



# **HOUSTON HOUSING AUTHORITY FY 2025**

## **PART I: FIVE-YEAR PHA PLAN, ANNUAL PHA PLAN & ATTACHMENTS**

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### **CONTENTS:**

- ❖ Five-Year PHA Plan for Fiscal Years 2025-2029 (HUD Form 50075-5Y)
- ❖ Five-Year PHA Plan Narrative Attachments
- ❖ Annual PHA Plan (HUD Form 50075-ST)
- ❖ Annual PHA Plan Narrative Attachments

<b>5-Year PHA Plan (for All PHAs)</b>	<b>U.S. Department of Housing and Urban Development Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226 Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The **Form HUD-50075-5Y** is to be completed once every 5 PHA fiscal years by all PHAs.

<b>A.</b>	<b>PHA Information.</b>
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<b>A.1</b>	<p><b>PHA Name:</b> <u>Houston Housing Authority</u> <b>PHA Code:</b> <u>TX005</u></p> <p><b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/01/2025</u></p> <p><b>The Five-Year Period of the Plan (i.e. 2019-2023):</b> <u>2025-2029</u></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <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>
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PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below.)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

<b>B.</b>	<b>Plan Elements.</b> Required for <u>all</u> PHAs completing this form.
<b>B.1</b>	<p><b>Mission.</b> 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.</p> <p>See 5-Year Plan Narrative Section B.1</p>
<b>B.2</b>	<p><b>Goals and Objectives.</b> 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.</p> <p>See 5-Year Plan Narrative Section B.2</p>
<b>B.3</b>	<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>See 5-Year Plan Narrative Section B.3</p>
<b>B.4</b>	<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>See 5-Year Plan Narrative Section B.4</p>
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<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>See 5-Year Plan Narrative Section C.1</p>
<b>C.2</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y   N  <input type="checkbox"/> <input 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>
<b>C.3</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.4</b>	<p><b>Required Submission for HUD FO Review.</b></p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y   N  <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

**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.

<b>Fair Housing Goal:</b>
<i><u>Describe fair housing strategies and actions to achieve the goal</u></i>

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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, 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.

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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 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.

**Houston Housing Authority**  
**HUD 50075-5Y Narrative Attachments**

**B.1 Mission**

The mission of the Houston Housing Authority is to improve lives by providing quality, affordable housing options and promoting education and economic self-sufficiency.

**B. 2. Goals and Objectives (5-Year)**

HHA has identified the following strategic goals and objectives for the five-year period from January 2025 through December 2029. HHA expects that the goals and objectives may be refined over this period to reflect emerging challenges and opportunities. As required, HHA will prepare a Progress Report each year that describes the agency’s progress in meeting these goals and objectives as part of the Annual PHA Plan.

<b>Goal</b>	<b>Objectives</b>
Strengthen HHA's internal capacity	<ul style="list-style-type: none"> <li>• Improve performance on PHAS Indicators</li> <li>• Achieve high performer status</li> <li>• Improve compliance with LIHTC and other regulatory requirements</li> <li>• Provide compliance training for PMCs</li> <li>• Provide bond training for staff</li> <li>• Strengthen case management to assist more families in moving towards self-sufficiency</li> <li>• Improve utilization of program funding resources including grants</li> <li>• Improve tracking and controls over vacancies and damages</li> <li>• Strengthen staff leadership and other skills and expand opportunities for growth through expanded internal cross-training and partnership with NMA</li> </ul>
Create a development plan to reposition aging housing stock and increase production of affordable housing for low-income households	<ul style="list-style-type: none"> <li>• Implement SOAR 2034 plan to expand affordable housing and reposition public housing to Section 8 voucher program platform</li> <li>• Apply for Choice Neighborhoods funding to support redevelopment of three legacy public housing properties</li> </ul>

Goal	Objectives
Promote homeownership and self-sufficiency	<ul style="list-style-type: none"> <li>• Expand homeownership opportunities through MTW including homeownership education, downpayment assistance and other initiatives</li> <li>• Expand and enhance economic opportunities for residents including workforce training and upskilling</li> <li>• Establish additional incentives for Family Self Sufficiency program clients</li> <li>• Create new partnerships through Resident Services for mental health, financial literacy, self-sufficiency, housekeeping and other area</li> </ul>
Advance sustainable external relationships and collaboration	<ul style="list-style-type: none"> <li>• Collaborate with HCV landlords to create a landlord advisory group</li> <li>• Expand engagement with and training for HCV landlords and tenants including evaluating mandatory training</li> <li>• Enhance partnerships through Resident Services Department</li> <li>• Strengthen relationships with Houston Police Department and Precinct 6</li> <li>• Improve public safety in HHA communities by focusing on community policing, engaging youth with law enforcement, enhanced summer program for youth and other initiatives</li> </ul>
Create a positive brand image and customer experience	<ul style="list-style-type: none"> <li>• Implement customer service training for PMCs</li> <li>• Implement enhanced compliance training related to HUD and HHA standards for Asset Managers and PMCs</li> <li>• Implement fair housing training and education for HCV program participants and landlords</li> <li>• Continue to enhance website and expand online functionality</li> <li>• Complete regular recertifications on a timely basis</li> <li>• Increase landlord participation in HCV program through education, leasing and other incentives</li> </ul>

### B.3 Progress Report

HUD requires that HHA provide a progress report on the prior 5-Year Plan goals, which were originally submitted in 2020. Since publication of the last 5-Year PHA Plan in 2020, HHA has continued to implement a broad array of initiatives to preserve and expand the affordable housing portfolio; provide rental assistance and services to more than 18,000 households; help connect residents to jobs, job training, health care and other services; and, improve agency operations and customer service delivery. Progress highlights from the FY 2020 5-Year Plan include the following. See also the FY 2025 Annual PHA Plan for more detail:

- Based on a comprehensive analysis and two years of planning, HHA developed the Soar 2034 strategic framework to reposition the Public Housing portfolio and create



new affordable housing in the City of Houston through the creation and expansion of public/private partnerships and the use of private capital.

- As part of ongoing preservation and repositioning efforts utilizing the Rental Assistance Demonstration (RAD) program, HHA completed closings on HRI/Victory, Allen Parkway Village, Historic Oaks at Allen Parkway Village and Sweetwater Point. See Attachment B.2 for details on additional planned RAD conversions.
- HHA secured MTW designation, obtained HUD approval for the first three MTW Supplements and commenced initial enrollment for the tiered rent study, which will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. Implementation of an alternative tiered rent and participation in the national study are components of HHA's participation in the Moving to Work (MTW) program.
- To expand housing choices for voucher holders, HHA increased Housing Choice Voucher program payment standards, utilizing new flexibility provided through MTW designation. HHA also secured a HUD Mobility Grant in FY 2024, which will help to expand housing choice for HCV program participants.
- Building on a two-year community-based planning and visioning process, a comprehensive Transformation Plan for Cuney Homes and the Third Ward neighborhood was prepared and submitted to HUD in March 2023. Subsequently, in FY 2024, HHA submitted an application for Choice Neighborhoods Implementation grant funding for Cuney Homes and was awarded \$50 million by HUD in July 2024.
- Leveraging its related experience at Cuney Homes, HHA applied in FY 2024 for a HUD Choice Neighborhood Planning for Irvinton Village and the Near Northside neighborhood. The application is currently under HUD review.
- HHA opened the public housing wait list for a thirty-day period in early 2023 following an extensive community outreach process resulting in over 39,000 submitted applications.
- HHA enhanced call center operations with new contractor support to reduce wait times and improve overall customer service.
- Through HHA's Family Self-Sufficiency (FSS) and Homeownership programs, facilitated and supported first time homebuyer purchases for 26 FSS participants who graduated with earned escrows totaling \$315,572. Through the Homeownership Program, 24 families became first-time homeowners.
- HHA secured new funding including \$8.56 million from the Capital Fund Program and \$646,932 to support FSS Program services for residents.

## **B.4 Violence Against Women Act (VAWA) Goals**

HHA has adopted an updated policy to implement the requirements of the Violence Against Women Act (“VAWA”) to clarify HHA responsibilities regarding domestic violence, dating violence, sexual assault and stalking. This policy is applicable to all federally-subsidized housing programs administered by HHA and is incorporated into the Housing Choice Voucher Administrative Plan and the Public Housing Admissions and Continued Occupancy Policy by reference. Protections under the policy are available to all victims regardless of sex, gender identity, or sexual orientation and will be applied consistent with all nondiscrimination and fair housing requirements.

The goals and objectives of HHA’s VAWA Policy are as follows:

- a. Maintaining compliance with all applicable legal requirements imposed by VAWA;
- b. Ensuring the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault and stalking;
- c. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault and stalking;
- d. Creating and maintaining collaborative arrangements between HHA, law enforcement authorities, victim service providers and others to promote the safety and well-being of victims of actual or threatened domestic violence, dating violence, sexual assault and stalking; and
- e. Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, sexual assault and stalking affecting individuals assisted by HHA.

## **C.1 Significant Amendment or Modification**

HHA has adopted the following criteria for determining a “substantial deviation” or “significant amendment or modification” to the 5-Year Plan or Annual PHA Plan, which shall include material changes to the following, except where such changes are required by Congressional action or HUD regulations:

- a. HHA plans or policies regarding demolition or disposition;
- b. HHA plans or policies regarding the Capital Fund financing program or mixed finance proposals
- c. Addition of non-emergency work items over \$500,000 that are not included in the current Annual Statement or Five-Year Action Plan);
- d. HHA plans or policies regarding designation of elderly or disabled housing; and/or
- e. HHA plans or policies regarding waiting list organization or to rent or admissions policies.

With respect to the Rental Assistance Demonstration (RAD) program, As part of RAD, HHA is redefining the definition of a substantial deviation from the Annual PHA Plan to exclude the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and,
- Changes to the financing structure for each approved RAD conversion.

<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.

A.	PHA Information.																																
A.1	<p> <b>PHA Name:</b> <u>Houston Housing Authority</u> <span style="float: right;"><b>PHA Code:</b> <u>TX005</u></span>  <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2025</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> _____ <b>Number of Housing Choice Vouchers (HCVs)</b> _____ <b>Total Combined Units/Vouchers</b> _____  <b>PHA Plan Submission Type:</b> <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> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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Lead PHA:																																	

B.	Plan Elements
B.1	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><b>See B.1 narrative</b></p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p><b>See B.1 narrative.</b></p>
B.2	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><b>See B.2 narrative</b></p>
B.3	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><b>See B.3 narrative</b></p>

<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>HHA has prepared an updated 5-Year Action Plan for FY 2025-2029 (HUD Form 50075.2), which is included as an attachment to the Annual PHA Plan and made available for public comment. The updated 5-Year Action Plan has not yet been approved by HUD.</p>
<p><b>B.5</b></p>	<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 type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<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 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><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.3</b></p>	<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>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.4</b></p>	<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?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p><b>C.5</b></p>	<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:**

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

HHA collaborated with the City of Houston on the 2020 Analysis of Impediments to Housing Choice. The AI includes a detailed analysis of housing programs and services including those offered by HHA, identifies impediments to fair housing choice, and incorporates goals and strategies to address these impediments. The AI includes an overall HHA goal to "Expand efforts to ensure equal opportunity in housing", which will be advanced through four broad strategies:

- Reduce language barriers that may hinder access to programs it administers.
- Ensure compliance with ADA requirements when constructing new and renovating existing units.
- Increase housing choice and mobility.
- Continue education of Fair Housing Laws.

**Fair Housing Goal:**

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

The AI includes a second overall HHA goal to "Increase the quantity and quality of housing" through the following strategies:

- HHA will apply for additional rental vouchers.
- Acquisition and new development of affordable housing.
- Seek land in high opportunity areas.
- Pursue recapitalization with tax credits.
- Utilize Capital Fund and other resources to rehab. and improve properties' condition.
- Complete and maximize performance through conversion of HHA's first four public housing developments with CHAPs, under HUD's Rental Assistance Demonstration.

**Fair Housing Goal:**

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

There is a large and growing need for affordable housing among a wide range of groups including families of all sizes, persons with disabilities, seniors and others. To address these needs, in addition to expanding the supply of affordable housing, HHA's long-term strategies focus on critical areas such as compliance with ADA requirements, expanding housing in high opportunity areas, promoting housing choice and mobility and further education on fair housing.

# 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\(l\)](#)). 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\(l\)](#))

**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(q))

**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/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6) . (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/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4)

**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\(c\)\)](#)

**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\(r\)\(1\)](#))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7 \(g\)](#)). 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\(c\)](#), [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.

**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.

# HOUSTON HOUSING AUTHORITY FY 2025 ANNUAL PHA PLAN ATTACHMENT B.1 – REVISION OF PHA PLAN ELEMENTS

## **A. Statement of Housing Needs and Strategies**

There continues to be a very high demand for affordable housing in Houston, which is exacerbated by limited supply and increasing rents. As of June 2024, HHA has 2,270 applicants on the Housing Choice Voucher program waitlist and 12,927 on the Public Housing program waitlist. Previously submitted information on the City of Houston’s need for affordable housing as detailed in the Consolidated Plan has not been revised with this submission. HHA’s strategies to preserve and expand affordable housing in response to community needs are described in the Five Year PHA Plan and this Annual PHA Plan and MTW Supplement.

## **B. Deconcentration and Other Policies that Govern Eligibility, Selection and Admission**

HHA’s deconcentration of poverty policy is incorporated into the Public Housing Admissions and Continued Occupancy Policy (ACOP). The policy, which has not been modified since the previous submission, states:

*Deconcentration: If at any time, one of HHA’s properties has an average tenant income greater than 15 percent higher than the Authority-wide average income, extremely low and very low-income applicants will be targeted for admission until it is within 15 percent of the Authority-wide average income. This requirement neither requires nor permits the transfer of families to achieve deconcentration goals.*

HHA tracks the income mix within each covered development to avoid a concentration of higher or lower income families in a building or development. Pursuant to 24 CFR 983.2, the table below provides average household income information as of June 2023 both agency-wide and for HHA covered developments that are subject to deconcentration of poverty and income-mixing requirements. As shown in the table, average household income for each of the HHA covered developments falls within the Established Income Range of 85-115% of the agency-wide average household income.

**HHA Income Deconcentration Analysis**

<b>Development Name</b>	<b>HHA Average Income</b>	<b>Development Average Income</b>	<b>% of Established Income Range</b>
Cuney	\$ 11,377	\$ 11,372	99.96%
Ewing	\$ 11,377	\$ 11,361	99.87%
Fulton	\$ 11,377	\$ 11,328	99.57%
Heatherbrook	\$ 11,377	\$ 11,301	99.34%
Independence Heights	\$ 11,377	\$ 11,284	99.18%
Irvinton Village	\$ 11,377	\$ 11,360	99.86%

<b>Development Name</b>	<b>HHA Average Income</b>	<b>Development Average Income</b>	<b>% of Established Income Range</b>
Kelly Village	\$ 11,377	\$ 11,354	99.80%
Kennedy Place	\$ 11,377	\$ 11,374	99.98%
Lincoln Park	\$ 11,377	\$ 11,361	99.86%
Long Drive	\$ 11,377	\$ 11,372	99.96%
Oxford Place	\$ 11,377	\$ 11,352	99.78%

HHA periodically updates its Public Housing ACOP and HCV Administrative Plan to reflect changes that reflect evolving HUD requirements and/or agency discretionary policies. As part of the FY 2025 PHA Annual Plan and MTW Supplement process, HHA is proposing modifications, including HOTMA-related and other changes, to both the ACOP and Administrative Plan. Summaries of proposed changes and the revised policy documents are included as an attachment to this Annual Plan.

### **C. Financial Resources**

The table below summarizes HHA’s preliminary, estimated FY 2025 financial resources to further its mission of providing quality affordable housing to eligible households. Actual funding amounts for FY 2025 are unknown as of the time of this Annual PHA Plan submission. Annual operating budgets for FY 2025 will be prepared during the fourth quarter of 2024 for approval by the HHA and affiliate Boards.

**HHA FY 2025 Estimated Financial Resources**

<b>Source</b>	<b>Amount</b>
Housing Choice Voucher Program	\$245,000,000
Mainstream Voucher Program	7,794,000
Mod Rehab Voucher Program	191,000
Emergency Housing Voucher Program	11,382,000
Continuum of Care Program	1,467,000
Section 8 New Construction	2,310,000
Public Housing Operations	21,262,000
Capital Fund Program	18,134,000
Resident Services/Self-Sufficiency	995,000
Jobs Plus Grant	550,000
Central Office	8,725,000
Business Activities	4,550,000
Real Estate Component Units	22,650,000
State/Local	2,635,000
<b>TOTAL</b>	<b>\$347,645,000</b>

As a designated MTW agency, HHA utilizes the financial flexibility permitted pursuant to HUD’s MTW Operations Notice including use of Housing Assistance Payments (HAP) funds for

authorized non-HAP purposes. This includes landlord leasing incentives as described under standard MTW waivers 4a, 4b and 4c in the MTW Supplement, resident economic development/job training programs, and homeownership downpayment assistance.

Note also that the MTW Supplement submitted with this Annual PHA Plan requires submission of additional financial information related to the Public Housing Operating Fund. Due to the timing of this submission, information provided in the MTW Supplement reflects unaudited and preliminary data that is subject to revision over the course of the reporting and audit periods.

#### **D. Rent Determination**

HHA's policies related to rent determination including HUD-approved MTW waivers as applicable are included in the Public Housing ACOP and HCV Administrative Plan. As part of the Annual Plan process and as noted above, HHA has proposed modifications to both the Public Housing ACOP and HCV Administrative Plan. Summaries of proposed changes and the revised policy documents are included as an attachment to this Annual Plan.

HHA has been designated an MTW agency by HUD as part of Cohort 2 of the MTW Expansion initiative. Under Cohort 2, HHA is participating in a national rent reform evaluation that will impact both the public housing and HCV programs. As part of the process for applying for MTW designation, HHA developed a proposed alternative MTW rent policy, conducted an extensive resident/community engagement process to review the policy and secured HHA Board of Commissioners approval.

Initial enrollment (and random assignment of eligible households) in the MTW rent reform evaluation study commenced in the second quarter of FY 2023 and was completed in FY 2024. As part of the implementation planning process, HHA has worked with HUD and its national evaluation team to review and finalize all applicable policies and processes related to MTW rent reform including, but not limited to, those related to selecting "control" and "treatment" groups for the evaluation.

#### **E. Substantial Deviation, Significant Amendment or Modification**

HHA has adopted the following criteria for determining a "substantial deviation" or "significant amendment or modification" to the 5-Year Plan or Annual PHA Plan, which shall include material changes to the following, except where such changes are required by Congressional action or HUD regulations:

- a. HHA plans or policies regarding demolition or disposition;
- b. HHA plans or policies regarding the Capital Fund financing program or mixed finance proposals
- c. Addition of non-emergency work items over \$500,000 that are not included in the current Annual Statement or Five-Year Action Plan);
- d. HHA plans or policies regarding designation of elderly or disabled housing; and/or
- e. HHA plans or policies regarding waiting list organization or to rent or admissions policies.

With respect to the Rental Assistance Demonstration (RAD) program, As part of RAD, HHA is redefining the definition of a substantial deviation from the Annual PHA Plan to exclude the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and,
- Changes to the financing structure for each approved RAD conversion.

## HOUSTON HOUSING AUTHORITY FY 2025 ANNUAL PHA PLAN ATTACHMENT B.2 – NEW ACTIVITIES

*Soar 2034* is the strategic framework through which HHA will reposition the Public Housing portfolio and create new affordable housing in the City of Houston through the creation and expansion of public/private partnerships utilizing private capital. *Soar 2034* is the culmination of over two years of planning in which Public Housing properties have been thoroughly assessed by third party professionals including architects, engineers, appraisers and environmental consultants.

Houston's Public Housing portfolio has capital needs of over \$300 Million. Conversion tools provided by HUD will enable HHA to access private capital through public/private partnerships to reposition the public housing portfolio. HUD's Rental Assistance Demonstration (RAD) Program removes properties from the Public Housing Program and transitions them to the Section 8 platform to assure continued affordability for residents. HHA will utilize RAD along with other HUD conversion tools to reposition all public housing communities as further described below.

### A. Choice Neighborhoods

Funding through HUD's Choice Neighborhoods program provides an opportunity to develop and implement comprehensive revitalization plans that address the needs of older HHA public housing developments, the neighborhoods in and around these developments, and the residents that live in public housing and the neighborhood. Choice Neighborhoods is a highly competitive grant program through which HUD provides Planning and Implementation grant funding in support of the Choice Neighborhoods program goals related to Housing, Neighborhood and People.

HHA currently has two pending Choice Neighborhood applications as noted below. During the upcoming agency plan year, subject to HUD's award of the requested grants, HHA intends to commence a Choice Neighborhood Planning Grant and kick off a Choice Neighborhood Implementation Grant.

- **Cuney Homes** – HHA submitted a Choice Neighborhood Implementation (CNI) grant application for Third Ward/Cuney Homes and is a finalist for the award of a 2024 CNI grant. If awarded, HHA will proceed with implementation of the Choice Neighborhood Implementation Grant starting in 2024 and continuing through 2032. HHA is partnered with the City of Houston for the CNI grant and together, they have engaged Integral/Rule as the Housing Lead and Urban Strategies as the People Lead.
- **Irvinton Village** – HHA submitted a Choice Neighborhood Planning Grant application for the Near Northside/Irvinton Village. If awarded, HHA will commence a comprehensive planning process for the redevelopment of Irvinton Village in partnership with the Near Northside Super Neighborhood. With the support of the City of Houston, HHA has partnered with LISC and Avenue CDC on the planning grant.



## **B. Mixed Finance/Modernization or Development**

In FY 2025, HHA will continue an ambitious development and preservation initiative to revitalize and/or preserve affordability of the existing housing portfolio and to expand the availability of affordable housing units throughout the City. HHA will continue to collaborate with and may designate additional, qualified development partners and sites selected in accordance with HHA Board-approved procedures. In these efforts, HHA utilizes all available and appropriate funding/financing tools and strategies including Low Income Housing Tax Credits (LIHTC), Mixed Finance Development, Rental Assistance Demonstration (RAD) conversions, HUD Section 18 Dispositions, Project Based Vouchers (PBV), MTW funding, Community Development Block Grant, FEMA and other sources.

HHA may utilize MTW funding and/or programmatic flexibility in its affordable housing preservation and development projects listed below, and may also acquire, rehabilitate or develop “Local, Non-Traditional” units as defined in the MTW Operations Notice, subject to applicable HUD approvals.

HHA will continue to evaluate and pursue where feasible the acquisition or development of public housing units (potentially utilizing “Faircloth to RAD” authority as discussed below in the “Rental Assistance Demonstration Program” narrative) as part of the overall development initiative. All development activities require review and approval by the HHA Board of Commissioners and are subject to HUD and/or other regulatory review and approval.

HHA may commit public housing operating reserves, including but not limited to the proceeds from the disposition of public housing properties, with HUD approval, under the Operating Fund Financing Program for eligible mixed finance development transactions or Replacement Housing Fund.

For informational purposes, HHA will continue to exercise its right to acquire ownership interests from its LIHTC limited partners to support long-term preservation and/or recapitalization of the site.

## **C. Demolition/Disposition**

Section 18 refers to the regulations and process through which HUD authorizes Housing Authorities to dispose of and/or demolish public housing units. Disposition and/or demolition is oftentimes part of an overall strategy to redevelop or replace public housing units. HHA intends to submit a Section 18 demolition application for the properties listed below during the upcoming plan year. HHA intends to redevelop the sites of these properties post-demolition.

- **Kelly Village** – A previous demo/dispo application was submitted for the sale of a portion of the site at Fair Market Value to the Texas Department of Transportation. HHA intends to submit a subsequent demolition application for obsolescence to demolish the remainder of the site. HHA will solicit a development partner to redevelop the site to include Project Based Vouchers to assure long-term affordability.
- **Ewing** – HHA intends to submit a demo/dispo application for obsolescence for this site during the plan year. HHA will solicit a development partner to redevelop the site to include Project Based Vouchers to retain long-term affordability.

- **Irvinton Village** – If HHA does not receive the CNI Planning Grant for the Near Northside/Irvinton Village neighborhood, HHA will submit a demolition application for obsolescence to demolish the property and pursue redevelopment of the site. A development partner will be solicited and redevelopment will include Project Based Vouchers to maintain affordability at the site.

**D. Designated Housing for Elderly and Disabled Families**

The table below identifies public housing developments, or portions thereof, that HHA has continually operated as, has designated, or will apply for designation or renewal of designation in FY 2025 for occupancy by elderly and/or disabled families only. HHA intends to renew these designations subject to HUD approval.

<b>Development Name</b>	<b>Designation Type</b>	<b>Approval Date</b>	<b># Designated Units</b>	<b>Expiration Date</b>
Lyerly Senior Apartments	Elderly/Disabled	2/8/2022	199	2/8/2024
Bellerive Senior Apartments	Elderly/Disabled	2/8/2022	210	2/8/2024

**E. Rental Assistance Demonstration Program**

In FY 2025, HHA will continue and expand initiatives to ensure the long-term preservation of affordable housing by converting public housing developments to project-based assistance pursuant to HUD’s Rental Assistance Demonstration (RAD) program. Through RAD conversions, HHA can access additional private and/or other capital resources if needed to revitalize, redevelop and/or address capital needs while ensuring that existing residents right to return to the converted projects and other resident rights are protected.

In addition to converting existing public housing to project-based assistance, HHA may expand affordable housing opportunities as feasible utilizing the “Faircloth to RAD” program established by HUD. “Faircloth authority” refers to a cap that Congress established in 1998 on the number of public housing units that the federal government would support. HHA currently has available Faircloth units for which HUD can provide rental assistance provided that HHA can finance the acquisition or initial construction costs.

In converting public housing developments, HHA may utilize a blend of RAD program authority and Section 18 disposition authority to the extent allowable under the HUD RAD Notice, HUD PIH Notice 2018-04 and/or successor notices or other relevant HUD regulations and guidance. HHA may also utilize MTW funding and/or programmatic flexibility as allowed under the RAD Notice and/or the MTW Operations Notice.

To date, HHA has successfully converted the following public housing sites to PBV under the RAD program: HRI/Victory, Allen Parkway Village, Historic Oaks at Allen Parkway Village and Sweetwater Point Apartments.

HHA intends to submit applications under the RAD Program for the properties listed below. It is

anticipated that all properties will be processed under the RAD/Section 18 blend provisions.

- **Bellrive** – This property is a traditional public housing community. RAD conversion plans include demolition and redevelopment of the existing site replacing units with RAD and Section 18 Project Based Vouchers (PBV).
- **Lyerly** - This property is a traditional public housing community. RAD conversion plans include demolition and redevelopment of the existing site replacing units with RAD and Section 18 PBVs,
- **Kennedy** – This property is a traditional public housing community. RAD conversion for this property is expected to consist of substantial rehabilitation utilizing FHA mortgage proceeds and converting units to RAD and Section 18 PBVs.
- **Lincoln Park** – This property is a mixed finance community. Redevelopment plans include substantial rehab and conversion of the public housing units to RAD and Section 18 PBVs.
- **Fulton Village** – This property is a mixed finance community. Redevelopment plans include substantial rehab and conversion of the public housing units to RAD and Section 18 PBVs.
- **Oxford Place** - This property is a mixed finance community. Redevelopment plans include substantial rehab and conversion of the public housing units to RAD and Section 18 PBVs.
- **Heatherbrook** - This property is a mixed finance community and is currently undergoing renovations and conversion will be a straight RAD conversion with no additional rehab work.

#### ***Other Development Activities***

- **Sweetwater** – This property was previously converted under RAD. HHA will submit a post-closing request to refinance this project in the upcoming plan year.
- **Victory/HRI** – This property was previously converted under RAD. HHA will submit a post-closing request to add additional PBVs to improve financial performance of the property.

Subject to HHA Board approval, HHA may also apply for RAD conversions during FY 2025 or future periods for additional developments. HHA will follow all required resident notification, public participation and other applicable requirements as part of future conversions. See also Section H. below for additional required RAD provisions.

#### **F. Project-Based Vouchers**

HHA operates a Project-Based Voucher (PBV) program in accordance with HUD regulations and HHA policies as defined in the HCV Administrative Plan. HHA intends to implement allowable PBV waivers as approved by HUD in the FY 2022 and future MTW Supplements to improve program efficiency, streamline administration and support expansion of affordable housing opportunities. In previous MTW Supplements, HUD approved HHA’s request for a waiver to eliminate the requirements for a third party to conduct inspections and rent reasonableness determinations on HHA-owned or controlled PBV units.

As part of planned RAD conversions, HHA projects that it will enter into PBV Housing Assistance Payments (HAP) contracts in FY 2025 or beyond for additional public housing developments as referenced above in the “Rental Assistance Demonstration Program” narrative. In addition to supporting RAD conversions, HHA periodically issues Requests for Proposals (RFP)

or other solicitations for PBV developments. HHA's PBV program focuses on supporting and expanding Permanent Supportive Housing (PSH) and other housing options for low-income families. For this reason, HHA encourages the development of new housing units and/or the rehabilitation of existing housing to increase the supply of affordable accessible housing for this particular population. Current criteria for a development to be awarded PBVs are listed below. HHA may modify this criterion at its discretion when issuing RFPs for PBV developments:

- Have planned and documented a high-quality supportive services program that is results/outcomes oriented and responsive to projected needs of the resident population including both adults and youth.
- For new construction or rehabilitated housing, the project must have a comprehensive and realistic construction and permanent financing budget prepared with construction and permanent funding firmly committed including documentation from all funding sources.
- The project must demonstrate that the applicant has either directly or through its team assembled all the personnel, skills and other resources needed to complete the development project described in the proposal.
- The proposal should demonstrate that the project incorporates good design, especially utilizing “green,” environmentally sustainable building principles.
- The development serves targeted populations such as Chronic Homeless or Veterans Affairs Supportive Housing.
- The development is in a census tract that is in a high opportunity area, or an area designated as a revitalization area by the City of Houston.

In addition to planned RAD conversions and new developments that may be selected through RFPs issued in FY 2025, as of June 2024, HHA plans to enter into new PBV HAP contracts in FY 2025 or thereafter for the following projects. Note that due to variations in development timetables, regulatory approvals and other factors outside of HHA control, projects appearing in this listing may appear in prior or future Annual Plans pending execution of a PBV HAP Contract:

<b>Project Name</b>	<b>Projected PBV Units</b>
Magnificat (NHP/COH)	149
Manson Place (Brinshore)	66
Westernmark	8
800 Middle Street (HHA)	95
Standard at Jensen (HHA)	40
Knowles-Rowland House	31
Boulevard 61	25
Campanile on Minimax	31
<b>TOTAL</b>	<b>445</b>

Subject to approval by the HHA Board of Commissioners, other developments for which HHA may enter into a PBV HAP Contract in FY 2025 or thereafter include:

<b>Project Name</b>	<b>Projected PBV Units</b>
Trinity Senior	90
Independence Heights	131

<b>Project Name</b>	<b>Projected PBV Units</b>
Stephens Court	17
New Hope at Barry	27
New Hope at Gray	67
<b>TOTAL</b>	<b>322</b>

Note that two of the planned PBV developments listed above involve HHA partnerships in the Third Ward in conjunction with the planned Choice Neighborhood Implementation grant program. The following properties will provide replacement housing units for Cuney Homes residents as PBV by Others to support the build first housing strategy:

- **Manson Place** – HHA plans to provide a total of 66 PBVs to this property, of which 40 will serve as replacement housing units for Cuney Homes residents under the CNI implementation plan.
- **Trinity Senior**– HHA plans to provide a total of 90 PBVs to this property, of which 60 will serve as replacement housing units for Cuney Homes residents under the CNI implementation plan.

Consistent with the Administrative Plan, and as allowed under PIH Notice 2017-21, HHA may attach PBVs to projects in which HHA has an ownership interest or has control of, without following a competitive process, in cases where HHA is engaged in an initiative to improve, develop, or replace a public housing property or site.

Projected new PBV HAP contracts may be modified over the course of the fiscal year. In FY 2025, HHA intends to undertake additional PBV competitive solicitations and/or to select additional non-competitive PBVs in accordance with HUD regulations and HHA policy and, subject to HHA Board of Commissioners approval, to award PBV HAP contracts to qualified developments that expand housing opportunities including, but not limited to, permanent supportive housing, housing for transition-age youth, and housing in high opportunity areas.

### **G. Other Capital Grant Programs**

HHA’s existing public housing portfolio requires continuous investment, and there is a backlog of unfunded capital needs. The planned redevelopment and RAD conversion activities referenced above are intended to address some of these needs and to ensure the long-term preservation of affordable housing. In addition to these activities, HHA will review all available HUD Capital Grant program funding opportunities - including, but not limited to, the Lead Based Paint Capital Fund Program, the Housing-related Hazard Capital Fund Program, Emergency Safety and Security Grant - and submit applications where feasible and appropriate in FY 2025.

### **H. Additional RAD Annual Plan Provisions**

As noted above, HHA intends to submit applications to convert various Public Housing communities to the PBV program, pursuant to the RAD guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to PBVs, HHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-23,REV 4 and PIH

2016-17. These residents' rights, participation, waiting list and grievance procedures are excerpted from HUD's Notice and described below. Additionally, HHA certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authorities with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, HHA's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that HHA may also borrow fund to address their capital needs. HHA will also contribute Replacement Housing Factor (RHF) funds and Public Housing Reserve funds in the amount of approximately \$3 million dollars.

***Significant Amendment Definition:***

As part of RAD, HHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and,
- Changes to the financing structure for each approved RAD conversion.

***Units to Be Converted Under RAD:***

Units to be converted under the RAD program are identified above in Section E. The planned RAD conversions will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. Changes in bedroom distribution will be made to accommodate actual needs of all current residents assuring that all households can be rightsized.
3. Most properties will utilize a RAD/Section 18 Blend to maximize potential revenue to reach the necessary rehab level.
4. There will be transfer of assistance under the RAD conversion.

***RAD Resident Rights and Participation***

**1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

**2. Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept HHA’s offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

**3. Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

**4. Phase-in of Tenant Rent Increases.** If a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

*Please Note:* Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

**5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Participants assisted by ROSS-SCs must be RAD-PBV residents. RAD PBV residents must live in a former public housing project that converted under the RAD program and was previously served by a ROSS-SC to be considered as an eligible participant. ROSS-SCs may not serve non-RAD PBV residents.

**6. Resident Participation and Funding.** In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

**7. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

**a. Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- i. A reasonable period of time, but not to exceed 30 days:
  - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
  - In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. 14 days in the case of nonpayment of rent; and



iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

**b. Grievance Process.** HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
  - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
  - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).

iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

**8. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived.

The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

**9. Capital Fund Education and Training Community Facilities (CFCF) Program.** CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

**PBV: Other Miscellaneous Provisions**

**1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

**2. Additional Monitoring Requirement.** The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

**3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

**4. Establishment of Waiting List.** In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list

in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants,

PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the ~~newly-established waiting list~~ are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

**5. Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

**6. Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

**7. Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

**8. Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with

HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

## HOUSTON HOUSING AUTHORITY FY 2025 ANNUAL PHA PLAN ATTACHMENT B.3 – PROGRESS REPORT

The FY 2025 submission includes a new 5-Year Plan and HHA’s goals for the period 2025-2029. HUD also requires that HHA provide a progress report on the prior 5-Year Plan goals, which were originally submitted in 2020. Since publication of the last 5-Year PHA Plan in 2020, HHA has continued to implement a broad array of initiatives to preserve and expand the affordable housing portfolio; provide rental assistance and services to more than 18,000 households; help connect residents to jobs, job training, health care and other services; and, improve agency operations and customer service delivery. Progress highlights from the FY 2020 5-Year Plan include:

- Based on a comprehensive analysis and two years of planning, HHA developed the Soar 2034 strategic framework to reposition the Public Housing portfolio and create new affordable housing in the City of Houston through the creation and expansion of public/private partnerships and the use of private capital.
- As part of ongoing preservation and repositioning efforts utilizing the Rental Assistance Demonstration (RAD) program, HHA completed closings on HRI/Victory, Allen Parkway Village, Historic Oaks at Allen Parkway Village and Sweetwater Point. See Attachment B.2 for details on additional planned RAD conversions.
- HHA secured MTW designation, obtained HUD approval for the first three MTW Supplements and commenced initial enrollment for the tiered rent study, which will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce administrative burdens. Implementation of an alternative tiered rent and participation in the national study are components of HHA’s participation in the Moving to Work (MTW) program.
- To expand housing choices for voucher holders, HHA increased Housing Choice Voucher program payment standards, utilizing new flexibility provided through MTW designation. HHA also secured a HUD Mobility Grant in FY 2024, which will help to expand housing choice for HCV program participants.
- Building on a two-year community-based planning and visioning process, a comprehensive Transformation Plan for Cuney Homes and the Third Ward neighborhood was prepared and submitted to HUD in March 2023. Subsequently, in FY 2024, HHA submitted an application for Choice Neighborhoods Implementation grant funding for Cuney Homes and was awarded \$50 million by HUD in July 2024.
- Leveraging its related experience at Cuney Homes, HHA applied in FY 2024 for a HUD Choice Neighborhood Planning for Irvinton Village and the Near Northside neighborhood. The application is currently under HUD review.
- HHA opened the public housing wait list for a thirty-day period in early 2023 following an

extensive community outreach process resulting in over 39,000 submitted applications.

- HHA enhanced call center operations with new contractor support to reduce wait times and improve overall customer service.
- Through HHA's Family Self-Sufficiency (FSS) and Homeownership programs, facilitated and supported first time homebuyer purchases for 26 FSS participants who graduated with earned escrows totaling \$315,572. Through the Homeownership Program, 24 families became first-time homeowners.
- HHA secured new funding including \$8.56 million from the Capital Fund Program and \$646,932 to support FSS Program services for residents.

In 2020, HHA described its mission and established five (5) broad goals and a series of related strategies as a strategic framework that guides agency activities and resource allocation decisions. The following is a brief statement of HHA's progress to date in meeting the mission and goals described in the prior 5-Year Plan. See also prior years' progress reports for additional details.

**HHA Goal: Increase the quantity and quality of affordable housing.**

*Strategy: Apply for additional rental vouchers.*

HHA continued efforts to maximize utilization of more than 18,000 vouchers utilizing MTW flexibility to modify payment standards and expand the range of housing opportunities available to voucher holders. HHA collaborated with the City and Continuum of Care agencies to lease 750 Emergency Housing Vouchers awarded in FY 2021. HHA entered into an \$11 million contract with the City in FY 2021 to provide one year of rental assistance and security deposits to an additional 1000+ low-income households under the HOME TBRA program. Participating families are eligible for supportive services through partnerships with local providers. HHA received 112 Mainstream Vouchers under the CARES Act and has applied for 100 more. HHA also secured \$4.77 million in CARES Act funding to ensure that there were adequate funds for FY 2021 leasing. HHA will continue to pursue opportunities to increase the availability of tenant-based vouchers for low-income and vulnerable populations. New partnerships will also continue to be sought to offer project-based vouchers to eligible clients.

*Strategy: Acquire and develop new affordable housing.*

Following an extensive HUD review and approval process, HHA completed the acquisition in 2021 of two new land parcels East of Downtown (800 Middle, 100 Jensen). Upon completion of all planned phases, these developments will collectively provide over 1,300 units of new mixed-income housing including over 300 PBV replacement housing units. Both developments are under construction with scheduled completion in December 2024. HHA has also entered into agreements for PBV developments over the course of the plan period that provide long-term affordable housing opportunities, much of which is newly constructed.

*Strategy: Seek land in high opportunity areas.*

As funding becomes available to acquire sites for development in high opportunity areas, HHA will continue to pursue land acquisitions that are appropriate for LIHTC and other mixed-income developments. As noted, the 800 Middle and 100 Jensen mixed-income developments are two

recent examples of successful land acquisition efforts that will result in new affordable housing being built in opportunity areas. In addition, HHA continues to explore options for land acquisition in the Third Ward/Cuney Homes area and in the Fifth Ward/Kelly Village II area.

*Strategy: Pursue recapitalization with tax credits.*

Utilization of LIHTC funds is an important component of HHA's RAD and other preservation efforts. As previously reported, HHA received a 2019 TDHCA allocation of \$19+ Million in 9% tax credits for rehabilitation of 6000 Telephone Road.

*Strategy: Utilize Capital Fund and other resources to rehabilitate and improve property condition.* HHA completed capital improvements at various sites over the five year plan period.

*Strategy: Complete and maximize performance through conversion of HHA's first four public housing developments with CHAPs, under HUD's Rental Assistance Demonstration.*

HHA successfully converted HRI/Victory, Allen Parkway Village, Historic Oaks at Allen Parkway Village, and Sweetwater Point Apartments utilizing the RAD PBV and/or RAD/PBV Section 8 blend methods.

*Strategy: Modernize, rebuild, and/or demolish (if it can be replaced) aging units incrementally through the Capital Fund Program and other sources as available.*

HHA was awarded a Choice Neighborhoods Planning Grant to develop a comprehensive Transformation Plan for Cuney Homes and the Third Ward neighborhood, centered on community input and involvement. The resultant Transformation Plan forms the basis of HHA's application for \$50 million in Choice Neighborhoods Implementation grant funding that was submitted in January 2024 and is currently under HUD review. HHA has also applied for a Choice Neighborhoods Planning grant for the Irvinton Village/Near Northside neighborhood.

*Strategy: Partner with Centerpoint and other energy providers by seeking additional funding grants for energy saving opportunities for properties in HHA's portfolio that qualify under their programs.*

HHA entered into a HUD-sponsored Energy Performance Contract (EPC) with Siemens Industry Incorporated, which has significantly reduced the agency's energy consumption. At the same time, HHA was actively negotiating the lowest electric utility rate possible for its entire portfolio. Because cost savings are a direct result of reduced consumption in an EPC, a reduced utility rate would compromise the dollar savings amount achieved. Since HUD has recognized this fact, it offers PHAs the opportunity to apply for a Rate Reduction Incentive. HHA applied for and received the Rate Reduction Incentive. As a result, in FY 2022 HHA will receive \$766,748 in additional subsidy funding.

HHA previously partnered with Centerpoint Energy and received initial grants to replace 500 outdated HVAC units at various HHA properties with new high efficiency units, along with a \$525K grant to install high-efficiency HVAC units and Nest thermostats at 260 units at Sweetwater Apartments. HHA's affiliate, APV Redevelopment Corporation, submitted an application to Centerpoint Energy for the High Efficiency New Construction (HENC) incentive for 2100 Memorial Apartments. This program provides several incentives for energy efficiency design and construction that results in modeled energy savings improvement from code or other

baselines. Also, the Peninsula Park Apartments applied for and received an Energy Grant Incentive from Centerpoint Energy “Agencies in Action” in the amount of \$588,000, to fund replacement of all 280 existing, inefficient HVAC units and installation of NEST thermostats.

**HHA Goal: Expand efforts to ensure equal opportunity in housing.**

*Strategy: Reduce operational barriers that may hinder access to HHA programs*

The Public Housing waitlist opened from January 15 to February 15, 2023, with a total of 39,546 applications submitted. This opening period proved to be operationally successful from the start. No significant issues or process disruptions were reported. HHA staff assisted hundreds of people with the application process in person at the administrative office in person and by phone/email. Public notice in advance of the opening date was provided through a press release to local and national media outlets, social media posts, and community partnership outreach, and comprehensive information was published on the HHA [Public Housing Waitlist](#) web page.

HHA launched its Call Center transition in January 2023, incorporating a call center contractor to assist in answering the large client call volume the agency receives daily. In the first two days following the launch, representatives answered more than 1,600 calls with an average wait time of fewer than 8 minutes. This additional call center support is expected to improve wait times and overall customer service efficiency significantly.

As reported in prior Annual Plans, HHA undertook extensive efforts over the 2020-2022 period to ensure continued access to programs and services during the pandemic including modifying call center operations to allow residents, HCV participants, applicants and the general public to obtain information, process transactions and access HHA services; working with property managers to implement COVID- safe maintenance work practices; expanding access to staff working remotely; and, expanding the use of virtual meetings (including HHA Board of Commissioners meetings) to keep residents informed and involved in HHA planning and decision-making.

*Strategy: Reduce language barriers that may hinder access to programs it administers*

HHA continued its efforts to reduce language barriers for Limited English Proficiency households including updating its Language Access Plan as part of the FY 2021 Annual Plan process to provide a comprehensive framework to facilitate participation in HHA programs of people with Limited English Proficiency. In response to community needs, HHA continues to deploy an on-demand language translation service that is available as needed to meet the language translation needs of applicants, residents and the general public. HHA also continues to recruit, hire and deploy staff including call center representatives that have the ability to speak, read and translate in various languages. Current staffing in both the call center and lobby includes staff fluent in Spanish and Vietnamese. HHA also updated its website, including adding the capacity to translate text into multiple languages.

*Strategy: Ensure compliance with ADA requirements when constructing new and renovating existing units*

HHA continues to implement an ambitious housing preservation and development agenda including converting public housing developments to project-based assistance under the Rental Assistance Demonstration (RAD) program and the Soar 2034 initiative; developing replacement



housing for Clayton Homes; expanding affordable housing through new development partnerships with Project Based Voucher sponsors and others; and renovating developments that experienced hurricane-related damage. All new developments and substantial renovations are done in conformance with ADA requirements in order to ensure that housing is accessible to persons with disabilities. HHA also continues to provide reasonable accommodations to current residents and HCV program participants.

*Strategy: Increase housing choice and mobility.*

Full implementation of Small Area Fair Market Rents (SAFMR) commenced in 2021 to improve access by voucher holders to high opportunity areas. HHA received HUD approval as part of the FY 2022 MTW Supplement to establish more flexible payment standards (from 80-150% of the applicable SAFMR), which HHA began to implement late in FY 2022. Updated payment standards based on SAFMRs will be implemented effective January 2025. In addition, as previously noted, HHA has created a program to provide flexible landlord leasing incentives to support high opportunity area leasing.

In FY 2024, HHA was awarded a \$5 million HUD Housing Mobility Grant that will provide a wide range of housing search and supportive service assistance to 200 families with children over the five-year grant period.

Working with development partners, HHA also made significant progress towards the development of two (2) new mixed income housing communities to be located East of Downtown in rapidly gentrifying areas. All required HUD approvals have been received for these two projects, which will include development of PBV replacement units for relocated Clayton Homes residents.

*Strategy: Continue education of Fair Housing Laws.*

On an ongoing basis, new hire staff receive training on Section 504, Fair Housing, Reasonable Accommodations, VAWA Requests, and LEP issues by HHA's Compliance Officer. HCV staff also participated in training provided by the Compliance Officer. HHA management staff have also attended seminars in Houston and Washington DC focusing on Fair Housing issues and current events. Additionally, in-house attorneys generally meet quarterly with HCV staff to present legal topics and best practices.

HHA's website provides links to listings of properties that includes identification of accessible units, distance to public transportation, shopping, hospitals and other relevant information. HHA and the City of Houston continue to collaborate on fair housing and other issues associated with the citywide Consolidated Plan and Annual Action Plans.

**HHA Goal: Seek to improve community quality of life and self-sufficiency.**

*Strategy: Provide services to residents, including youth, families, and seniors living in public housing and senior developments to enhance their quality of life.*

HHA collaborates with an extensive network of agency partners to provide services to residents. HHA connects public housing residents to critical programs and services from external and internal partners, with a focus on education and prevention, youth, seniors, and social services. HHA also supports public housing sites' Resident Council Leaders to serve as liaisons between

the HHA and residents to promote lease compliance and housing stability; improve communications by distributing information that provides facts, dispels rumors and identifies ways to access resources to improve the community and families.

As reported in prior Annual Plans, over the course of the pandemic during 2020-2022, HHA and agency partners engaged in extensive activities to protect resident health and safety in response to the global pandemic. This included providing residents with health information, distributing meals, masks and sanitizer, and modifying service delivery systems to minimize contact. The call center made more than 37,000 calls to residents to check on wellness and assist with virtual briefings and appointments. Other recent highlights include:

- HHA expanded the Job Plus Initiative at Oxford Place Apartments to assist public housing residents find and keep jobs. The program combines three components: (1) employment-related services; (2) financial incentives in the form of changes to rent rules to help make work pay, sometimes supplemented with efforts to raise residents' awareness of other available work incentives such as the Earned Income Tax Credit; and (3) community support for work, which consists of meaningful opportunities for residents to promote work among their neighbors, especially by participating in efforts to recruit other residents to Jobs Plus and publicize its services.
- HHA was awarded an Older Adult Home Modification Program grant to improve accessibility and enhance the ability of seniors to age in place.
- Provided Case Management & Supportive Services to children, youth individuals and families residing in Public Housing with funding obtained from HUD to implement ROSS and Multifamily Service Coordinator Grant; over 2,857 residents were served, over 13,526 interactions with clients and over 35,890 services were delivered.
- 26 Family Self Sufficiency (FSS) participants graduated with escrow totaling \$315, 572.
- Collaborated with 50+ Community Partners to provide \$1 million in services to residents.
- Needs assessments and referrals were provided to 484 elderly/disabled and 449 non-elderly residents to support independent living and wellness.
- Through partnerships with YMCA, Zoe's Kitchen, Houston Food Bank and others, more than 116,000 meals and food boxes were distributed to more than 2,600 residents over the course of the pandemic from 2020-2022.
- Continued collaborating with Kidz Grub to provide meals and snacks to youth at 8 sites.

*Strategy: Create well-functioning communities with low crime and good neighbors.*

HHA continued to promote resident involvement and community engagement including providing technical assistance to resident councils to host numerous community-wide and seasonal events in collaboration with more than 25 community partners. HHA continued its collaboration with local law enforcement including the Houston Police Department and Harris County Constables (Precinct 6) to reduce crime within public housing communities.

*Strategy: Provide Family Self-Sufficiency Programs for eligible HCV Program and Public Housing participants pursuant to applicable regulations and available funding.*

FSS continued to function as key elements of HHA's self-sufficiency strategy. HHA assisted 649 non-elderly, non-disabled households in working towards economic self-sufficiency.

*Strategy: Increase Minority & Women Business Enterprises (MWBE) and Section 3 participation.* HHA continued to implement extensive efforts to promote and increase MWBE and Section 3 participation including assisting residents to enroll in the Section 3 program and connect to employment, job training and contracting opportunities and aggressively promoting MWBE engagement in HHA contracting opportunities. In 2023-24, in response to extreme heat emergencies, HHA funded a project to install air conditioning for 4,200 resident households that extensively utilized local businesses.

*Strategy: Pursue systems alignment between housing and health care.* HHA continued to collaborate with community partners to provide extensive support to ensure resident health and safety. HHA has collaborated with several partners including UHC, TSU, HEB Pharmacy, MD Anderson, and other partners to improve the lives of individuals we serve through the facilitation of resources, technical expertise and strategic identification of our clients' medical and housing needs to better align our systems, programs and service delivery, and ultimately improving life outcomes.

HHA in collaboration with M. D. Anderson Cancer Center provides education, resources and referrals to for tobacco cessation support programs to improve compliance with HUD's Smoke Free Policy and to reduce second smoke exposure in African American/Black public housing communities. HHA also collaborated with the organization to provide culturally tailored telephone-directed education and mailed HPV self-sampling kits for improving cervical cancer screening coverage at two public housing communities to eliminate cervical cancer among underserved women.

### **HHA Goal: Improve relationships with clients and external stakeholders.**

*Strategy: Increase HHA client agency relationships.*

HHA collaborates on an ongoing basis with residents and HCV program participants, including providing technical assistance and funding support to local resident councils. HHA also worked diligently to ensure that resident input continued since inception of the pandemic by expanding the use of virtual meetings and conducting broad outreach to notify residents of these meetings. In addition to virtual Board of Commissioners meetings, HHA conducted a series of meetings and an online survey to involve residents and HCV participants in shaping the successful application for MTW designation. During these sessions and in the survey, HHA solicited resident input into the design and implementation of the forthcoming MTW rent reform evaluation program. On an ongoing basis, HHA is committed to engaging residents and other stakeholders in policy planning, development and implementation initiatives to ensure that programs and services reflect meaningful input from the people and communities that HHA serves.

*Strategy: Promote partnerships with other housing authorities.*

It is noteworthy that HHA's CEO is Immediate Past President of the Public Housing Authority Directors Association (PHADA), a national organization representing 1,900 housing authorities nationwide. HHA has continued to actively engage with HUD and housing authority industry groups to advocate for funding and services. HHA continued to work with other local housing authorities to facilitate the portability component of the HCV program, which allows voucher holders to move outside of the voucher-issuing jurisdiction. HHA collaborated with Harris

County to provide HCV inspection and rent reasonableness services for HHA-owned Project Based Voucher developments.

HHA continues to be an active member of NAHRO and continues to engage in activities to broaden our connections with other Housing Authority partners.

*Strategy: Develop strategies to promote positive communications and community perceptions of HHA.*

In addition to the activities noted above, HHA actively engaged in proactive media strategies to positively influence public support for affordable housing, including new development initiatives planned for the East of Downtown neighborhood. HHA's executive management team will continue to prioritize initiatives to communicate consistently and effectively regarding HHA programs, policies and priorities with residents and program participants, regulatory agencies, elected officials and the community at large.

**HHA Goal: Improve agency performance.**

*Strategy: Seek other funding streams.*

Ensuring adequate funding to preserve HHA's existing affordable housing and supportive service programs and to create new affordable housing and expanded services continued to be a top priority for HHA. See "New Activities" narrative for information regarding development and RAD conversion initiatives as well as the discussion of HHA's pending HUD applications for Choice Neighborhood Implementation grant funding at Cuney Homes and for Choice Neighborhoods Planning Grant funding at Irvinton Village. As noted above, HHA has been able to secure additional funding over the course of the 5-Year PHA Plan period to support critical initiatives including:

- \$5 million HUD Housing Mobility grant
- 750 Emergency Housing Vouchers.
- \$11 million contract with the City to expand the HOME TBRA program for 1,000 households.
- 112 new Mainstream Vouchers under the CARES Act
- \$4.77 million in CARES Act funding to ensure that there were adequate funds for FY 2021 leasing.
- \$2.3 million for a new Jobs Plus initiative at Oxford Place Apartments.
- \$717,750 awarded to implement a "Renewal" Resident Opportunity Self Sufficiency (ROSS) Grant during FY 2021 to assist elderly/disabled clients maintain their independence and assist workable adults obtain education, training and job skills to achieve self-sufficiency.
- \$450,000 for a HUD Choice Neighborhoods Planning grant for Cuney Homes.

*Strategy: Improve the physical work environment.*

HHA continued to prioritize the health and safety of the workforce over the past year, including the ongoing implementation of safety measures in a full-time in-person workplace environment.

*Strategy: Invest in human capital.*

HHA's Human Resources Department continued to focus on investments in and training of HHA's

workforce to ensure that they have the tools and skills needed to perform their jobs well. Online training was performed throughout the year on various pertinent topics and skill- building opportunities, and the Employee Assistance Program continued to provide referral resources and confidential support. Monthly wellness newsletters were prepared and distributed with helpful information to promote good health and deal with stress. HR released a climate survey to all staff to receive feedback from employees to help understand where the agency can improve. Cigna nominated the Wellness Committee for the Cigna Wellbeing Award, which is the first time for HHA.

*Strategy: Increase interdepartmental collaboration and communication*

Ongoing interdepartmental collaboration continued throughout the year. The many fruits of this collaboration are reflected in the activities and accomplishments noted in this progress report including development of the Soar 2034 initiative. HHA put in place a new executive management team in 2022 and 2023 that remains focused on improving interdepartmental collaboration in support of the agency’s mission and strategic objectives. Current deliverables include weekly roundtables conversations between staff and the Executive Office, monthly activation around team building, monthly briefing from the CEO, weekly team check ins encouraging silo breakdown, team collaboration, and ongoing learning opportunities. HHA also developed an onsite training center to offer opportunities for staff to learn best practices around assisting residents with HHA programming and deliverables.

*Strategy: Seek new innovations*

HHA continued to pursue innovation in support of the agency’s mission to promote and expand affordable housing and services to low-income households. Examples include the Soar 2034 initiative, HUD Housing Mobility Grant, agency training center, the Transformation Plan for Cuney Homes as well as HHA’s successful effort to secure HUD approval and implement Small Area Fair Market Rents (SAFMRs) citywide. Another key accomplishment was HHA’s designation by HUD as an MTW agency. MTW designation affords HHA a substantial degree of programmatic and financial flexibility that is not available to other non- MTW Housing Authorities. HHA is also participating in a national evaluation of its MTW alternative rent policy and implementing an array of other MTW waivers to help streamline and improve service delivery, enhance voucher leasing and landlord participation, expand housing opportunities and promote resident self-sufficiency.

**HOUSTON HOUSING AUTHORITY FY 2025 ANNUAL PHA PLAN  
ATTACHMENT B.4 – AUDIT**

Houston Housing Authority’s Fiscal Year 2022 audit was completed by independent auditors, Berman Hopkins CPAs & Associates, LLP. The audit report, which was subsequently submitted to HUD, includes a Schedule of Findings and Questioned Costs that identified a number of material weaknesses in internal controls and non-compliance findings. On July 26, 2024, HHA developed and submitted to HUD a Corrective Action Plan that addresses all findings.