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.



# Lucas Metropolitan Housing 5-Year Plan

A.	PHA Information
В.	Plan Elements (required for all PHAs completing this form)
B.1	Mission
B.2	Goals & Objectives
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C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification.
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C.3	Certification by State or Local Officials.
C.4	Required Submission for HUD FO Review
D.	Affirmatively Furthering Fair Housing (AFFH)
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.)



A.	PHA Information.					
	PHA Name: LUCAS MI	ETROPOLITAI	N HOUSING AUTHORIT	Y PHA Cod	le: <u>OH-OO6</u>	_
	PHA Plan for Fiscal Year Beginning: (MM/YYYY):					
	A PHA must identify the sp and proposed PHA Plan are reasonably obtain additiona submissions. At a minimur	ecific location(s) available for insp l information on the n, PHAs must post re strongly encour	where the proposed PHA Plan, lection by the public. Additionate PHA policies contained in the PHA Plans, including updates, raged to post complete PHA Plans.	As must have the elements listed be PHA Plan Elements, and all inform lly, the PHA must provide informa e standard Annual Plan, but exclud at each Asset Management Projects on their official websites. PHAs	ation relevant to the tion on how the pured from their stream t (AMP) and main	e public hearing blic may mlined office or central
	LMHA has the elements listed below readily available to the public.  LMHA has identified specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all relevant information is available for public inspection.  This information is:  Located at each Asset Management Project (AMP).  Located at LMHA's main office/headquarters.  Posted on the LMHA official website.  Provided to each resident council member.				nts, and all	
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in I PH	Each Program HCV
			Constitution	COMMON UM		nev



**B.** Plan Elements. Required for all PHAs completing this form.

**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.

**Vision:** To be a lead partner in creating communities of choice where everyone has a place to call home.

**Mission:** To lead in the development and sustainability of housing accessible to all and providing pathways to an enhanced quality of life to empower vibrant communities. The mission has not been revised.

**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.

The following Goals and Objectives have been revised to align with LMH's vision, mission statement, current, and future initiatives as stated within its annual and strategic plans:

Primary objectives of this plan encompass several critical areas:

<u>Goal 1:</u> Lead in the Effort to Create Accessible Housing Opportunities in Toledo and the Region emphasizing LMH's vital role in addressing the affordable housing crisis.

## Objectives & Strategies:

- LMH launched a Portfolio Repositioning Strategy to create housing opportunities in favorable neighborhoods and to improve existing housing conditions to create mixed-income communities of choice.
  - Development initiatives and Conversion to RAD (Rental Assistance Demonstration)
- There are five projects in the development pipeline for 2024-2026 (see Table 1.0 below).
- 1) Development initiatives and Conversion to RAD (Rental Assistance Demonstration see Table 1.0 below).

Development Project	Units/Apts./ T. Homes	Building Type	TDC	Delivery Date
Palmer	75	Mixed income &	\$15 million	2025
Gardens		Seniors		
TenEyck Towers	154	Elderly/Disabled	\$15 million	2025
CWGIV	40	Mixed	\$20 million	2025
		Income/Families		
The Park Hotel	45	Transition-age	\$14 million	2025
		youth (TAY)		
CWG V	75	Elderly	\$28 million	2026
Mission Point	65	Homeless	TBD	2027



Further, the Choice Neighborhoods redevelopment for Junction McClinton Nunn Homes is a significant redevelopment effort aimed at improving the living conditions and expanding the support services available to residents. LMH is dedicated to fostering positive transformation and elevating the well-being of the communities they serve through ambitious and dynamic development projects.

- Increasing Affordable Housing Units
- See table 1.0 above (all categories)
- New and existing landlord outreach initiatives (HCV)
- Increased payment standards (HCV 120% FMR)
- Expanding PBV housing in communities of opportunity within LMH's jurisdiction:
- Reserving 250 units selected for assistance through a Request for Proposals (RFP) process.
- An additional 10% of PBV's will potentially be utilized under HOTMA's exception provision.
- Preservation and Rehabilitation of Existing Housing Units
- See table 1.0 above (TenEyck Towers RAD conversion)
- Utilize capital funding for PH infrastructure renovation and upgraded security projects.
- Exploring alternative funding and partnership opportunities with local financial institutions and neighborhood advocacy groups through Community Reinvestment Act (CRA) initiatives that promote "choice neighborhood" renovation/rehabilitation community efforts.

<u>Goal 2:</u> Increase Revenue and Pursue Diverse Income Streams signifying LMHA's strategic commitment to financial sustainability and independence from federal funding for objectives of creating unrestricted revenue streams.

## Objectives & Strategies:

- Creation of Financial Opportunity Centers to provide employment and career counseling, one-on-one financial coaching, education, and low-cost financial products that help residents build credit, savings, and assets.
- Using indicators of the Public Housing Assessment System (PHAS) to maintain and exceed a 98% occupancy rate.
- Public-Private Partnerships: Foster strategic partnerships with private sector organizations, leveraging their resources and expertise to generate additional income for LMH initiatives.
- LMH will explore alternative funding, grants, and partnership opportunities with local financial institutions and neighborhood advocacy groups through Community Reinvestment Act (CRA) initiatives that promote neighborhood renovation/rehabilitation efforts aimed at providing choice communities.
- Enhancing and diversifying Section 3 initiatives aimed at increasing resident income
- Exploring the Potential of Fee-for-Service Programs:
- Develop fee-based services or programs that align with LMH's mission and expertise, creating new income streams while providing value to the community.



<u>Goal 3:</u> Building Pathways to Family Income Wealth Building and Economic Advancement underscores LMH's commitment to not only providing affordable housing but also facilitating the empowerment of its residents.

## Objectives & Strategies:

- Economic Advancement
  - Enhance existing and create new programs and initiatives for residents to build wealth and increase economic opportunities.
    - LMH's Resident Services (RS) plays a crucial role in enhancing the lives of residents living in both Public Housing and HCV communities.
    - RS focuses on providing residents with access to a range of supportive services aimed at fostering personal growth, learning opportunities, and economic advancement.
- Housing Continuum Expansion:
  - Diversify housing options, including affordable rental units, transitional housing, and senior housing, to meet the varied needs of residents at different stages of their lives.
- Affordable Homeownership Initiatives:
  - Enhance existing and create new programs and initiatives that assist residents in transitioning from renting to homeownership, including down payment assistance and homebuyer education.
- Employ a Data-Driven Approach:
  - Continuously assess the impact of empowerment programs and housing options through data analysis and resident feedback, adjusting strategies as needed for maximum effectiveness.

<u>Goal 4:</u> Invest in Employee Growth and Enhance Workplace Satisfaction embodies LMH's commitment to excellence, laying a solid foundation for the organization's continued success and positive community impact.

## Objectives & Strategies:

- Empower LMHA staff to reach their full potential to drive improved program delivery and customer service.
- Employee investment to fortify its workforce to create a dynamic, empowered team capable of achieving extraordinary results and making a lasting impact on the community it serves.
  - Training and Development: Develop a comprehensive training and development program that addresses the specific needs and career aspirations of LMH employees.
  - o Communication and Feedback: Establish regular channels for open communication and feedback between employees and leadership.
  - Recognition and Rewards: Implement a meaningful recognition and rewards system that acknowledges and celebrates the achievements of LMH employees.
  - o Diversity and Inclusion: Continue to champion diversity and inclusion within LMH.
  - Competitive Compensation: Ensure that compensation and benefits packages remain competitive within the industry and region to help attract and retain top talent.

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 Work-Life Balance: Recognize the importance of work-life balance and offer flexible work arrangements where possible.

# <u>Goal 5:</u> Launch an Inclusive Communication Strategy to Educate Stakeholders and Foster Community Awareness

## Objectives & Strategies:

- Highlighting LMH's dedication to ensuring that all stakeholders have access to essential information and resources, fostering a well-informed and engaged community.
- Using communication and relevant, transparent information to build trust, promote understanding, and encourage collaboration amongst LMHA's residents, partners, employees, and the broader community.
  - Organize community events, town hall meetings, educational training, workshops, and outreach initiatives to facilitate direct interaction and collaboration between LMH representatives and stakeholders.
  - Develop a well-defined communication plan that outlines strategies, channels, and timelines for reaching various stakeholders, including residents, partners, employees, and the community.

## Goal 6: Streamline Processes and Elevate User Experience and Satisfaction

This goal signifies LMHA's dedication to providing a seamless and satisfactory experience for all its stakeholders, including residents, partners, and employees.

## Objectives & Strategies:

- By streamlining processes, LMH aims to eliminate unnecessary complexities, reduce bureaucracy, and enhance operational efficiency.
  - This translates into organizational benefits and improved services for residents and partners.
  - o It also ensures that individuals seeking housing assistance can access the support they need without unnecessary delays or obstacles.
- Training and Development:
  - Provide ongoing training and professional development opportunities for employees to enhance their technical and programmatic skills, knowledge, and ability to deliver high-quality services.
- Feedback Mechanisms:
  - Establish feedback mechanisms for residents and partners to provide input on their experiences with LMH services.
    - Enables continuous improvement.
- Process Optimization:
  - o Identify and streamline key operational processes within LMHA.
    - Eliminates bottlenecks, reduces paperwork, and enhances efficiency to improve overall service delivery.
- Accessibility and Inclusivity:
  - Ensure that all LMH processes and services are accessible and inclusive, accommodating individuals with diverse needs and backgrounds.
- **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.

Previous 5 Year Plan goals and objective progress report.



# <u>Goal 1:</u> Improve the Quality of Life for Our Residents and Participants Through Services and Programs.

## **Progress Efforts:**

- Established partnerships with many community partners, including the Islamic Food Bank
- Increased Wi-Fi access in LMHA residences
- Staged a College Day through our Family Self-Sufficiency Program

LMHA focused on providing residents with access to a range of supportive services aimed at fostering personal growth, learning opportunities, and economic advancement. These programs were primarily funded through grants, with additional support provided by program partners and LMHA's unrestricted funds. However, the demand for supportive services consistently exceeds the available resources, posing challenges to sustain comprehensive programing agency-wide.

Goal Measured Score = 70%

## Goal 2: Ensure Safe and Secure Environments for Our Staff and Residents

## **Progress Efforts:**

- Increased staffing
- Upgraded camera systems at properties.
- Performed security checks of residents.

LMHA worked with residents to foster safe and secure environments by improving staff and office security, optimizing property design to improve safety and security, continuing HUD health and safety regulations, securing confidential information, and utilizing statistical process control (SPC) techniques to focus on crime prevention.

Goal Measured Score = 85%

## Goal 3: Create a Culture of Excellence in the Workplace

## **Progress Efforts:**

- Hosted IT Lunch & Learns to further staff technology development.
- Provided ongoing training and professional development opportunities.
- Established an Employee of the Month recognition program.
- Staged an annual end-of-year celebration event.

LMHA offered organizational and professional development opportunities to staff; improved internal communications; established ways to effectively communicate organizational performance; and built upon existing efforts to enhance staff camaraderie and pride.

Goal Measured Score = 87.5%



## **Goal 4:** Improve the Financial Condition of Agency

## Progress Efforts:

LMHA Practiced reliable financial reporting and operations in a compliant manner. LMHA trained the Finance Department employees to ensure transparency and accountability while focusing on:

- 1) Improving internal controls
- 2) Developing alternative revenue sources
- 3) Reducing operational expenses.
  - Utilized technology for monthly financial report-outs.
  - Implemented online bill payments.
  - Maintained and reported Key Performance Indicators (KPI's)
  - Established a direct deposit system.
  - Increased housing choice vouchers and utilization
    - o Created an electronic landlord portal.
  - Improved the scope of work in the RFP process.

Goal Measured Score = 96%

## Goal 5: Improve the Housing Portfolio and Housing Opportunities

## **Progress Efforts:**

- Leveraged property to promote racial and economic opportunity and equality.
  - o Established general awareness of high opportunity areas.
- Increased and improve the landlord pool for housing choice vouchers.
  - Created an electronic landlord portal.
- Investigated expansion of affordable housing through the Rental Assistance Demonstration (RAD) program.
  - o Identified potential RAD opportunities.
- Consolidated LMH offices into a single headquarters
- Fostered partnerships.
  - Leveraged vouchers and nonprofit partnerships.
- Applied for a HUD Choice Neighborhood Planning and Implementation Grant to guide transformation of a chosen neighborhood.
- Strengthened partnerships with local governments to achieve improved and sustainable outcomes.
- Increased access to housing for the homeless population
- Enhanced infrastructure safety through preventive maintenance
  - Performed preventive maintenance and replacement on HVAC and mechanical systems.

Goal Measured Score = 86%



## **Goal 6:** Optimize Agency Programs and Operations

## **Progress Efforts:**

LMHA focused on\_Maintaining status as a HUD High Performing Agency; attaining Moving to Work status to provide additional operational flexibility; establishing continuous improvement in processes and programs across operations; developing business continuity plans to improve resiliency of services; implementing an IT Strategic Action Blueprint to ensure staff have appropriate technology to perform their duties effectively; and maintaining effective communications and interactions within the organization.

- Created new staff compliance positions.
- Implementing Lean Six Sigma and Kaizen initiatives
  - o Ongoing
- Developed a business continuity plan during COVID-19
  - Rotating work from home schedules enacted during the pandemic to sustain customer service.
- Continue to evaluate and improve software and technology.
- Provided staff with additional professional training.
  - o Annual Diversity, Equity, and Inclusion training
  - o Annual Fair Housing training
  - o Annual Reasonable Accommodation Training

Goal Measured Score = 80%

**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.

## VAWA Goals are not revised.

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women but are equally available to all individuals regardless of sex, gender identity, or sexual orientation. The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that Lucas Metropolitan Housing Authority (LMHA) complies with VAWA. LMHA provides to tenants, participants, and applicants a Notice of Occupancy Rights under the Violence Against Women Act that explains tenant/participant rights under VAWA. A HUDapproved certification form (HUD-5382) is attached to this notice.

Tenants, participants, and applicants can fill out this form to show that they are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. LMH ensures supporting victim's rights as protected under VAWA.

Previous updates to LMHA's ACOP, Lease, and Administrative Plan will ensure the following:

- LMHA will not knowingly deny assistance to otherwise eligible applicants simply because they have been victims of domestic violence, dating violence, sexual assault or stalking.
- LMHA will not knowingly terminate the assistance of otherwise compliant persons simply because they are victims of domestic violence, dating violence, sexual assault or stalking.
- LMHA will educate applicants and participants about their rights under VAWA.



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- LMHA will work to educate landlords about VAWA and the rights of victims under the act and to work with the landlord and the victims to protect the housing assistance of victims and their families.
- LMHA has adopted an Emergency Transfer Plan that allows for tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to make an internal emergency transfer request under VAWA when a safe unit is immediately available.
- Resident Services assists victims of domestic violence, dating violence, sexual assault, or stalking by connecting victims to appropriate local community agencies that have a track record of providing the necessary services for victims.

## 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.

## The Significant Amendment/Modification criteria has not been revised.

Modifications to the Annual or 5 Year Plan are changes that would affect this Agency's mission, goals, objectives, and policies. LMH has categorized these as *Substantial Deviations* and *Significant Amendment/Modifications* in its Annual Plan.

1) A **Significant Amendment/Modification is** defined by LMH as:

Any change to rent or admissions policies or organization of the waiting list; additions of non-emergency\* public housing CFP work items exceeding 25% of the Agency's overall budget (items not included in the current Capital Fund Annual Statement or 5-Year Action Plan); or any change regarding demolition or disposition designation, Capital Fund Finance (CFFP), development, homeownership programs, mixed-finance proposals, or RAD conversion activities.

- 2) A **Substantial Deviation** is defined by LMH as any change to its 5-Year or Annual Plan as follows:
  - The elimination of a goal or objective prior to it being completed; or
  - A significant change to a goal or objective, represented by more than a one year change to the completion date.
  - Additions or deletions of Strategic Goals

(a) Did the public challenge any elements of the Plan?

• Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.

	approval by the Board of Commissioners.
C.2	Resident Advisory Board (RAB) Comments. LMH will Schedule Presentation / Same time as Annual Plan presentation.  (a) Did the RAB(s) have comments to the 5-Year PHA Plan?  Y N  D D  (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.
C.3	Certification by State or Local Officials. LMH will send to Rosalyn Clemens / Director of Housing and CD (attached)  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. LMH will complete after public notice/C-Rab presentation.



	(b) If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
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.
	LMHA is not currently required to submit an AFH. LMH will address and comply with its fair housing obligations. LMH is working with the local jurisdiction on its Analysis of Impediments and Fair Housing Action Plan. LMH will also include civil rights certification HUD-50077 ST-HCV-HP with its 2025 Annual Plan submission.

## Fair Housing Goal: Maintain HUD Program Compliance & Eliminate Fair Housing Barriers

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

LMHA examines audits, and revises requirements to its programs (and proposed programs) to identify any barriers to fair housing choice within that capacity. LMHA maintains compliance with HUD eligibility requirements and Fair Housing Law by providing professional staff development to identify related concerns that may arise within their daily job duties.

Fair Housing Goal: To affirmatively further fair housing goals and objectives as identified in the Assessment of Fair Housing (AFH) in accordance with (24 CFR 5.150 - 5.180)

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

LMHA actively and transparently addresses any fair housing concerns in a reasonable fashion and timeframe with the resources available at its disposal.

LMH works with local jurisdictions, organizations, and community development groups to implement jurisdiction's initiatives that affirmatively further fair housing measures which may require LMHA's involvement.

Fair Housing Goal: To Maintain Program/Process Expedience & Transparency Regarding Fair Housing Concerns

# Describe fair housing strategies and actions to achieve the goal

LMHA will maintain records reflecting such analysis, actions, and efforts relating to Fair Housing.



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## **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, in 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.