

**DATA COLLECTION TOOL
FOR INFORMATION TO
COMPLETE FORM HUD 50075-
STANDARD-TROUBLED**

Housing Authority City of Orange

The following information is needed to complete the NEW form HUD-50075-ST Annual PHA Plan.

A.1 PHA Information

PHA Name: Housing Authority City of Orange **PHA Code:** TX037

PHA Type: Standard Troubled

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2017

PHA Inventory (based on ACC units at time of FY beginning above)

Number of Public Housing (PH) Units: 200

Number of Housing Choice Vouchers (HCVs): 868

Total Combined 1,068

PHA Plan Submission Type: Annual Submission Revised Annual Submission

The following are the specific locations where the public may obtain copies of the 2017 Annual Plan:

- Administrative Office – 516 Burton Street, Orange, TX 77630

PHA Consortia: (Check box if submitting a joint Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
Lead HA:					

Have the following PHA Plan elements been revised by the PHA since its last PHA Plan submission?

- (a) **Statement of Housing Needs and Strategy for Addressing Housing Needs**
- Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**
- Financial Resources**
- Rent Determination**
- Operation and Management**
- Grievance Procedures**

- Homeownership Programs
- Community Service and Self-Sufficiency Programs
- Safety and Crime Prevention (including VAWA)
- Pet Policy
- Asset Management
- Substantial Deviation
- Significant Amendment /Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review (*See attachment tx037b01*).

B.1 Revision of PHA Plan Elements.

Statement of Housing Needs and Strategy for Addressing Housing Needs

Statement of Housing Needs: *REVISION*

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	447	3	4	4	3	4	3
Income >30% but <=50% of AMI	34	3	4	4	3	4	3
Income >50% but <80% of AMI	24	3	4	4	3	4	3
Elderly	18	3	4	4	3	4	3
Families with Disabilities	42	3	4	4	3	4	3
White/Non-Hispanic	80	3	4	4	3	4	3
Black/African American/Non-Hispanic	421	3	4	4	3	4	3
Asian/ Non-Hispanic	2	3	4	4	3	4	3
Hispanic	14	3	4	4	3	4	3

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	354		
Extremely low income <=30% AMI	306	86%	
Very low income (>30% but <=50% AMI)	32	9%	
Low income (>50% but <80% AMI)	16	5%	
Families with children	314	89%	
Elderly families	8	2%	
Families with Disabilities	32	9%	
White	67	19%	
Black/African American	272	77%	
American Indian/Alaska Native	0	0%	
Asian	1	0.28%	
Native Hawaiian/Other Pacific Islander	5	1%	
Hispanic	9	3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	217	61%	
2 BR	98	28%	
3 BR	37	10%	
4 BR	2	1%	
5 BR	N/A	N/A	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 4 months Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	170		
Extremely low income <=30% AMI	141	83%	
Very low income (>30% but <=50% AMI)	21	12%	
Low income (>50% but <80% AMI)	8	5%	
Families with children	150	88%	
Elderly families	10	6%	
Families with Disabilities	10	6%	
White	13	8%	
Black/African American	149	88%	
American Indian/Alaska Native	2	1%	
Asian	1	1%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	5	3%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	
2 BR	N/A	N/A	
3 BR	N/A	N/A	
4 BR	N/A	N/A	
5 BR	N/A	N/A	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 13 months Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			

Strategies for Addressing Housing Needs *REVISION*

Need: Shortage of affordable housing for all eligible populations

The PHA shall maximize the number of affordable units available to PHA within its current resources to:

- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

The PHA *increased* the number of affordable units available to the PHA within its current resources by:

- Whispering Oaks *was completed February 2017* from 20 units to 70 units: 20 PHA, 35 TC and 15 PBV.

Need: Specific Family Types: Families at or below 30% of median

PHA shall target available assistance to families at or below 30 % of AMI by:

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Adopt rent policies to support and encourage work

Need: Specific Family Types: Families at or below 50% of median

PHA shall target available assistance to families at or below 50% of AMI by:

- Adopt rent policies to support and encourage work

Need: Specific Family Types: The Elderly

The PHA shall target available assistance to the elderly by:

- Seeking designation of public housing for the elderly

Need: Specific Family Types: Families with Disabilities

PHA shall target available assistance to Families with Disabilities by:

- Affirmatively market to local non-profit agencies that assist families with disabilities

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

PHA will increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs

The PHA will conduct activities to affirmatively further fair housing by:

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the Section 8 program to owners outside areas of poverty/minority concentrations
- Implement a Housing Mobility Program to encourage voucher holders to move to areas of greater opportunities with lower poverty rates and minority concentration

Reason for Selecting Strategies:

- Funding constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with residents and the Resident Advisory Board

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

Public Housing

(1) Eligibility

Equal Access

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (ii) An elderly family;
 - (iii) A near-elderly family;

- (iv) A disabled family;
- (v) A displaced family; and
- (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

The Housing Authority City of Orange verifies eligibility for admission to public housing at the time of unit offer.

The PHA uses the following non-income screening factors to establish eligibility for admission to public housing:

- Criminal or Drug-related activity
- Rental history
- Past relationship with PHA, if any
- Sexual Offender Registry Check
- Social Security Number Check
- Citizenship/Legal Non-Citizen Status Check
- The PHA will attempt to ascertain whether domestic violence was a factor in the poor rental and tenancy history and exercise discretion in determining suitability for tenancy, taking into consideration the circumstances that may have contributed to the negative reporting.

The Housing Authority requests criminal records from local law enforcement agencies for screening purposes:

(2) Selection and Assignment

Selection for admission to public housing shall be made from the PHA's current waiting list in accordance with date and time of application and applicable preference(s) as follows.

(3) Preferences

The PHA does not plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of the median area income.

It is the policy of the PHA that transfers will take precedence over new admissions in the following circumstances:

- Emergencies
- Over-housed
- Under-housed
- Medical justification
- Administrative reasons determined by the PHA
- Domestic Violence

The PHA plans to employ the following admission preferences for admission to public housing:

<u>Priority</u>	<u>Preference</u>
<u>50</u>	- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
<u>50</u>	- Victims of domestic violence
<u>50</u>	- Substandard housing
<u>50</u>	- Homelessness
<u>50</u>	- High rent burden (rent is >50 percent of income)
<u>5</u>	- Those enrolled currently in educational, training, or upward mobility programs
<u>50</u>	- Victims of reprisals or hate crimes
<u>50</u>	- Families whose head of household or spouse is at least sixty-two (62) years of age or disabled
<u>50</u>	- Working families (Sikes Road only)

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that the PHA will meet income targeting requirements.

(4) Unit Assignment

Applicants are ordinarily given one (1) vacant unit choice before they fall to the bottom of the waiting list. This policy is consistent across all waiting list types.

(5) Maintaining Waiting List **REVISION**

The Housing Authority City of Orange maintains a community-wide waiting list. Interested persons may apply for admission to public housing **online at www.orangha.com**.

The Housing Authority City of Orange plans to operate a site-based waiting list for Sikes Road.

(6) Occupancy

Applicants and residents may use the following reference materials to obtain information about the rules of occupancy of public housing.

- PHA-resident lease
- The PHA's Admissions and Continued Occupancy Policy
- PHA's briefing seminars or written materials

Residents must notify the PHA of changes in family composition:

- At any time family composition changes

(7) Deconcentration and Income Mixing **REVISION**

The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:

The PHA does have general occupancy public housing developments covered by the deconcentration rule.

None of the covered developments have average incomes that fall above or below the Established Income Range.

Section 8

(1) Eligibility

Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);

- (ii) An elderly family;
- (iii) A near-elderly family;
- (iv) A disabled family;
- (v) A displaced family; and
- (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

The PHA conducts screening to the extent of:

- Criminal or Drug-related activity only to the extent required by law or regulation
- Domestic Violence – Attempt to ascertain whether domestic violence was a factor in the poor rental and tenancy history or criminal activity and exercise discretion in determining suitability for tenancy about the circumstances that may have contributed to the negative reporting.

The Housing Authority requests criminal records from Local law enforcement agencies for screening purposes.

The PHA shares the following information with prospective landlords:

- Current and former landlords name and address
- Residents last known mailing address

(2) Waiting List Organization **REVISION**

The Housing Authority City of Orange's waiting list for the Section 8 tenant-based assistance is not merged with other program waiting list.

Interested persons may apply for admission to Section 8 tenant-based assistance:

- ***Online at www.orangeha.com***

(3) Search Time

The PHA does give extensions on standard 60-day period to search for a unit under the following circumstances:

- 2 additional thirty (30) day extensions can be given upon request

(4) Preferences

The PHA does not plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the Section 8 Program to families at or below 30% of the median area income.

The PHA plans to employ the following admission preferences for admission to Section 8 tenant-based assistance:

Priority Preference

- 50 - Working families (Sikes Road only)
- 50 - All public housing residents displaced as a result of demolition and/or disposition shall be given priority over all applicants on the Section 8 Waiting List for relocation housing purposes only

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that the PHA will meet income targeting requirements.

(5) Special Purpose Section 8 Assistance Programs

The policies governing eligibility, selection and admissions to any special-purpose Section 8 program administered by the PHA are contained in the following documents or other reference materials:

- The Section 8 Administrative Plan
- Briefing sessions and written materials

The PHA announces the availability of any special-purpose Section 8 program to the public through:

- Published notices

Financial Resources REVISION

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2017 grants)		
a) Public Housing Operating Fund	950,552.00	
b) Public Housing Capital Fund	204,430.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	5,431,674.00	
f) Resident Opportunity and Self- Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
2017 Replacement Housing Grant	115,757.00	Replacement housing
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income	144,333.00	Public housing operations
4. Other income (list below)		
Excess utilities	3,898.00	Public housing operations
Interest earned	2,505.00	Public housing operations
5. Non-federal sources (list below)		
Development Fees	150,484.00	Other
Total resources	\$7,003,633.00	

Rent Determination

Public Housing

(1) Income Based Rent Policies

- a. Use of discretionary policies

The PHA will employ discretionary rent-setting policies for income based rent in public housing.

b. Minimum Rent

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. The minimum rent requirement may be waived due to certain financial hardships. The request for minimum rent hardship must be made in writing to the PHA prior to the rent becoming delinquent. The PHA will verify whether the hardship claimed is temporary or long term. Payment of the minimum is suspended immediately for ninety days when a hardship is requested on one of the following conditions:
 - a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;
 - b. The family income has decreased due to changed circumstances such as loss of employment, separation, divorce, and abandonment;
 - c. The family would be evicted as a result of imposing the minimum rent requirement;
 - d. There has been a death in the family; or
 - e. There are other hardship situations determined by the PHA on a case-by-case basis, i.e. alimony, child support, etc.Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP) or Flat Rent in the public housing program.
2. If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:
 - a. Rent may be suspended, during the ninety (90) day period beginning on the day the request is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension.
 - b. The PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.
 - c. The family may not be evicted for non-payment of rent during the ninety (90)-day suspension period.
 - d. If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.

3. If the circumstances supporting the request for a minimum rent hardship exemption are long term, tenant's rent will be based on the statutory income-based rent calculation formula during the minimum rent exemption period.
4. Hardship determinations are subject to the PHA's Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.

c. Rents set at less than 30% than adjusted income

The PHA does not plan to charge rents at a fixed amount or percentage less than 30% of adjusted income.

d. Discretionary deductions and/or exclusion policies

The PHA does not plan to employ any discretionary (optional) deductions and/or exclusions policies.

e. Ceiling Rents

The PHA does not have ceiling rents.

f. Rent Re-determinations

Between annual income reexaminations, the tenant is required to report changes in income or family composition to the PHA such that the changes result in an adjustment to rent as follows:

- Within 10 days of occurrence

g. Individual Savings accounts (ISAs)

The PHA does not plan to implement individual savings accounts for residents as an alternative to the required 12-month disallowance of earned income and phasing in of the rent increase in the next year.

(2) Flat Rents

The PHA used the following sources of information in setting the market-based flat rents to establish comparability.

- The Section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Guidelines found in the 2015 Appropriations Act (PIH 2015-13) in determining the Public Housing Flat Rent schedule. PHAs will establish a flat rent for each public housing unit that is no less than 80% of the applicable Fair Market Rent (FMR)

Section 8

(1) Payment Standards

The PHA's payment standard is:

- Above 100% but at or below 110% of FMR (Desegregated housing opportunities, Young V. Martinez lawsuit)

The PHA chose this level in order to increase housing options for families.

The PHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:

- Success rates of assisted families
- Rent burdens of assisted families

(2) Minimum Rent

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. The minimum rent requirement may be waived under certain circumstances. Financial hardship status is to be granted immediately for ninety (90) days in the event of the following:

- a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;
- b. The family income has decreased due to changed circumstances such as separation, divorce, and abandonment;
- c. One or more family members have lost employment;
- d. The family would be evicted as a result of imposing the minimum rent requirement;
- e. There has been a death in the family; or
- f. There are other hardship situations determined by the PHA on a case-by-case basis, i.e. alimony, child support, etc.

Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP).

2. If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:

- a. If the hardship is determined to be temporary, minimum rent may be suspended; during the ninety (90) day period beginning on the day the request

- is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension and the HAP is again adjusted.
- b. In the case of a temporary hardship, the PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.
 - c. If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.
 - d. Note that the PHA can only suspend the minimum rent contribution. If the family is residing in a unit whose Gross Rent exceeds the Payment Standard, the family will be responsible for the excess rent.
3. Hardship determinations are subject to the PHA’s Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.

Operation and Management REVISION

(1) PHA Management Structure **REVISION**

- a. A brief description of the management structure and organization of the PHA (*see attachment tx037d01*).
- b. HUD Programs Under PHA Management **REVISION**

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	<i>175</i>	<i>24</i>
Section 8 Vouchers	<i>820</i>	107
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually)	N/A	N/A
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs (list individually)	N/A	N/A

c. Management and Maintenance Policies **REVISION**

The PHA has adopted the following policies that contain the Agency’s rules, standards, and policies that govern management, operation, and maintenance of the Public Housing and Section 8 assistance programs.

Public Housing Management:

- Admissions and Continued Occupancy Policy (ACOP) (*Updated*)
- ACOP Procedures Manual
- Fair Housing Policy
- Grievance Procedures
- Tenant Selection and Assignment Plan
- Handicapped Policy
- Termination and Eviction Policy
- Transfer and Transfer Waiting List Policy
- EIV Security Policy
- Records Retention Policy
- Fraud Policy
- Resident Initiatives Policy
- Section 3 Plan
- Pet Policy for Families
- Pet Policy for Elderly
- Procurement Policy and Procedures
- Personnel Policy
- Maintenance Plan
- Work Order System
- Pest Eradication Policy
- Uniform Inspection System
- Smoke Free Policy (*Updating*)
- Social Media Policy
- Fixed Asset Policy
- Physical Inventory & Non-Expendable Policy
- Code of Ethics Policy
- Investments Policy
- Internal Control Policy

Section 8 Management:

- Administrative Plan (*Updated*)
- Section 8 Procedures Manual

Grievance Procedures

Public Housing

The PHA has not established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing.

Residents or applicants who desire to initiate the PHA grievance Process should contact the following:

- PHA main administrative office

Section 8

The PHA has not established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982.

Section 8 applicants or assisted families who desire to initiate the informal review and informal hearing process should contact the following:

- PHA main administrative office

Homeownership Programs *REVISION*

Public Housing

The PHA does administer a homeownership program for public housing.

Activity Description:

Public Housing Homeownership Activity Description
1a. Development name: Anderson Villa 1b. Development (project) number: TX037009
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input checked="" type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99) (changed from 5(h))
3. Application status: (select one) <input checked="" type="checkbox"/> Approved ; included in the PHA's Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved , submitted, or planned for submission: 12/01/09
5. Number of units affected: 21 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Effective 10/1/2016, all homes will have closed for homeownership.

Section 8 Tenant Based Assistance *REVISION*

The PHA *will investigate the implementation of* a homeownership program for Section 8.

Community Service and Self-Sufficiency Programs REVISION

A. PHA Coordination with the Welfare (TANF) Agency.

1. The PHA has entered into a cooperative agreement with the TANF Agency, to share information and /or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937.) Verbally Only.
2. Other coordination efforts between the PHA and TANF agency include:
 - Client referrals
 - Information sharing regarding mutual clients (for rent determinations and otherwise)
 - Coordinate provision of specific social and self-sufficiency services and programs to eligible families

B. Services and programs offered to residents and participants by the Housing Authority City of Orange are as follows:

(1) General

a. Self-Sufficiency Policies

The PHA will employ discretionary policies to enhance the economic and social self-sufficiency of assisted families in the following areas:

- Public housing admissions policies

b. Economic and Social self-sufficiency programs

The PHA does not coordinate, promote or provide policies or programs for the enhancement of the economic and social self-sufficiency of assisted families.

(2) Family Self Sufficiency Programs *N/A*

C. Welfare Benefit Reductions

The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services

- Establishing a protocol for exchange of information with all appropriate TANF agencies

D. Community Service Requirement

Pursuant to section 12(c) of the U. S. Housing Act of 1937, the PHA will comply with requirements of community service by identifying the number of tenants required to perform community service, the number of tenants granted exemptions, the number of tenants in non-compliance, and the number of tenants terminated/evicted due to non-compliance.

Description of the Community Service Policy

The Housing Authority City of Orange Community Service Policy is simple and definitive of Section 512 of the Quality and Work Responsibility Act of 1998. The Housing Authority City of Orange believes that the community service requirement should not be received by the resident to be a punitive or demeaning activity, but rather to be a rewarding activity that will benefit both the resident and the community. Community service offers public housing residents and opportunity to contribute to the communities that support them while gaining work experience. The requirement is easy and rewarding and the Housing Authority provides the residents with the name of agencies, the agencies point of contact and all required paper work necessary to accomplish the monthly service.

The Community Service Policy allows the PHA to identify those residents required to participate in the community service requirement. Participants will be required to contribute 8 hours of community service each month or to participate in a self-sufficiency program for 8 hours each month. Identified residents are responsible to determine the appropriateness of the voluntary service within guidelines provide in the policy. Allowed activities that may be included are listed in the policy. Voluntary political activities are prohibited from being considered to meet the Community Service requirement. Participation in self-sufficiency activities that may be included are listed in the policy. A list of exemptions that may be claimed from the requirement is provided in the policy. Family obligations and PHA obligations are addressed in detail. Lease requirements and documentation and non-compliance are all clearly addressed.

The PHA will administer the program. The residents will work at various tasks for the Authority and organizations to fulfill the community service requirement.

The process to cure non-compliance is counseling and notifying tenants throughout the year to encourage tenants to participate. If this is unsuccessful, tenants who refuse to comply will not be allowed to renew their leases.

Community Service Implementation Report: REVISION

- Number of tenants required to perform community service: 11
- Number of tenants performing community service: 5
- Number of tenants granted exemptions: 189

- Number of tenants in non-compliance: 6
- Number of tenants terminated/evicted due to non-compliance: 0

Safety and Crime Prevention REVISION

The PHA's plan for safety and crime preventions to ensure the safety of the public housing residents is addressed below.

A. Need for measures to ensure the safety of public housing residents:

1. Description of the need for measures to ensure the safety of public housing residents.
 - Observed lower-level crime, vandalism and/or graffiti
 - Systematic removal of gas appliances to remove risk of fires and explosions in units
2. Information or data used by the PHA to determine the need for PHA actions to improve safety of residents:
 - Analysis of cost trends over time for repair of vandalism and removal of graffiti
 - Resident reports
 - PHA employee reports
 - Police reports
3. Developments that are most affected:
 - *Craig Homes*
 - *Cove Terrace*
 - *Alexander Homes*

B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year.

1. List of crime prevention activities:
 - Crime Prevention Through Environmental Design
 - *Develop* monitors *for* the affected sites
2. Developments that are most affected:
 - *Craig Homes*
 - *Cove Terrace*
 - *Alexander Homes*

C. Coordination between PHA and the police.

1. Description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities:
 - Police provide crime data to housing authority staff for analysis and action

- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Police respond to calls and clears the streets in and around Arthur Robinson

2. Developments that are most affected:

- *Craig Homes*
- *Cove Terrace*
- *Alexander Homes*

Violence Against Women Act (VAWA)

The Housing Authority City of Orange has incorporated in its PHA Plan goals and objectives, and policies and procedures the applicable provisions of the Violence Against Women and Reauthorization Act of 2013 (VAWA) to support or assist victims of domestic violence, dating violence, or stalking and provides literature to residents on how to get information about programs available.

The PHA goal to provide an improved living environment is being met by the PHA by its effort to implement measures to assist victims of domestic violence in avoiding their abusers and continuing occupancy in public housing.

Towards its effort to meet the PHA goal to promote self-sufficiency and asset development of assisted households the PHA is providing literature to residents on how to get information about programs available to assist victims of domestic violence move out of abusive situations and begin again.

In addition, the PHA has amended its policies and procedures to include language and applicable provisions of the VAWA. It is the PHA's intent to maintain compliance with all applicable requirements imposed by VAWA.

The PHA efforts may include to:

- Provide and maintain housing opportunities for victims of domestic violence, dating violence, or stalking, including allowing for the transfer to a different development;
- Ensure the physical safety of victims of domestic violence, dating violence, or stalking (whether actual or imminent threat) who are assisted by PHA; maintain compliance with all applicable requirements imposed by VAWA.
- Take appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting families or individuals assisted by PHA.

The Housing Authority City of Orange has trained its staff on the required confidentiality issues imposed by VAWA.

Finally, the PHA is providing a preference in the Public Housing program for victims of domestic violence.

Pet Policy

All residents are permitted to own and keep common domesticated household pets. Common household pet means a domesticated cat, dog, bird, gerbil, hamster, Guinea pig, and fish in aquariums.

Pet owners must agree to abide by the PHA's Pet Ownership Rules.

A refundable pet deposit of \$100.00 is required. There is not a pet deposit for birds, gerbils, hamsters or guinea pigs. The refundable deposit will be used, if appropriate, to correct damages directly attributable to the presence of the pet.

Limit of one pet per household.

Limit for birds is two (2).

Pet owner may have only a small cat or a small dog. Limitations: weight not to exceed twenty (20) pounds; height shall not exceed fifteen (15) inches. This does not apply to service animals that assist persons with disabilities.

Pet owner shall license their pet as required by law.

Pet owner must not violate any state or local health or humane laws.

Pet must be spayed or neutered.

Pet must be maintained on leash and kept under control when taken outside the unit.

Asset Management

The PHA will conduct a Physical Needs Assessment (PNA) of all AMP's within the fiscal year. The needs of the projects have been prioritized, not only based upon the PNA, but also upon needs identified during inspections performed by PHA staff and HUD REAC and during Energy Audits. A combination of these methods will determine the agency's long-term operating goals and serves as a guide in handling the agency's capital investments. The needs, as determined, will serve as the agency's guide towards developing a plan of action with regards to rehabilitation, demolition/disposition. The current plans for modernization activities are included in the agency's Annual Statement and Five-Year Action Plan.

The PHA will proceed to allocate funds, based upon funds availability, to the projects identified as a result of those efforts previously described and also based upon other current available project information pertaining to occupancy, vacancies, expenses, prior improvements and other project data.

Substantial Deviation

- Additions or deletions of Strategic Goals
- Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.

Significant Amendment/Modification

- Any change to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency* work items over \$25,000 (items not included in the latest approved Capital Fund Annual Statement or 5-Year Action Plan); and
- Any change with regard to a proposed demolition, disposition, designation of housing, homeownership, Capital Fund Financing, development, mixed financing, or conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.

This criterion does not supersede the requirements of 2 CFR Part 200 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state, or local regulations or statutes.

Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criterion.

* Emergency – means physical work items of an emergency nature, posing an immediate threat to the health and safety of residents or staff, which must be completed within one year of capital grant funding. Management improvements are not eligible as emergency work.

New Activities

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

- Hope VI or Choice Neighborhoods**
- Mixed Finance Modernization or Development**
- Demolition and/or Disposition**
- Designated Housing for Elderly and/or Disabled Families**
- Conversion of Public Housing to Tenant Based Assistance**
- Conversion of Public Housing to Project Based Assistance under RAD**
- Occupancy of Over-Income Families**
- Occupancy by Police Officers**
- Non-Smoking Policies**
- Project Based Vouchers**
- Units with Approved Vacancies for Modernization**
- Other Capital Grant Programs**

Hope VI or Choice Neighborhoods

The PHA has not received a HOPE VI revitalization grant.

The PHA does not plan to apply for a HOPE VI Revitalization grant in the Plan year.

Mixed Finance Modernization or Development *REVISION*

The PHA *has completed the* mixed-finance development activities for public housing in the *previous* Plan year as follows:

The mixed finance proposal for the redevelopment of Whispering Oaks development was approved during 2016. Pine Grove (Park Avenue Manor) construction *was completed during 2016.*

The PHA will not be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement.

Demolition and/or Disposition *REVISION*

The PHA plans to conduct demolition or disposition activities in the plan Fiscal Year.

Activity Description: The PHA submitted an amendment to the HUD approved disposition application for the Pine Grove Homes (TX037000001) housing development *and it was approved and has been completed.*

The PHA has received an approved demolition/disposition application for Arthur Robinson II (TX24T037003) and will relocate those families with a working preference to the newly developed units on the Sikes Road property. *Arthur Robinson demolition was completed and relocation took place at other complexes. At this time, there are no plans for the Arthur Robinson lot.*

Housing Development	AMP Number	Number of Units	Bedroom Distribution
Arthur Robinson	TX037000002	70	1-12 2-30 3-16 4-12
Whispering Oaks	TX037000001	20	1-1 2-10 3-7 4-2

Demolition/Disposition Activity Description	
1a. Development name: Whispering Oaks	
1b. Development (project) number: TX24T037001	
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>	
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>	
4. Date application approved , submitted, or planned for submission: <u>04/30/2015</u>	
5. Number of units affected: 20	
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development	
7. Timeline for activity: a. Actual or projected start date of activity: <u>01/15/2016</u> b. Projected end date of activity: <u>02/28/2017</u>	

Whispering Oaks:
 70 units; 20 Public Housing and 50 LIHTCs with 15 PBV units (SLR approved 04/30/2015)
was completed February 28, 2017.

Designated Housing for Elderly and Disabled Families

The PHA has not designated or applied for approval to designate but may elect to apply to designate public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or may elect to apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year.

Conversion of Public Housing to Tenant Based Assistance

The PHA does not plan to convert public housing to tenant based assistance.

Conversion of Public Housing to Project-Based Assistance under RAD

The PHA does not plan to convert public housing to project-based assistance under RAD.

Occupancy by Over-Income Families *N/A*

Occupancy by Police Officers *REVISION*

The PHA reserves the right to place Police Officers who would not otherwise be eligible in the PHA's units, if it is determined that their presence would contribute to the safety of and security of residents.

Non-Smoking Policies REVISION

Proposed Smoke Free Policy (see attachment tx037c01)

Project-based Vouchers REVISION

Our agency is currently operating a Section 8 Project Based Voucher Program. The PHA *operates 48 Project-based Vouchers at Park Avenue Manor, Willowbend and Whispering Oaks.*

Projected number of units: 25%

The PHA has applied for project-based vouchers at two (2) of the new developments. Pine Grove submitted a SLR to HUD for 16 PBV units and received approval on 08/13/2014. The PHA will also be submitting a SLR to HUD for 15 PBV units at the Whispering Oaks site. A letter was mailed to Orange Redevelopment AR II, LP C/O Orange Redevelopment II Corporation in April 2014.

Should the PHA receive Tenant Protection vouchers for any units demolished or disposed, the PHA anticipates issuing request for proposal for project-based voucher assistance for these units.

General location(s) (eligible census tracts or areas within eligible census tracts):

- Census Tract 202 and Census Tract 205

The PHA has included project-based units for the purpose of building more affordable housing and the number of project units allowed under HUD regulations.

Site Selection Policy

The site selection policy and procedures herein promote the PBV goals by ensuring the supply of assisted rental housing is expanded while being in compliance with the Section 8 Project-based Voucher Program Final Rule.

- A three (3) member team of the PHA staff will review, evaluate and recommend a proposal. Proposals will not be opened until after the submission deadline.
- The PHA is under no obligation to award a PBV to any proposal received.
- As appropriate the Executive Director shall recommend a proposal to the Board of Commissioners (BOC), subject to the proposed site passing environmental. Review requirements at 24 CFR 983.58.
- The agency will establish written evaluation criteria. The evaluation will be in two (2) steps:
 - 1) Proposals must first meet written qualifying factors required in a HUD regulation or a HUD notice. Proposals not meeting the qualifying factors will not be evaluated/rated in the second tier. A qualifying factor form will be prepared listing each factor and the results of the qualifying factor review for

each item and the signature of the person performing the review. The October 15, 2005, Project-based Voucher Program lists the following factors:

- a) The proposal was received by the deadline.
 - b) The property is eligible housing (24 CFR sections 983.53 and 983.54). The PHA will confirm the proposed units are not part of the list of prohibited units.
 - c) The proposal complies with the cap on the number of PBV units per building (24 CFR section 983.56)
 - d) The proposal meets the Site Selection standards (24 CFR 983.57)
 - e) The proposal meets zoning requirements
 - f) The site is consistent with the goal of deconcentrating poverty and expanding housing opportunity pursuant to elements listed at 24 CFR section 983.57(b)(1). The PHA will use a form to document that each of the seven (7) items listed were considered.
 - g) The site facilitates compliance with Civil Rights Requirements listed at 24 CFR section 983.57(b)(2).
 - h) The site meets HQS site standards at 24 CFR 982.401(l)
 - i) If needed, the proposal passes the HUD subsidy layering review pursuant to 24 CFR 983.55.
- 2) Proposals meeting all Qualifying Factors are then evaluated based upon the PHA's Evaluation Selection Criteria:
- a) The Evaluation Selection Criteria will be consistent with HUD regulations and guidelines, including 24 CFR 983.57 (d) and (e).
 - b) The criteria will be written and adopted by the Board of Commissioners prior to the first Public Notice.
 - c) Each criteria will be assigned a maximum point value indicative of its relative importance.
 - d) An Evaluation Selection Criteria rating sheet will be prepared, listing each criteria, the maximum points, the points awarded for each criteria, the total points awarded, voluntary comments, the name of the reviewer and the date of the review.
 - e) Each proposal will be independently rated by each evaluator over the same period of time.
 - f) The evaluation team may meet to determine a recommendation.
 - g) The agency is not obligated to select the highest rated proposal if a reasonable explanation can be provided to the BOC.
 - h) If appropriate, PHA quality and design requirements in addition to Housing Quality Standards pursuant to 24 CFR 983.100(e) may be included as a rating factor.
 - i) The results of pre-selection inspection of existing units pursuant to 24 CFR 983.103(a) will be an evaluation/rating factor if existing units are being considered.
 - j) Evidence of financial commitment as compared to construction/rehabilitation cost and debt service may be a rating factor.
 - k) An operation cash flow projection may be a rating factor.

- 1) A written Management Plan describing how the owner will fulfill the occupancy and maintenance requirements may be a rating factor.
- 3) For proposals with omissions or discrepancies, applicants will be notified by letter and will be allowed ten (10) business days to correct or complete the proposal. If the corrections or additional requested information is not received by the deadline, the proposal will be considered incomplete and rejected.
- 4) Within seven (7) calendar days of BOC approval, the PHA will provide written notification of the selected proposal(s) to all parties submitting a proposal.
- 5) Within fourteen (14) calendar days of BOC approval, the PHA will publish a public notice announcing the parties selected to receive PBV in the same newspaper in which the Public Notice of Agency Request for PBV Proposals was published.
- 6) If the PHA has any direct or indirect interest in selected proposals, the PHA will request the selection process be reviewed by the local HUD Field Office or HUD approved independent entity, to determine the proposal was appropriately selected based on the selection procedures specified in the PHA Section 8 Administrative Plan. The requirements at 24 CFR 983.59 for independent entity to perform the inspection, reasonable rent determination and determination of initial occupant rent shall be followed.
- 7) Documentation regarding the basis for the proposal selection will be made available at the Executive Director's office under the control of an assistant to the Executive Director for at least three (3) years from the date the BOC approved the proposal.

Units with Approved Vacancies for Modernization N/A

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

Civil Rights Certification: Form HUD-50077, PHA Certifications of Compliance with the PHA and Related Regulation, must be submitted by the PHA as an electronic attachment to the PHA Plan.

Most Recent Fiscal Year Audit

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If, yes, please describe: N/A

Progress Report

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

Mission

The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

Goals/Objectives

PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #1:

- Reduce public housing vacancies
- Leverage private or other public funds to create additional housing opportunities
- Acquire or build units or developments

Progress Statement:

- *Agency has reduced vacancy by meeting with management bi-weekly to check status of units and the need for applicants. Using a new tool to track to units from vacancy to lease to turnaround within no more than 30 days*
- *Construction was completed at Whispering Oaks and Park Avenue during fiscal year ending 2016*
- *HACO meets regularly with Property Management Company for the mixed-finance complexes to ensure understanding and compliance related to occupancy, rent collection, property conditions and evictions/termination procedures*

PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #2:

- Improve public housing management
- Improve voucher management
- Increase customer satisfaction
- Renovate or modernize public housing units
- Demolish or dispose of obsolete public housing
- Provide replacement public housing

Progress Statement:

- *Training conducted bi-weekly with PH management staff to discuss rent collection, occupancy, recertifications, PIC errors and services for families in the communities*
- *Training conducted with the Section 8 Department to discuss program operations, policies, HQS, recertifications and PIC errors*
- *File reviews for both programs have increased to no less than 75% of the files*

- *The staff has attended training associated with HCV Executive Management, Public Housing Management Certification, Rent Calculation of entire PH and Section 8 Programs; Eligibility and Occupancy, Nelrod Consortium, Section 3, Tax Credit Specialist, Sexual Harrassment, Public Housing Executive Training (Texas Housing Association) and Texas NAHRO. The staff is scheduled to attend introduction to Mixed-Finance to PHA's and Public Investment.*
- *Distributed survey to PH families in reference to services they would like to have received 7% of the surveys back. Will continue to survey the residents for suggestions on programs for the families at each site.*
- *HACO demolished Arthur Robinson during 2016 and there are no plans for additional demolition of units*
- *HACO will begin replacement of AC units at Craig Homes, Cove Terrace and Alexander Homes*
- *HACO will begin replacing the roof Alexander Homes*

PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES

The PHA established the following objectives to strive in meeting goal #3

- Conduct outreach efforts to potential voucher landlords
- Implement voucher homeownership program
- Implement public housing or other homeownership programs
- Convert public housing to vouchers
- RAD

Progress Statement:

- *The HCV Program will begin hosting annual landlord workshops to discuss Fair Housing, HQS, HAP Contract, Tenant Screening and Evictions*
- *HACO will investigate membership in the Southeast Texas Apartment Association to market the Public Housing units as well as recruit additional landlords for the HCV Program*
- *The Housing Authority is currently looking to secure partnerships with lenders, realtors to establish the HCV Homeownership Program*
- *At this time HACO does not have any plans to convert Public Housing to vouchers*
- *HACO is still investigating the feasibility of the RAD Program*

PHA GOAL #4: PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS

The PHA established the following objectives to strive in meeting goal #5

- Increase the number and percentage of employed persons in assisted families

Progress Statement:

- *HACO is currently developing relationships with partners to assist with increasing employment with assisted families by creating a Work Force Development Program.*

- *HACO will investigate the ability to collaborate with the Chamber of Commerce and Small Business Institutes in the area to host workshops related to Section 3 hiring and the Procurement process*
- *HACO will investigate the feasibility to become a member of the Realtors Association to expand the landlord's opportunities for the Section 8 Program as well as introduce the Section 8 Homeownership Program to potential business partners*

PHA GOAL #5: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING

The PHA established the following objectives to strive in meeting goal #5

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required

Progress Statement:

- *HACO continues to undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability*
- *HACO continues to undertake affirmative measures to provide a suitable living environment for families living in assisted housing regardless of race, color, religion, national origin, sex, familial status and disability*
- *HACO continues to undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required*

Resident Advisory Board (RAB) Comments

Did the RAB(s) provide comments to the PHA Plan? (See attachment tx037a01)

Y N

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.

Troubled PHA

Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y N N/A

If yes, please describe: *(See attachment tx037e01)*

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).

- 1) 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.

See HUD Form 50075.2 approved by HUD on 07/21/2016

Challenged Elements –