Rights Certification.</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.4	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SL</u>, <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>
D Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).	
D.1	<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 2019-2023 “Capital Fund Program Five-Year Action Plan” was submitted via HUD’s EPIC (Energy and Performance Information Center) “Activity Planning Module”. HUD approved the 2019-2023 Capital Fund Program Five-Year Action Plan through EPIC on June 5, 2019.</p>

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

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

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(1\)](#)) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#)) and 24 CFR §903.12(b).

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

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

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

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

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

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

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

Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

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

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

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))

C. Other Document and/or Certification Requirements

C.1 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 SM-HP.

C.2 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

C.3 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)

C.4 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)

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

D.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. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.