Streamlined Annual PHA Plan (HCV Only PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

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

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

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 <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and 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	Number of Housing Choice Vor PHA Plan Submission Type: Availability of Information. It A PHA must identify the specificand proposed PHA Plan are avaireasonably obtain additional infosubmissions. At a minimum, Ptencouraged to post complete PH Copies of the PHA Plan Montpelier, Vermont 05 jennifer.gray@vsha.org PHA Consortia: (Check box	inning: (MM/ ual Contribution ouchers (HCV Annual Sub- in addition to the ic location(s) will able for inspectormation of the HAS must post IA Plans on the are available 602, online	ons Contract (ACC) units at time of 4057 omission Revised An et items listed in this form, PHAs my where the proposed PHA Plan, PHA extion by the public. Additionally, the PHA policies contained in the star PHA Plans, including updates, at the star PHA PLANS	nual Submission nust have the elements listed below Plan Elements, and all information the PHA must provide information and Annual Plan but excluded the main office or central office of the office located at One intacting Jennifer Gray and annual Plan but excluded the main office or central office of the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One intacting Jennifer Gray and provide the office located at One interest of the office located at One intere	tion relevant to the public hearing on on how the public may from their streamlined of the PHA. PHAs are strongly Prospect Street,
В.	Plan Elements.				

1	Revision of Existing PHA Plan Elements.
	a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?
	Y N □ Statement of Housing Needs and Strategy for Addressing Housing Needs. □ □
	(b) If the PHA answered yes for any element, describe the revisions for each element(s):
	Statement of Housing Needs and Strategy for Addressing Housing Needs:
	The VSHA meets the housing needs of families with extremely low-income (24 CFR 5.603), households including individuals who are elderly and those with disabilities, victims/survivors of domestic violence and other vulnerable populations residing in our jurisdiction, or on the waiting list, by working collaboratively with State and local community partners to expand the supply of available, affordable, and safe housing. Whenever possible, we seek to form community partnerships which provide supportive services to vulnerable families and increase the likelihood of successful tenancy.
	Like many other states, Vermont is experiencing a housing crisis. The rate of homelessness in Vermont was 2 nd highest in the U.S., according to HUD's 2023 Annual Homelessness Assessment Report. Roughly 3,300 people were experiencing homelessness in Vermont during the 2023 point-in-time count. Vermont had the greatest percentage increase in homelessness in the country between 2007 and 2023 (218%) and also experienced the largest increase in experiences of family homelessness since the pandemic began, increasing by 213% (794 more people) since 2020.
	With many of the time-limited, pandemic era rental assistance programs exhausted, more than 15% of Vermont households are considered "severely rent burdened" which means they are paying greater than 50% of their household income toward housing costs. These families are at increased risk of housing instability, eviction and homelessness. Additionally, a statewide vacancy rate around 3% makes it nearly impossible to find affordable housing.
	There have been no updates to the State of Vermont Agency of Commerce and Community Development's Housing Needs Assessment since 2020 and the State of Vermont Consolidated Plan is currently in draft form. VSHA will incorporate relevant data and information once the final plan is available.
	VSHA is in the process of gathering waiting list data.

The VSHA intends to apply for additional rental vouchers when opportunity arises, additional information can be found in the 2024-2028 Five Year Plan.

The VSHA continues to leverage private and public funds to create additional housing opportunities through the expansion of our project-based voucher program.

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

The VSHA regularly evaluates our policies that govern participant eligibility, selection, and admission, to include admission preferences and occupancy policies that pertain to housing units assisted under Section 8.

From October 18, 2023 through December 22, 2023, in response to two devastating floods, VSHA opened it's waiting list for families who were displaced due to flood, fire, natural disaster or condemnation (Disaster Preference).

On March 15, 2024, VSHA expanded eligibility for the HUD VASH program to include "low-income" applicant families (80% AMI) in hopes of broadening the pool of eligible families and increasing program utilization.

On April 1, 2024 VSHA opened it's HCV waiting list to families who are eligible for the Disaster and Move-Up Preferences to target the on-going needs of Vermonter's impacted by flooding and to support the transition from VSHA administered, time-limited rental assistance to permanent rental subsidies.

On July 17, 2024, the VSHA Board of Commissioners will be asked to consider / approve a change to our preferences policy. They will be asked to consider / approve the following changes: to adopt a preference to serve families who are currently participating in time-limited, state-funded rental assistance programs, such as the Vermont Rental Subsidy (VRS) program. This expanded Move Up preference has the potential to preserve affordable housing for up to 120 eligible families across the PHA's jurisdiction.

Financial Resources

	2024	2023
Section 8 Tenant Based Assistance Programs:	\$43,085,330.00	\$37,481,037.00
Resident Opportunity and Self-Sufficiency Grants:	\$357,751.00	\$261,343.00
Continuum of Care:	\$809,999.00	\$1,083,044.00
Section 8 Project Based Assistance Programs:	\$32,562,878.00	\$32,775,085.00
Property Management Fees:	\$1,466,948.00	\$1,373,618.00
Property Rental/Tenant Income:	\$9,681,252.00	\$1,557,518.00
VERAP	\$36,675,906.00	
Miscellaneous Income:	\$339,075.00	\$588,289.00
Interest Income:	\$295,027.00	\$88,959.00
Total Sources	\$125,274,166.00	\$75,208,893.00

Please note that the large discrepancy between 2023 and 2024 reflects the addition of the state-funded Vermont Emergency Rental Assistance Program (VERAP) as well as the entire Housing Foundation Inc. (HFI) portfolio which was added to VSHA's audit this year.

Significant Amendment or Modification:

VSHA will update the definition of *Changes to Admissions Policies* to read as follows: including the creation or elimination of any local preference (minor modifications to expand preferences will not be considered "significant" changes) and to remove the following "Additions of new activities/programs or the omission of any existing activity or program."

B.2 New Activities. – Not Applicable

VSHA will continue to exercise the option of expanding the Project-Based Voucher Program with plans to make awards/commitments to approximately eight (8) additional housing communities totaling 21 Project-Based Vouchers, designated for homeless households.

B.3 Progress Report.

Please refer to the 5-Year PHA Plan effective October 1, 2024.

B.4 Capital Improvements. – Not Applicable

B.5 Most Recent Fiscal Year Audit.

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

Y N N/A □ ⊠ □

(b) If yes, please describe:

C. Other Document and/or Certification Requirements.

C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N □ ⊠
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan?
	Y N O
	If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
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		actions for Preparation of Form HUD-50075-HCV
Aı	nnu	al PHA Plan for HCV-Only PHAs
A.	PHA	A Information. All PHAs must complete this section. (24 CFR §903.4)
	A.1	Include the full PHA Name , PHA Code , PHA Type , PHA Fiscal Year Beginning (MM/YYYY), Number of 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.
		PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))
В.	Plai	n Elements. All PHAs must complete this section. (24 CFR §903.11(c)(3))
		Revision of Existing PHA Plan Elements. PHAs must:
		Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."
		□ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing
		needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))
Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (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 HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support 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 rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))
□ Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).
☐ Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))
☐ Homeownership Programs . A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(I)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(I)(iii)).
☐ 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.
If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.
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 §903.11(c)(3), 24 CFR §903.7(r)(1))
Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i))

- **B.2**
- **B.3**
- **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 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
 - C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
 - C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with

any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides 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 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 6.02 hour 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