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 <u>do not</u> 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 <u>both</u> the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) *Small PHA* A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS 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	PHA Name: Independence Housing Authority PHA Code: MO017
	PHA Type: 🛛 Standard PHA 🔲 Troubled PHA
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2023</u>
	PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
	Number of Public Housing (PH) Units <u>528</u> Number of Housing Choice Vouchers (HCVs) <u>1,656</u> Total Combined
	Units/Vouchers2,184
	PHA Plan Submission Type: Annual Submission

Availability of Information. 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.

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	No. of Units in Each Program	
r ar ucipating r mAs	r IIA Coue	r rogram(s) in the Consortia	(s) In the Consortia Consortia		HCV
Lead PHA:					

B. **Plan Elements**

B.1 Revision of Existing PHA Plan Elements.

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

 \boxtimes

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- \boxtimes Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

Financial Resources.

- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs. $\overline{\boxtimes}$ Safety and Crime Prevention.
- Pet Policy. Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

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

In the upcoming fiscal year, IHA will implement a variety of strategies to address the shortage of affordable housing as reflected in the below waiting list statistics and in the attached Statement of Housing Needs. IHA's strategies emanate from the Agency's 5-Year Plan goals and objectives and are aligned with HUD's strategic framework. They are also consistent with the City of Independences' Consolidated Plan and the State of Missouri Consolidated Plan.

Core strategies include: maximizing affordable housing opportunities through continuous program improvements and management efficiencies; leveraging additional resources to replace public housing units and implement mixed-finance, mixed-income redevelopment; and generating new housing opportunities by applying for additional vouchers should they become available - including special purpose vouchers for targeted groups such as the elderly, disabled, veterans, homeless and foster youth.

IHA will also be reviewing its option to look for funding to merge all of its 0BR units in both developments in AMP001, which includes 159-0BR units at Pleasant Heights, which is an 8-story building along with 2 - 0BR units at Hocker Heights, which is a family site. It is the intention of merging 2-0BR units together for the most part, but some are aligned beside a 1BR unit that will create additional 2BR units for this property. The current layout for Pleasant Heights is 176 - 0BR units; 56 - 1BR units; 9 - 2BR units but once the merging of the units are completed, the unit count will go to the following: 138-1BR units and 19-2BR units for a total unit count of 157 units compared to 243 total units now. This will help the buildings elevator systems not wear down as quickly with the decreased unit count and usage.

The following table provides an overview of the housing needs in Independence and Jackson County that IHA aims to address through implementation of the aforementioned core strategies.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

HUD 2022 COMPREHENSIVE HOUSING USING U.S. CENSUS AMERICAN COMM JACKSON COUNTY, J	UNITY SURVEY	
Total Jackson County Households	286,600	
Owner Households	166,925 (58% of Total)	
Renter Households	119,675 (42% of Total)	
Jackson County Renter Households by Average Median Incom with Breakout of "Low Income Renter" Households	e (AMI)	Statistical Notations
Extremely Low Income renter households (<=30% AMI)	97,700	Of the total 119,680 Renter Households in Jackson County, or 71% are classified as "Low Income" Renter Households
Low Income Renter Households with Moderate to Severe Housing Cost Burden (of total 119,680)	52,515	Of all 119,680 Renter Households, 52,515 "Low Income" Renter Households are Cost Burdened or 44%.
Low Income Renter Households with Housing Problems (of total 119,680)	27,370	Of all 119,680 Renter Households, 27,370 "Low Income" Renter Households are having Housing Problems or 23%.
COST BURDEN: Moderate cost burden is "rent compromising more than 30 percent of incor burden is "rent compromising more than 50% of income	ne". Severe cost	Cost Burden less than or = to 30% : 66,795 Renters Moderate Cost Burden greater than 30% but less than 50% : 25,900 Renters Severe Cost Burden greater than 50% : 23,865 Renters
HOUSING PROBLEMS: A household is said to have a housing problem if it has 1 or more of the 4 pro in the CHAS dataset: 1) housing units lacks complete kitchen facilities; 2) h complete plumbing facilities; 3) household is overcrowded; and 4) household	ousing units lacks	Housing Problems of at least 1 of 4 problems = 52,515 Renters Housing Problems of none of 4 problems = 67,160 Renters

HUD 2022 COMPREHENSIVE HOUSING USING U.S. CENSUS AMERICAN COMM INDEPENDENCE, M	IUNITY SURVEY	
Total Independence Households	48,085	
Owner Households	29,170 (61% of Total)	
Renter Households	18,920 (39% of Total)	
Independence Renter Households by Average Median Incom- with Breakout of "Low Income Renter" Households	e (AMI)	Statistical Notations
Extremely Low Income renter households (<=30% AMI)	50,797	Of the total 18,920 Renter Households in Independence, or 73% are classified as "Low Income" Renter Households
Low Income Renter Households with Moderate to Severe Housing Cost Burden (of total 18,920)	7,710	Of all 18,920 Renter Households, 7,710 "Low Income" Renter Households are Cost Burdened or 42%.
Low Income Renter Households with Housing Problems (of total 18,920)	7,985	Of all 18,920 Renter Households, 7,985 "Low Income" Renter Households are having Housing Problems or 43%.
COST BURDEN: Moderate cost burden is "rent compromising more than 30 percent of inco burden is "rent compromising more than 50% of income	me". Severe cost	Cost Burden less than or = to 30% : 10,440 Renters Moderate Cost Burden greater than 30% but less than 50% : 3,810 Renters Severe Cost Burden greater than 50% : 3,900 Renters
HOUSING PROBLEMS: A household is said to have a housing problem if it has 1 or more of the 4 pr in the CHAS dataset: 1) housing units lacks complete kitchen facilities; 2) h complete plumbing facilities; 3) household is overcrowded; and 4) househol	ousing units lacks	Housing Problems of at least 1 of 4 problems = 8,295 Renters Housing Problems of none of 4 problems = 10,625 Renters

HCV TENANT-BASED ASSISTANCE WAITING LIST

Housing Needs of Families on the Housing Choice Voucher (HCV) Waiting List

Waiting List Type: HCV Tenant-Based Assistance (2022 Waiting List)

	# of Families	% of Total Families
Waiting List Total	2,567	
xtremely Low Income <= 30% AMI	2,194	86%
ery Low Income (>30% but <= 50% MI)	292	12%
ow Income (>50% but <=80% AMI)	56	2%
ver Income	12	0%
amilies With Children	1,350	53%
Iderly Families	122	5%
milies With Disabilities	6	0%
	Characteristics by Bedroom Size	
BR	22	1%
BR	1,328	52%
3R	708	28%
BR	405	16%
BR	82	3%
3R	11	0%
BR	5	0%

PUBLIC HOUSING WAITING LIST

Housing Needs of Families on the Low-Income Public Housing (LIPH) Waiting List

LIPH Waiting List (2022 Waiting List)

	# of Families	% of Total Families
Waiting List Total	453	
Extremely Low Income <= 30% AMI	413	91%
Very Low Income (>30% but <= 50% AMI)	37	8%
Low Income (>50% but <=80% AMI)	3	1%
Over Income	0	0%
Families With Children	246	54%
Elderly Families	14	3%
Families With Disabilities	20	4%
	Characteristics by Bedroom Size	
OBR	2	0%
IBR	268	60%
2BR	126	28%
BBR	51	11%
IBR	6	1%

B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N □ Hope VI or Choice Neighborhoods. □ Mixed Finance Modernization or Development. □ Demolition and/or Disposition. □ Designated Housing for Elderly and/or Disabled Families. □ Conversion of Public Housing to Tenant-Based Assistance. □ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. □ Occupancy by Over-Income Families. □ Occupancy by Police Officers. □ Non-Smoking Policies. □ Project-Based Vouchers. □ Units with Approved Vacancies for Modernization. □ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.
	IHA developed an RFP for a Master Developer and chose BGC Advantage to begin moving forward with IHA's proforma and plans on the redevelopment of IHA's Low Income Public Housing units as well as creating additional Affordable Housing units. Various funding sources such as Choice Neighborhood, LIHTC, Home Loans, CDBG, etc. to assist in renovations of all three Public Housing developments will be applied for in various phases. This will be done utilizing Section 18, RAD, or Voluntary Streamlining to PBV vouchers once our portfolio is under the 250 unit cap for Streamlining.
	IHA and Developers sent in RAD application in June 2022. RAD CHAP approval letters were received on 9/19/2022 and correction letters were received on 9/27/2022 due to incorrect AMP numbers on the CHAP letters.
	Demolition / Disposition will be looked at in the upcoming future on rehabilitation of the units or move toward New Construction in another approved location
	IHA then intends on designating some of its housing developments into Elderly / Disabled Housing.
	IHA will continue to rehab units at one development with CFP funds, even if LIHTC and other GAP mixed-finance funding sources that are not obtained immediately.
	IHA will continue to go after ESSG grants and any other grant that can assist the Housing Authority in moving towards making these properties newer, fresher, and safer.
	IHA has and will continue to review and revise the HCV Admin Plan and LIPH ACOP when needed or if any changes from HUD deems IHA to review and change these policies due to Statutory or Regulatory Changes.
	IHA intends to merge all 0BR units at Pleasant Heights with each other to create larger 1BR units or merge 0BR units with 1BR units to make 2 BR units in both developments of AMP001. This will bring the unit count down from 243 units to around 157 total units for Pleasant Heights in AMP001, which is a better number for the existing 2 elevators that are operational. IHA plans to merge 2 – 0BR units in Hocker Heights, which will bring the total unit count from 140 to 138. The removed merged units from both developments under AMP001 will be rebuilt into new construction that are on a new site along with adding the remainder of IHA's Faircloth Limit of 4 additional units.
	IHA will be applying for CDBG, HOME funds, and any other type of GAP funding to fill in gaps on renovation/new construction projects.

B.3	Progress Report.
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The 2022-2026 5YR CFP Action Plan in EPIC was approved by HUD on 6/22/2022.
В.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	$\begin{array}{c} Y \\ \boxtimes \end{array}$
	(a) If yes, please describe: HCV program received a finding due to inaccurate Utility Allowance calculations on the sheet compared to the 50058. The HCV program specialists had miscalculated the Utility Allowances or just added incorrectly for a total that was not the same as the 50058 showed.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N II IX
	(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.
	Due to continued COVID-19 Pandemic and use of HUD waivers and COVID-19 protocols in 2022, the RAB and Resident Associations have not met in 2022. All activities have been shut down and IHA is utilizing the HUD PIH Notice Waivers for 2020-05, 2020-13, 2020-33 and 2021-14 until December 31, 2021. All three Resident Council had disbanded prior to COVID-19 in 2020. Once the HUD Waivers are over as of December 31, 2022, IHA will contact each property and begin the process of finding new residents that are interested in participating in the Resident Councils.
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.
С.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
	(a) Did the public challenge any elements of the Plan?
	$\begin{array}{cc} Y & N \\ \Box & \boxtimes \end{array}$
	If yes, include Challenged Elements.

Г

٦

C.5	 Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A N N/A
	(b) If yes, please describe:
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
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal

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)(i))

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. 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))

 \boxtimes 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. (<u>24 CFR §903.7(c)</u>)

IHA anticipates a decrease in Rental Income by the tenant due to COVID-19. This is shown to be accurate in the prior year due to losses of jobs and the tenants were getting the extra Unemployment that could not be calculated into the Rent Structure or the Child Tax Credit checks that cannot be calculated into the Rental Structure either. This is keeping the rent amounts lower but subsidy for the LIPH side has not increased any to compensate. IHA is utilizing more of the 1406 Operations from CFP's to help offset some of the losses from the program income.

IHA anticipates about \$100,000 less per year until employment sectors get an increased boost from the economy and the rental structure increases to offset losses. There are many employment opportunities available but the individuals are just not applying.

IHA anticipates around a \$190,000 increase in Operating Subsidy with the LIPH program and a decrease in the amount of \$42,322 from 2020 to 2021 CFP due to loss of High Performer Status due to vacancies brought on by the initial onset of COVID-19.

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(1)). 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(1))

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, 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, 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, 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))

IHA continues to improve security by having all community rooms and hallway lighting has been switched to LED so as there are no dark areas at night for the high-rise buildings. IHA has provided overnight security at one of the High-Rises and updated all camera systems to the cloud so as to gain additional recording times. 2nd High rise has cameras monitored offsite and hallways walked periodically as well as parking lots monitored. IHA will continue to apply for ESSG grants from HUD to add Cameras and Solar Lighting onto the properties to decrease dark areas, especially on the family site of 13.5 acres.

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. (Notice PIH 2011-47)

IHA intends on applying for the Choice Neighborhood Planning Grant for the family site at Hocker Heights in 2021 and future years for other properties if it will work along with RAD conversion.

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

IHA intends on applying for both Federal and State of MO LIHTC to assist with the housing authorities plans on redevelopment and conversion via RAD and voluntary streamlining, once we have our units below 250.

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. (24 CFR §903.7(h))

IHA intends on going after Choice Neighborhood or LIHTC to rebuild the family site at Hocker Heights, which will entail an application for Demolition and Disposition along with a RAD application for conversion to PBV vouchers.

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))

IHA intends on designating some of its redeveloped housing to Elderly / Disabled Only.

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))

IHA intends on converting LIPH units from 528 down to below 250 units in various phases of RAD conversion to PBV vouchers and then the last property will be converted to PBV under the Voluntary Streamlining rule to get additional payment standards.

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: <u>Notice PIH 2012-32 REV-3</u>, successor RAD Implementation Notices, and other RAD notices.

IHA intends on converting LIPH units from 528 down to below 250 units in various phases of RAD conversion to PBV vouchers and then the last property will be converted to PBV under the Voluntary Streamlining rule to get additional payment standards.

□ 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 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; 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))

Cocupancy 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))

IHA will continue to offer a unit at each of our properties to gain added security, especially at the High-Rises or Family property site. If we have a police officer that is willing and requests to move onto the property, then we would request that unit to be removed from occupancy via PIC and under a Special Category and still draw subsidy off the unit.

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

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

 \square 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 <u>24 CFR §990.145(a)(1)</u>.

IHA will continue to request units in PIC to be approve for Modernization Vacancy so that we can continue to get subsidy for this unit while it is under Modernization and being rehabilitated. IHA's intention is to merge 159 plus 0BR units at Pleasant Heights into 1BR and 2BR units, taking the total unit count from 243 to 166 and the remainder of the units that were removed will be constructed on a new construction site.

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

IHA will continue to apply for Emergency Safety and Security Grants to assist with Security Issues on IHA Properties prior to the closing of the RAD projects.

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."

See Capital Fund 2022-2026 5YR Action Plan in EPIC approved by HUD on 06/22/2022.

- **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 of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
 - C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

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

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.