

# 5-Year PHA Plan (for All PHAs)

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, 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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A. PHA Information.																															
A.1	PHA Name: <u>Housing Authority of Covington, KY</u>		PHA Code: <u>KY002</u>																												
PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2025-2029</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission																															
<p><b>Availability of Information.</b> 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 on 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 websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Annual Plan is available for review on the agency website at <a href="http://www.hacov.org">www.hacov.org</a>. Hard copies are also available at the Central Office, 2300 Madison Ave., Covington, KY 41014; and the Latonia Terrace and Golden Tower property management offices. Copies are provided to the City of Covington, the Kenton County Library/Covington Branch, Legal Aid of the Bluegrass/Covington Office, Neighborhood Investment Partners (NIP); and Wallick Communities/River's Edge at Eastside Pointe through electronic and/or hard copies.</p> <p>Resident Advisory Board/Resident Council Presidents met with agency staff on 1/24/25 to discuss updates to the agency's Annual Plan, effective 7/1/25. Residents may access full hard copies of the Annual Plan through each of the property management offices.</p> <p><input checked="" type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.) KY002 (PH) and KY133 (HCV) have operated under a consortia agreement for over 15 years. A consolidation plan was submitted to HUD in March 2024. We are awaiting HUD's response.</p> <p>KY133 currently administers 133 project-based vouchers for KY002: Academy Flats (2), Eastside Revitalization I (18), Eastside Revitalization II (25), Eastside Revitalization III (25) and Lincoln Grant Scholar House (45). In the future, the number of PBV units may increase, pending HUD approval of RAD conversion applications for Emery Drive (12), Eastside Revitalization II (8) and Eastside Revitalization III (6).</p>																															
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**B. Plan Elements.** Required for all PHAs completing this form.

**B.1 Mission.** State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.

PHA1 is committed to creating better neighborhoods by innovatively providing diverse housing opportunities for individuals and families in partnership with the greater community. These communities are focused on opportunities for our residents to flourish by achieving self-sufficiency.

PHA2's purpose is to assist eligible elderly, disabled and/or very – low-income households to obtain decent, safe and sanitary housing.

B.2

**Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

**PHA1 and PHA2 Strategic Goals 2024-2028:**

**Goal 1: Strengthen the housing portfolio by disposition of obsolete assets, modernization of high demand assets, and consolidation of the public housing and housing choice voucher programs.**

- PHA1 will soon be in a position to sell City Heights, which was approved for disposition by HUD 9/30/21. Sales proceeds will be used to fund modernization of our other PHA properties, particularly Latonia Terrace which was completed in 1939. As such, it is likely PHA1 will need to request that units at Latonia Terrace, and potentially other sites, be taken off-line for extensive modernization in the years ahead. We project that plans will call for a systematic approach to modernization so only a manageable number of buildings/units are taken off-line at the same time modernization.
- PHA1 and PHA2 are working toward consolidation. Both Boards of Commissioners approved consolidation in 12/2023. We submitted a request for consolidation on 3/29/24. No response from HUD to-date. The goal with consolidation is to merge the two PHAs for greater operating efficiencies, better customer service, financial sustainability, and increased opportunities to expand and maintain decent, safe, and affordable housing. Effective 7/1/24, both PHAs entered into a MOA for PHA1 to assume management oversight of PHA2's HCV administration
- PHA1 transferred management responsibilities for Emery Drive (69 units, 12 public housing and 57 market rate) to Neighborhood Investment Partners (NIP) in 2021. PHA1 subsequently transferred management responsibilities for Eastside Revitalization II (33 units, of which 8 are public housing and 25 are PBV units) and Eastside Revitalization III (31 units, of which 6 are public housing and 25 are PBV units) to NIP on 1/1/2022. ESR II and ESR III are tax credit properties. As agency funding and staffing capacity diminish with the disposition of City Heights, we are finding it necessary to reduce the size of our portfolio and simplify agency operations.
- PHA1 is working on a disposition application for one non-tenant, commercial property – 1016 Greenup St., Covington, KY 41011. The property was formerly used for office space for resident support services. However, it has primarily stood vacant for much of the last 5+ years. The property was acquired for \$1.00 from the City of Covington in the 1990's. Once approved for disposition, we intend to sell the property as is, with the sales proceeds going toward modernization of our properties.

**Goal 2: Expand affordable housing opportunities in the region.** PHA1 will seek new partnerships that promote quality, affordable housing in the Northern Kentucky market. PHA1 may apply for a Choice Neighborhoods Planning Grant. PHA2 will continue to strive to expand the number of landlords participating in the HCV program.

**Goal 3: Analyze PHA1 and PHA2 processes to maximize efficiency and effectiveness of operations.**

Work continues to fine-tune and enhance existing and new software programs. PHA1 and PHA2 implemented Skysite software in 2023 and 2024, respectively, to archive all tenant files. New tenant information and existing tenant updates will be archived electronically. Such a tool will help both PHAs save time and storage space.

**Goal 4: Identify revenue and cost reduction strategies for improved fiscal performance.** PHA1 is looking to automate many operations in 2025, such as vendor payments, on-line rent payments, on-line applications and re-certifications, and on-line work orders.

**Goal 5: Strive toward continuous improvement and achievement of high performer status in both PHAS and SEMAP annually.** PHA1 senior staff participated in PHAS training in 2023. Succession and Staff Development Plans are in progress for senior staff. Many key positions will be retiring in the next 2-4 years.

See HUD 50075-ST – Annual Plan, B.1-4 for more information.

B.3	<p><b>Progress Report.</b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><b>Goal 1: Strengthen the housing portfolio by disposing of obsolete assets, modernization of high demand assets, and consolidation of the public housing and housing choice voucher programs.</b> RAD conversion plans for three developments, a HCV consolidation request, efforts to sell City Heights and target the proceeds for modernization initiatives, and submission of a disposition application for 1016 Greenup are all underway.</p> <p><b>Goal 2: Expand affordable housing opportunities in the region.</b> PHA1 has placed expansion on hold to work continue efforts for Goal #1. PHA2 continues efforts to recruit new landlords to the HCV program.</p> <p><b>Goal 3: Analyze PHA1 and PHA2 processes to maximize efficiencies and effectiveness of operations.</b> Both PHAs continue to archive tenant records electronically.</p> <p><b>Goal 4: Identify revenue and cost reduction strategies for improved fiscal performance.</b> We are contemplating changes to organizational structure, job descriptions, # of staff, etc. to improve efficiencies.</p> <p><b>Goal 5: Strive toward continuous improvement and achievement of high performer status with both PHAS and SEMAP annually.</b> PHA1 is working to improve its PHAS-Financial indicator scores by evaluating systems, processes and policies. We have hired a consultant to assist the Finance Department. We appealed our FYE2023 PHAS-Financial Indicator score on 10/1/24, but have not received a response from HUD.</p>
B.4	<p><b>Violence Against Women Act (VAWA) Goals.</b> Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>PHA1 and PHA2 fully comply with the Violence Against Women Act (VAWA). It is our objective to work with others to prevent offenses covered by VAWA to the degree we are able.</p> <p>We work closely with local non-profits positioned to serve child or adult victims of domestic violence, dating violence, sexual assault, stalking, physical neglect and emotional abuse. These agencies include but are not limited to: Welcome House, Ion Center (formerly Women's Crisis Center), Child Protective Services, and Adult Protective Services.</p> <p>PHA1 has a wait list preference for victims of domestic violence and a trespass list for abusers. PHA2 gives preference points to families in the Safe Havens program.</p> <p>We periodically partner with local non-profits to co-sponsor seminars/ webinars on issues surrounding domestic violence, abuse, and neglect.</p> <p>VAWA is discussed at new tenant orientations and covered again during re-certification.</p> <p>PHA1 issues tenants a Resource Directory that contains agency information for those who offer crisis and support services</p> <p>VAWA is also covered in each PHA's ACOP and Administrative Plans.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan</p> <p>NA</p>
C.2	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?  Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>Notes were taken from the RAB meeting on 1/24/25. They are included with form 50075-ST. Residents expressed concerns about a lack of parking. They also expressed the need for new windows and mailboxes at our senior high rise residential building. The latter are included in the Capital Fund Plan. Parking remains an issue as space is limited and guest parking has been increasing. PHA1 staff will address with stricter parking enforcement</p>

C.3	<p><b>Certification by State or Local Officials.</b></p> <p>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.</p>
C.4	<p><b>Required Submission for HUD FO Review.</b></p> <p>(c) Did the public challenge any elements of the Plan? (Section C.4. will be completed following the conclusion of the 45-day public comment period, from 2/14/25 - 3/31/25)</p> <p style="text-align: center;">Y   N  <input type="checkbox"/> <input type="checkbox"/></p> <p>(d) If yes, include Challenged Elements.</p>
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>

D.1

**Affirmatively Furthering Fair Housing.** (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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

**Fair Housing Goal:** Assist the City of Covington in the Recruitment of Community Participants for the AFFH evaluation process

*Describe fair housing strategies and actions to achieve the goal*

TBD in collaboration with the City of Covington and Community Participants

**Fair Housing Goal:** Assist the City of Covington in the documentation and analysis of AFFH issues within the jurisdiction

*Describe fair housing strategies and actions to achieve the goal*

TBD in collaboration with the City of Covington and Community Participants

**Fair Housing Goal:** Assist the City of Covington with completion of the AFFH Assessment Tool

*Describe fair housing strategies and actions to achieve the goal*

TBD in collaboration with the City of Covington and Community Participants



## Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

### A. PHA Information. All PHAs must complete this section. (24 CFR § 903.4)

- A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), Five-Year Period that the Plan covers, i.e. 2019-2023, PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

### B. Plan Elements.

- B.1 **Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))
- B.2 **Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR § 903.6(b)(1))
- B.3 **Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR § 903.6(b)(2))
- B.4 **Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

### C. Other Document and/or Certification Requirements.

- C.1 **Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32, REV 2.

#### C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit 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 § 903.17(b); 24 CFR § 903.19)

#### C.3 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.4 Required Submission for HUD FO Review.

Challenged Elements.

- (a) Did the public challenge any elements of the Plan?
- (b) If yes, 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.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, 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.





<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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**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-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both 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 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.

<b>A.</b>	<b>PHA Information.</b>
A.1	<p>PHA Name: <u>Housing Authority of Covington, KY</u> PHA Code: <u>KY002</u>          PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA          PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u>          PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)          Number of Public Housing (PH) Units <u>490</u> Number of Housing Choice Vouchers (HCVs) <u>1265</u> Total Combined Units/Vouchers <u>1755</u>          PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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. 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>The Annual Plan is available for review on the agency website at <a href="http://www.hacov.org">www.hacov.org</a>. Hard copies are also available at the Central Office, 2300 Madison Ave., Covington, KY 41014; and the Latonia Terrace and Golden Tower property management offices. Copies are provided to the City of Covington, the Kenton County Library/Covington Branch, Legal Aid of the Bluegrass/Covington Office, Neighborhood Investment Partners (NIP); and Wallick Communities/River's Edge at Eastside Pointe through electronic and/or hard copies.</p> <p>Resident Advisory Board/Resident Council Presidents met with agency staff on 1/24/25 to discuss updates to the agency's Annual Plan, effective 7/1/25. Residents may access full hard copies of the Annual Plan through each of the property management offices.</p> <p><input checked="" type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below): KY002 (PH) and KY133 (HCV) have operated under a consortia agreement for over 15 years. A consolidation plan was submitted to HUD in March 2024. We are awaiting HUD's response.</p> <p>KY133 currently administers 133 project-based vouchers for KY002: Academy Flats (20), Eastside Revitalization I (18), Eastside Revitalization II (25), Eastside Revitalization III (25) and Lincoln Grant Scholar House (45).</p> <p>In the future, the number of PBV units may increase, pending HUD approval of RAD conversion applications for Emery Drive (12), Eastside Revitalization II (8), and Eastside Revitalization III (6).</p> <p>Analyses of local Housing Needs, based on Waitlist statistics, is included in Exhibits 1 and 2 attached.</p>

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
<b>Lead PHA:</b> PHA1: Housing Authority of Covington (MOA agreement for KY002 to manage KY133, eff. 7/1/24, was signed 4/19/24 while we await HUD approval for consolidation)	KY002	Public Housing Program	None	490	
PHA2: City of Covington/ Housing Department	KY133	Housing Choice Voucher/Section 8 Program	None		1265

**B. Plan Elements**

**B.1 Revision of Existing PHA Plan Elements.**

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

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- De-concentration 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.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

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

**Financial Resources:** Due to the disposition of City Heights, operating funds have decreased substantially. Significant cost-cutting strategies, as well as creative solutions for increased tenant and grant revenue, will be necessary for long-term sustainability.

**Rent Determination:** Market analyses are conducted annually and are used to update Flat Rent schedules.

**Operation and Management:** Minor lease, ACOP and tenant charge schedules have been made for improved fiscal and process efficiencies. Adjustments have been made to tenant charge schedules for maintenance and pest-control. We have adopted the required HOTMA regulations and continue to monitor for additional HOTMA regulations as they become available.

As an agency, PHA1 continues to work toward high performer status, with the goal of eventually attaining the MTW designation. PHA2 maintains a high performer status.

**Community Service and Self-Sufficiency Programs:** KY002 applied for and was awarded a combined FSS grant for both the public housing and the HCV programs.

**Asset Management:** PHA1 completed relocation of City Heights tenants in 4/2024, following disposition approval in 9/2021. The property will be sold, and sales proceeds will be used to renovate other developments in our portfolio, particularly Latonia Terrace. In the meantime, we are working with the Kentucky Heritage Council and the City of Covington's Historic Preservation Specialist to draft a MOA that will preserve the historic significance and minimize the "adverse effects" of future demolition in City Heights.

(c) The PHA must submit its De-concentration Policy for Field Office review.

**De-concentration Policy:** PHA1's developments are not subject to de-concentration requirements per 24 CFR 903, due either to size (fewer than 100 units), elderly designation, or having only one general occupancy development exceeding the 100-unit threshold. Nevertheless, PHA1 will affirmatively market its housing to all income groups and monitor the average income of all families in all covered developments on an annual basis.

**B.2 New Activities.**

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

Y N

- 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 Rental Assistance or Project-Based Vouchers under RAD.
- Occupancy by Over-Income Families
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

Disposition: PHA1 is working on a disposition application for one non-tenant, commercial property – 1016 Greenup St., Covington, KY 41011. The property was formerly used for office space for resident support services. However, it has primarily stood vacant for much of the last 5+ years. The property was acquired for \$1.00 from the City of Covington in the 1990's. Once approved for disposition, we intend to sell the property as is, with the sales proceeds going toward modernization of our properties.

Conversion of Public Housing to Project Based Vouchers under RAD: On 1/1/2022, PHA1 transferred property management responsibilities for three developments to Neighborhood Investment Partners (NIP). The three developments included: Emery Drive (69), Eastside Revitalization II (33) and Eastside Revitalization III (31). Of these 133 units, 26 are public housing. PHA1 applied for RAD conversion in the fall 2024. We were notified by HUD on 12/30/24 that all three applications for RAD conversion were approved. We will continue to work toward completing the RAD conversion process of these properties in the coming months.

Additional RAD conversions are also under consideration for other public housing and mixed finance properties in our portfolio, particularly for New Site Properties and Eastside Revitalization I.

Units with Approved Vacancies for Modernization: Latonia Terrace, our largest general occupancy development, was built in 1939. The property needs extensive modernization, of windows, stacks, kitchens and baths. We intend to do a phased modernization plan, of windows, then unit renovations. This will require buildings/units to be taken off-line for modernization and may impact families to be temporarily displaced. Documentation to take units temporarily off-line in PIC for modernization will be submitted in the 1Q2025.

Other Capital Grant Programs: PHA1 intends to apply for an Emergency Safety and Security Grant (ESSG) to include emergency conditions caused by NSPIRE deficiencies.

**B.3 Progress Report.**

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

**Goal 1:** Strengthen the housing portfolio by disposing of obsolete assets, modernization of high demand assets, and consolidation of the public housing and housing choice voucher programs. RAD conversion plans for three developments, a HCV consolidation request, efforts to sell City Heights and target the proceeds for modernization initiatives, and submission of a disposition application for 1016 Greenup are all underway.

**Goal 2:** Expand affordable housing opportunities in the region. PHA1 has placed expansion on hold to work continue efforts for Goal #1 PHA2 continues efforts to recruit new landlords to the HCV program.

**Goal 3:** Analyze PHA1 and PHA2 processes to maximize efficiencies and effectiveness of operations. Both PHAs continue to archive tenant records electronically.

**Goal 4:** Identify revenue and cost reduction strategies for improved fiscal performance. We are contemplating changes to organizational structure, job descriptions, # of staff, etc. to improve efficiencies.

**Goal 5:** Strive toward continuous improvement and achievement of high performer status with both PHAS and SEMAP annually. PHA1 is working to improve its PHAS-Financial indicator scores by evaluating systems, processes and policies. We have hired a consultant to assist the Finance Department. We appealed our FYE2023 PHAS-Financial indicator score on 10/1/24, but have not received a response from HUD.

**B.4 Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

A summary of the 5YCF Plan for 2025-2029 was presented to the Resident Advisory Board on 1/24/25 and made available for public viewing for 45 days (2/14/25- 3/31/25.) The 5YCF Plan 2025-2029 and Annual Plan will be presented to the BOC for approval on 4/16/25. All required Annual Plan documents will thereafter be submitted electronically to HUD on 4/17/25. The Procurement Officer/Capital Asset Manager will submit the same CF Plan in EPIC for HUD Field Office Review.

The previous 5YCF Plan for 2024-2028 was approved by Jared Ison, HUD/Louisville Field Office on 12/19/24.

B.5	<p><b>Most Recent Fiscal Year Audit.</b></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: The FYE23 audit found that due to staff turnover and accounting software challenges, some of the agency's internal controls for accurate and timely reporting of financial statements required modification. Additionally, two tenant files within the sample audit had income not properly verified or calculated.</p> <p>The agency agreed with the findings of the FYE23 audit and has worked to modify internal controls and increase oversight.</p> <p>The FYE24 audit is still in progress as of this writing (2/7/25.)</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>Meeting notes from the RAB meeting on 1/24/25 are attached. Residents expressed concerns about a lack of parking. They also expressed the need for new windows and mailboxes at our senior high rise residential building. The latter are included in the Capital Fund Plan. Parking remains an issue as space is limited and guest parking has been increasing. PHA1 staff will address with stricter parking enforcement.</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><i>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.</i></p>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><i>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.</i></p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? (Section C.4. will be completed following the conclusion of the 45-day public comment period, from 2/14/25 - 3/31/25)</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>



**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing (AFFH).**

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

**Fair Housing Goal:** Assist the City of Covington in the Recruitment of Community Participants for the AFFH evaluation process

Describe fair housing strategies and actions to achieve the goal

TBD in collaboration with the City of Covington and Community Participants

**Fair Housing Goal:** Assist the City of Covington in the documentation and analysis of AFFH issues within the jurisdiction

Describe fair housing strategies and actions to achieve the goal

TBD in collaboration with the City of Covington and Community Participants

**Fair Housing Goal:** Assist the City of Covington with completion of the AFFH Assessment Tool

Describe fair housing strategies and actions to achieve the goal

TBD in collaboration with the City of Covington and Community Participants

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## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

**A. PHA Information.** All PHAs must complete this section. (24 CFR §903.4)

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

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

**B. Plan Elements.** All PHAs must complete this section.

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

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

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

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

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

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

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



**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(i)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(i))

**Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

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

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

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

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

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

**HOPE VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hopec6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hopec6). (Notice PIH 2011-47)

**Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hopec6/mfph4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hopec6/mfph4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(c))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public



housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

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

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR 903.7\(e\)\)](#)

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

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

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

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

**B.3 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\(c\)\(1\)\)](#)

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section [\(24 CFR 903.7\(e\)\)](#). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. [\(24 CFR 903.7\(p\)\)](#)

**C. Other Document and/or Certification Requirements.**

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. [\(24 CFR 903.13\(e\), 24 CFR 903.19\)](#)

**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. [\(24 CFR 903.15\)](#). 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.

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

**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.

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

Public reporting burden for this information collection is estimated to average 7.52 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.

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