

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: _Housing Opportunities Commission of Montgomery County_ PHA Type: ☐ Small ☐ High Performing ☒ Standard ☐ HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): 07/2014 PHA Code: _MD004_												
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 1,056 Number of HCV units: 7,042												
3.0	Submission Type ☐ 5-Year and Annual Plan ☐ Annual Plan Only ☒ 5-Year Plan Only												
4.0	PHA Consortia ☐ PHA Consortia: (Check box if submitting a joint Plan and complete table below.)												
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program <table border="1"> <tr> <th>PH</th> <th>HCV</th> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table>	PH	HCV						
PH	HCV												
	PHA 1:												
	PHA 2:												
	PHA 3:												
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.												
5.1	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: To provide affordable housing and supportive housing services that enhance the lives of low-and moderate income families and individuals throughout Montgomery County, Maryland.												

<u>Violence Against Women Act (VAWA)</u> To help meet the goals of the Violence Against Women Act (VAWA), HOC provides support and referrals to counseling for victims of domestic violence, sexual assault, or stalking. The County Department of Health and Human Services' Abused Persons Program (240-777-4673) provides 24 hour services, including access to counseling and shelters. HOC has adopted procedural language to ensure that victims retain their housing assistance. HOC also assists victims with referrals to obtain restraining orders.

5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. This Five-Year PHA Plan will cover Fiscal Years (FY) 2014-2018 (HOC FY 2015 – FY 2019). In this section (5.2), please find a description of HOC's goals and objectives over these next five years that will enable the Agency to fulfill its mission as stated above in Section 5.1: 1. Goal: To expand and preserve the supply of assisted housing a. Objective: When available, HOC will apply for additional rental vouchers; reduce public housing vacancies; leverage private or other public funds to create additional housing opportunities; and acquire or build units or developments. 2. Goal: To continue to improve the quality of assisted housing a. Objective: HOC will improve its public housing management, as measured by its PHAS score; improve voucher management, as measured by its SEMAP score; increase customer satisfaction; concentrate on efforts to improve specific management functions; renovate or modernize public housing units; demolish or dispose of obsolete public housing, if appropriate; and ensure that alternatives such as replacement public housing or replacement vouchers are available. 3. Goal: To increase assisted housing choices a. Objective: HOC will conduct outreach efforts to potential voucher landlords and continue its voucher homeownership program. 4. Goal: To provide an improved living environment a. Objective: HOC will actively work to deconcentrate poverty by converting our existing public housing properties into Project-Based Rental Assistance (PBRA) units and Project-Based Voucher (PBV) units using the Rental Assistance Demonstration program (RAD); implement measures to promote income mixing in HOC owned properties by assuring access for lower income families into higher income developments and adding market rate units into properties that were previously exclusive to low-income households; implement security improvements to our existing housing stock; and maintain existing designations of developments for particular resident groups. 5. Goal: To promote self-sufficiency and asset development of assisted households a. Objective: HOC will continue to work to increase the number and percentage of employed persons in assisted families; provide or attract supportive services to improve assistance recipients' employability; provide or attract supportive services to increase independence for the elderly and/or families with disabilities. 6. Goal: To ensure equal opportunity and affirmatively further fair housing for all HOC residents a. Objective: HOC will continue to undertake affirmative measures to ensure access to assisted housing for all qualified applicants regardless of race, color, religion, national origin, sex, familial status, disability, or source of income; undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, disability, or source of income; undertake affirmative measures to ensure accessible housing is available to persons with all varieties of disabilities regardless of unit size required. 7. Goal: To enable HOC to serve the needs of children and adult victims of domestic violence, dating violence, sexual assault, or stalking a. Objective: HOC will continue to follow and, as needed train staff on, procedures to ensure that to the maximum extent feasible victims of domestic violence, dating violence, sexual assault, or stalking will retain their housing assistance, develop and maintain effective relationships with providers of assistance, and support the children and adult victims of these terrible acts. <u>Progress Report on the expiring Five-Year Plan (FY 2009 – FY 2013 [HOC FY 2010 – FY 2014]):</u> HOC has met all of its goals in the expiring Five-Year plan. HOC has developed and is developing affordable, mixed-use developments in Montgomery County, such as Metropointe in Wheaton. HOC has created two customer service centers, one down-County in Silver Spring and the second up-County in Gaithersburg. HOC has used ARRA money to expand its public housing rehabilitation efforts. HOC continues its efforts through newsletters and forums to reach out to landlords for the voucher program. HOC has reviewed and enhanced security and self-sufficiency efforts for its residents. HOC has continued to work with staff and other agencies on its fair housing efforts. Between 2009 and 2013, HOC conducted multiple trainings for both HOC staff and outside parties on fair housing, domestic violence, and other issues. HOC implemented policies and procedures to ensure full compliance with the Violence Against Women Act (VAWA). HOC expanded its allocations of Veterans Affairs Supportive Housing (VASH) and Non Elderly Disabled (NED) vouchers.
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PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

As a result of the RAD conversion project, which will convert all but seven of HOC's existing public housing (PH) units to PBRA and PBV, additional guidance discussing the goals, objectives, and program regulations specific to the converted RAD units have been added to this Five-Year Plan. The seven remaining PH units are located at the Tobytown property and will continue to function according to the PH goals, objectives, and program regulations identified in this Plan. As HOC's RAD conversion project progresses over the next few years, the PHA Plan content in this Five-Year Plan regarding PH will cease to be applicable to the converted units. In place of the PH policies for these converted units will be the RAD conversion policies detailed in this Plan.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

The Public may view the PHA Plan, supporting documentation, and obtain information regarding any of the activities outlined in this plan at HOC's main administrative offices (10400 Detrick Avenue, Kensington, Maryland 20895) and at the following three satellite offices:

HOC Gaithersburg Customer Service Center
101 Lakeforest Blvd.
#200
Gaithersburg, Maryland 20877

HOC Silver Spring Customer Service Center
8241 Georgia Avenue
3rd Floor
Silver Spring, Maryland 20910

HOC East Deer Park Offices
231 East Deer Park Drive
Gaithersburg, Maryland 20877

Additional documents and supporting documents for this PHA Plan, that are also available for viewing at the above locations, are listed below:

- Form HUD-50077: PHA Certifications of Compliance with PHA Plans and Related Regulations (MD004a01.pdf)
- Form HUD-50070: Certification for a Drug-Free Workplace (MD004b01.pdf)
- Form HUD-50071: Certification of Payments to Influence Federal Transactions (MD004c01.pdf)
- Form SF-LLL: Disclosure of Lobbying Activities (MD004d01.pdf)
- Resident Advisory Board (RAB) comments on PHA Plan (MD004f01.pdf)
- Form HUD-50077-CR, Civil Rights Certifications (MD004j01.pdf)
- Form HUD-50077-SL, Certification by State or Local Office of PHA Consistency with the Consolidated Plan (MD004k01.pdf)

The Plan and its supporting documents are also available for review on HOC's web site: www.hocmc.org.

Staff met with the Resident Advisory Board (RAB) on April 21, 2014 to discuss this PHA Plan.

A public hearing regarding this PHA Plan will be held on June 13, 2014 at 10:00 a.m. in the Hearing Room at HOC's main administrative offices (10400 Detrick Avenue, Kensington, Maryland 20895).

6.0

Section 6 Continued:

Description of PHA Plan Elements (24 CFR Part 903.7):

1. Eligibility, Selection and Admissions Policies, including Deconcentration and Waiting List Procedures

(a) HOC's Housing Choice Voucher program (HCV) is governed by HOC's Administrative Plan. The Administrative Plan derives its layout and much of its content from the Code of Federal Regulations, Title 24, Part 982 – Section 8 Tenant-Based Assistance: Housing Choice Voucher Program. Updates to this Administrative Plan have occurred since HOC last submitted a Five-Year PHA Plan. HOC's current HCV regulations regarding eligibility and selection, waiting list procedures, and admissions policies are as follows:

1. Eligibility and Selection Criteria

Eligibility for HOC's HCV program is determined when an applicant is called from the waiting list. HOC uses the following criteria for screening applicants:

- An applicant must be a "family".
- An applicant must be within the appropriate Income Limits.
- An applicant must furnish Social Security Numbers for all family members age six and older.
- An applicant must furnish Declaration of Citizenship or Eligible Immigrant Status and verification where required.
- At least the head of household or spouse of the applicant family must be either a U.S. citizen or have eligible immigration status before the PHA may provide any financial assistance.

- f. Criminal or drug related activity only to the extent required by law or regulation including criminal records from local and state law enforcement agencies. HOC checks national and state sex offender registries and will deny persons subject to lifetime registration. HOC will review, on a case by case basis, the issues related to any applicant who is registered as a sex offender for other than their lifetime.

2. Waiting List Procedures

Presently, HOC operates two HCV waiting lists: one for tenant-based voucher holders, and one for project-based voucher holders.

- a. The waiting list is evaluated yearly to decide whether to purge the list and re-open it, or to keep it closed.
- b. When the waiting list is open, interested persons may apply at HOC's main administrative office, site management offices, or through HOC's website, www.hocmc.org.
- c. The waiting list contains the following information for each applicant listed:
 - i. Applicant name
 - ii. Family unit size (number of bedrooms family qualifies for under PHA subsidy standards)
 - iii. Date of application
 - iv. Qualification for any local preference
 - v. Racial or ethnic designation of the head of household
 - vi. Targeted program qualifications

3. Admissions Policies

- a. HOC includes as a preference for admission the former Federal preference of Involuntary Displacement. This preference would be limited to no more than 30 HCV participants.
 - b. HOC includes a preference for victims of, or witnesses to, crimes. A request for such a preference would come from the State's Attorney's office or similar office.
 - c. HOC includes a preference for applicants who live, work, and/or participate in or have been graduated from training and education courses in the jurisdiction, local displacement and transitional housing preferences, and applicants unable to work due to age or disability.
 - d. HOC includes a preference for medically vulnerable homeless individuals. This preference is limited to 10 HCV participants.
 - e. First priority in admissions preference is by date and time.
 - f. Second priority is given equally to the remaining preferences.
 - g. Among applicants with equal preference status, applicants are selected by drawing (lottery).
 - h. An applicant who has been called up because of a preference but screening indicates that the applicant does not otherwise qualify will be removed from the waiting list.
- HOC's policies for HCV eligibility and admissions are established in Chapter 3 of the HOC Administrative Plan.
 - HOC's HCV waiting list and selection processes are established in Chapter 4 of the HOC Administrative Plan.

(b) HOC's Public Housing (PH) is governed by HOC's Public Housing Admissions and Continued Occupancy Policy (ACOP). Updates to this ACOP have occurred since HOC last submitted a Five-Year PHA Plan. HOC's current PH regulations regarding eligibility and selection, waiting list procedures, admissions policies, and deconcentration measures are as follows:

1. Eligibility and Selection Criteria

Eligibility for HOC's PH program is determined when an applicant is called from the waiting list. HOC uses the following criteria for screening applicants:

- a. Family status
- b. Income eligibility
- c. Citizenship/eligibility status
- d. Social Security Number documentation
- e. Signing consent forms
- f. Criminal or drug related activity only to the extent required by law or regulation including criminal records from local and state law enforcement agencies. HOC checks national and state sex offender registries and will deny persons subject to lifetime registration. HOC will review, on a case by case basis, the issues related to any applicant who is registered as a sex offender for other than their lifetime.

HOC uses rental history for screening all applicants.

HOC uses a credit check for screening all applicants.

2. Waiting List Procedures

Presently, HOC maintains sub-jurisdictional waiting lists for PH. An applicant can apply to up to two sub-jurisdictional lists for which they qualify. The sub-jurisdictional waiting lists cover different areas of Montgomery County and include approximately the same number of PH units in each list.

- a. The waiting list is evaluated frequently to decide whether to purge the list and re-open it, or to keep it closed.
- b. When the waiting list is open, interested persons may apply at HOC's main administrative office, site management offices, or through HOC's website, www.hocmc.org.

3. Assignment

- a. An applicant will be removed from the PH waiting list if the applicant rejects two vacant units without good cause.

4. Admissions Policies

- a. HOC includes as a preference for admission the former Federal preference of Involuntary Displacement. This preference is limited to no more than 10 PH participants.
- b. HOC also has a preference for admission for applicants who live, work, and/or participate in or have been graduated from training and education courses in the jurisdiction, local displacement and transitional housing preferences, and applicants unable to work due to age or disability.
- c. First priority in admissions preference is by date and time.
- d. Second priority is given equally to the remaining preferences.
- e. The following are circumstances in which transfers take precedence over new admissions:
 - i. Emergencies
 - ii. Over housed
 - iii. Under housed
 - iv. Medical justification
 - v. Administrative reasons (e.g., to permit modernization work)
 - vi. Among applicants with equal preference status, applicants are selected by drawing (lottery)
 - vii. An applicant who has been called up because of a preference but screening indicates that the applicant does not otherwise qualify will be removed from the waiting list

5. Deconcentration

It is HOC's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end HOC may skip families on the waiting list to reach other families with a lower or higher income. HOC will accomplish this in a uniform and non-discriminating manner.

- HOC's policies for PH eligibility and admissions are established in Chapter 8 of the HOC ACOP.
- HOC's PH waiting list and selection processes are established in Chapters 9 and 10 of the HOC ACOP.

(c) As identified above, HOC is currently in the process of converting all of its existing PH units, other than seven (7) units, to either PBRA or PBV through HUD's RAD program. Of the 11 PH properties scheduled for conversion, the actual conversions will occur in a staggered format throughout the five years of this Five-Year PHA Plan. HOC has received Commitments to Enter into Housing Assistance Payments Contracts ("CHAP") for ten (10) public housing developments and anticipates receipt of another CHAP for the Holly Hall public housing development. These public housing properties are grouped into multiple Asset Management Projects (the "RAD AMPs"), as follows:

Properties Comprising RAD AMPs
Seneca Ridge (aka Middlebrook Square)
Parkway Woods and Ken Gar
Towne Centre Place and Sandy Spring Meadow
Washington Square and Emory Grove
Arcola Towers
Waverly House
Elizabeth House
Holly Hall

A number of these RAD AMPs will be re-grouped (consolidated and/or divided) into one or more properties under common ownership by an affiliate of HOC and under a common financing scheme (each a "RAD Property" and collectively, the "RAD Properties"). Further, some of the Assistance Transfer Units from some of the RAD AMPs or sites will be consolidated into another RAD Property. The following table illustrates some of these projected re-grouping.

RAD Properties
Seneca Ridge, Parkway Woods, Ken Gar, Towne Centre Place, Sandy Spring Meadow, and Washington Square
Emory Grove (scattered site single-family homes)
Arcola Towers
Waverly House
Elizabeth House
Holly Hall

As HOC's RAD conversion progresses over the next few years, subsequent PH content from this PHA Plan will become inapplicable to all but the seven (7) unconverted public housing units at Tobytown. Importantly, the following eligibility, selection, admissions policies,

deconcentration, and waiting list procedures will apply to the units converting from PH units to either PBRA or PBV units through the RAD program.

1. RAD Eligibility and Selection Criteria Modifications

- I. Occupied Units to be Converted Under RAD. Any tenant residing in a PH unit at any of the RAD properties at the time of conversion, shall be eligible for tenancy in a post-conversion unit. These tenants will be eligible for either PBRA units or PBV units. The PBRA RAD units will be located either (i) on-site, after a rehabilitation of the property (the "On-Site RAD Units"), or (ii) at a new location as new construction replacement units (the "Replacement RAD Units"). The PBV RAD units will be units for which the assistance is transferred to other properties owned by an affiliate of HOC (the "Assistance Transfer Units", referenced jointly with the On-Site RAD units and the Replacement RAD units as the "RAD units"). HOC plans to convert 481 public housing units as On-Site RAD units, convert 256 public housing units to Replacement RAD units (for the Elizabeth House and Holly Hall properties), and transfer assistance for 100 public housing units. In all cases, each of the 837 public housing units converted under RAD will continue to receive a subsidy.

RAD AMP	Current Public Housing Units	On-Site RAD Units	Replacement RAD Units	Assistance Transfer Units
Seneca Ridge (Middlebrook Square)	71	64	-	7
Parkway Woods and Ken Gar	43	39	-	4
Towne Centre Place and Sandy Spring Meadow	104	94	-	10
Washington Square and Emory Grove	104	25	-	79
Arcola Towers	141	141	-	-
Waverly House	158	158	-	-
Elizabeth House	160	-	160	-
Holly Hall	96	-	96	-

- A. On-Site RAD Units and Replacement RAD Units. This list enumerates the rights of those existing residents who occupy a RAD unit at the time of conversion and who either remain on-site at the RAD property after conversion or who relocate to a newly constructed Replacement RAD Unit. Occupants of these RAD units will receive PBRA. All PH units that are converting to PBRA through RAD will use Form HUD 90105-A Model Lease for Subsidized Programs with an initial lease term of one year. Complete information on these matters may be found under the heading of "Special Provisions Affecting Conversions to PBRA" in HUD's PIH Notice 2012-32 (Section 1.7.B & C), which are incorporated herein by reference and summarized below:
- No re-screening of tenants upon conversion.
 - Resident right to return to the property (or, in the case of Elizabeth House and Holly Hall, the newly constructed replacement property) if relocated as a result of conversion, irrespective of income level.
 - Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over three (3) years or five (5) years, as determined by HOC.
 - Continued eligibility for Public Housing-Family Self-Sufficiency ("PH-FSS") and Resident Opportunities and Self-Sufficiency- Service Coordinators ("ROSS-SC") programs; provided, however, that these tenants will be given first priority for Assistance Transfer Units.
 - Resident Participation and Funding: Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding (see Attachment 1B of PIH Notice 2012-032).
 - Termination notification: HOC must provide written notification of termination of lease within a reasonable time:
 - Not to exceed 30 days if health or safety of other tenants, HOC employees, or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction;
 - 14 days for non-payment of rent; and
 - In all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply.
 - Grievance process: See PIH Notice 2012-32 Section 1.7.B.6. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the United States Housing Act of 1937 (the "Act"). The RAD program will require that:
 - Residents be provided with notice of the specific grounds of the proposed owner adverse action, as well as their right to an informal hearing with HOC (as owner);
 - Residents will have an opportunity for an informal hearing with an impartial member of HOC's staff (as owner) within a reasonable period of time;
 - Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the owner as the basis for the adverse action. With reasonable notice to HOC (as owner), prior to a hearing and at the residents' own cost, the resident may copy any documents or records related to the proposed adverse action;

- iv. HOC (as owner) will provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action, and the evidence HOC (as owner) relied upon as the basis for the adverse action; and
 - v. HOC (as owner) will be bound by decisions from these hearings, except if the:
 - 1) Hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing.
 - 2) Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.
 - 3) If HOC (as owner) determines that it is not bound by a hearing decision, HOC must promptly notify the resident of this determination, and of the reasons for the determination.
 - h. Establishment of Waiting List. Waiting lists will be kept in accordance with PIH Notice 2012-32 Section 1.7.C.
 - i. 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 § 960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time (please See PIH Notice 2012-32, Section 1.7.B.7).
- B. Assistance Transfer Units. HOC has determined that it will be advantageous to transfer the assistance from some of the RAD AMPs to units of similar bedroom count located at other properties controlled by HOC (or its wholly owned affiliate). Currently, HOC plans to transfer the assistance for the following number of units, by RAD AMP:

RAD AMP	Units
Seneca Ridge (Middlebrook Square)	7
Parkway Woods and Ken Gar	4
Towne Centre Place and Sandy Spring Meadow	10
Washington Square and Emory Grove	79

Any resident of a RAD AMP (at time of conversion) who is offered and accepts the transfer of the rental assistance to an Assistance Transfer Unit is entitled to the same rights as a current resident remaining at the converted RAD Property. The assistance available at Assistance Transfer Units will be PBV. Complete information on these matters may be found under the heading of "Special Provisions Affecting Conversions to PBV" in HUD's PIH Notice 2012-32 (Section 1.6.C & D), which are incorporated herein by reference and summarized below:

- a. No re-screening of tenants upon conversion.
- b. Resident right to an assisted unit, irrespective of income level; residents of Assistance Transfer Units waive the right to return to their prior units.
- c. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over three (3) years or five (5) years, as determined by HOC.
- d. Continued eligibility for Public Housing-Family Self-Sufficiency ("PH-FSS") and Resident Opportunities and Self-Sufficiency- Service Coordinators ("ROSS-SC") programs.
- e. Resident Participation and Funding: Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding (see Attachment 1B of PIH Notice 2012-032).
- f. Termination notification: HOC must provide written notification of termination of lease within a reasonable time:
 - 1. Not to exceed 30 days if health or safety of other tenants, HOC employees, or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction;
 - 2. 14 days for non-payment of rent; and
 - 3. In all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply.
- g. Grievance process. See PIH Notice 2012-32 Section 1.6.C.7.b. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:
 - 1. Residents be provided with notice of the specific grounds of the proposed owner adverse action, as well as their right to an informal hearing with the HOC (as owner);
 - 2. Residents will have an opportunity for an informal hearing with an impartial member of HOC's staff (as owner) within a reasonable period of time;
 - 3. Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the owner as the basis for the adverse action. With reasonable notice to the HOC (as owner), prior to hearing and at the residents' own cost, resident may copy any documents or records related to the proposed adverse action;
 - 4. HOC (as owner) will provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action, and the evidence HOC (as owner) relied on as the basis for the adverse action.

5. HOC (as owner) will be bound by decisions from these hearings, except if the:

- i. Hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing.
- ii. Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.
- iii. If HOC (as owner) determines that it is not bound by a hearing decision, HOC must promptly notify the resident of this determination, and of the reasons for the determination.

h. Establishment of Waiting List. See PIH Notice 2012-32 Section 1.6.D.4.

i. 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 § 960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.6.C.8; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please See PIH Notice 2012-32, Section 1.6.C.8)

C. Relocation. There is no planned offsite relocation with the exception of the Assistance Transfer Units described above. During the rehabilitation of each RAD AMP, residents may be relocated to facilitate the rehabilitation work within the RAD AMP. All relocations will be subject to the Uniform Relocation Act ("URA") and HOC will arrange for and assume all costs of relocation either on-site or off-site.

II. Vacant Units Converted Under RAD and New Tenants. After conversion under the RAD program, any new tenant of a vacant RAD Unit (whether an On-Site RAD Unit or an Assistance Transfer Unit), will be subject to the terms of HUD regulations for Project-Based Section 8. This includes the requirement that tenants have incomes no greater than eighty percent (80%) of AMI. These RAD units and their tenants will not be governed by HOC's Admissions and Continued Occupancy Policy ("ACOP") for its PH units. Each RAD Property will have its own Tenant Selection Plan developed to be consistent with efforts to Affirmatively Further Fair Housing and the provisions of HUD Handbook 4350.3 REV-1.

Arcola Towers, Elizabeth House, and Waverly House are each designated for occupancy by only the elderly. Holly Hall is designated for occupancy by the elderly and/or non-elderly disabled (NED) families /individuals. Except with respect to these four properties the RAD properties and RAD units are not designated as elderly-only and there will be no age restrictions or other preferences in the admission for tenancy. The preferences for families designated as "Federal Emergency Assisted" and residents who live and/or work, or have offered to work in the jurisdiction that were applicable under HOC's PH program will be removed.

Future applicants after the RAD conversion will be screened to ensure that they meet project eligibility requirements including citizenship requirements, disclosure and documentation of social security numbers, and income limitations. They will also be screened to determine that they will be responsible residents, which will include, but not be limited to, a review of references from previous landlords, credit history, and criminal and eviction history. In addition, Resident Selection Criteria incorporates screening requirements as established for the Section 8 program in HUD Handbook 4350.3, Occupancy Requirements for Subsidized Multi-Family Housing Programs.

After conversion of the RAD Units, future applicants for units at each RAD Property will be placed on a waiting list, processed for immediate occupancy or rejected. All eligibility factors will be verified in writing and will be kept in the applicant's file. The following procedure will be used if an applicant is found to be unacceptable:

- A. The applicant will be immediately notified if it is found that the applicant is ineligible because their income exceeds the appropriate income limits or because the applicant's family size is not suitable for the size of the available unit(s).
- B. If the applicant meets the eligibility criteria, they will be offered a unit or placed on a waiting list.
- C. The applicant will be promptly notified, in writing, of the determination of their ineligibility. The letter will explain why the applicant is not eligible.
- D. The rejection letter will advise the applicant that they have fourteen (14) days to respond in writing or request a meeting with a representative of the owner not involved in the original determination process.
- E. The rejection letter will also inform the applicant that responding to the rejection letter does not preclude the applicant from exercising other avenues available if they feel they are being discriminated against.
- F. If the applicant responds in writing and/or after a meeting is held, the applicant will be advised, in writing, whether or not the decision has changed. The letter will be sent within five (5) days from the date of the applicant's letter or from the date of the meeting.

III. On-Site Unassisted Units. As a result of the transfer of assistance to off-site Assistance Transfer Units, there will be a commensurate number and type of non-RAD units located at the RAD Property (the "On-Site Unassisted Units"). The On-Site Unassisted Units allow HOC to make units at the RAD Properties available to tenants without rental assistance and, at HOC's discretion, without income restrictions, which not only promotes the economic viability of the converted properties, but also furthers HOC's goal to deconcentrate poverty. HOC has set an initial rent level for these On-Site Unassisted Units at or below the eighty percent (80%) AMI level. There will be no difference in unit quality or amenities between the On-Site RAD Units and the On-Site Unassisted Units. Additionally, HOC will not require any resident to move from a RAD Property. Subsidy will be transferred to the Assistance Transfer Units for those units which are currently occupied by families participating in the PH-FSS program and for vacant units. In the former case, HOC will pay the costs of relocation. As previously discussed with HUD, subsidy will be transferred to these off-site Assistance Transfer Units in the form of PBV. The Assistance Transfer Units were formerly part of one of HOC's scattered site public housing developments that recently underwent disposition under Section 18 of the Act and are now owned by a wholly-owned affiliate of HOC. These scattered site units are currently undergoing substantial renovations. There is no external financing required for the renovation.

2. RAD Waiting List Modifications

The current HOC Public Housing waiting lists have been closed since 2008. All applicants on HOC's waiting lists as of March 1, 2014 will receive written notification that the list is being purged and that they will have the option to be placed on new site-based waiting lists for the RAD Properties, which will be developed based upon direction provided within and in conformity with HUD Notice PIH-2012-32 (HA), REV-1 Sections 1.6.D.4 and 1.7.C.3. Each applicant from HOC's PH waiting lists will be given commensurate priority on the newly created waiting lists for the RAD Property(ies) selected by such applicant.

Currently, HOC's Public Housing waiting lists are not site-based or project specific, but are separated into four regional lists by bedroom size with preferences for families designated as "Federal Emergency Assisted" and residents who live and/or work, or have offered to work in the jurisdiction. The selection process for each list is by preference and then random selection by lottery. After the RAD conversion, there will be site-based waiting lists for the RAD Properties (or definable portion of such property, where geographic proximity is lacking) and those lists will be maintained at the appropriate property management office. After giving priority to HOC's current waiting list applicants (as described above), the waiting lists for each RAD Property will be opened to the public. Opening of the RAD Properties' waiting list(s) will be announced on HOC's website and, where required, with a public notice stating that applications for the RAD Properties will be accepted. The public notice will state where, when, and how to apply. The public notice will be published in a local newspaper of general circulation and also by any available minority media. The public notice will state any limitations as to who may apply.

Once applications are received, date and time of receipt will be recorded. The applications will be evaluated using the criteria for admission. Any applications meeting the eligibility criteria will be placed on the waiting list. Application not meeting these requirements will be rejected and not placed on the waiting list. In the event that an applicant is rejected, the applicant will receive written notification. The applicant shall have fourteen (14) days from the date of the letter to respond in writing or to request a meeting to discuss the rejection. Each applicant's position on the waiting list will be determined by the date and time on which all of the applicant's application materials are received at the office; importantly however, acceptance to the waiting list does not automatically guarantee eligibility for a unit. Further screening as described under the eligibility section (above) will be completed at the time a unit is offered. Units will be rented to eligible applicants in accordance with the applicants' place on the waiting list.

3. RAD Assignment Modification

- A. All tenants currently participating and residing in PH units at the RAD AMPs will be admitted into converted RAD Units. After the RAD conversion, admission and selection of future tenants at these RAD Properties will be governed by HUD regulations as detailed above.
- B. Residents of RAD Units will be required to meet the following occupancy standards (as further depicted in the table below):
 - i. A single head of household or a head of household with a spousal relationship or significant other will be assigned one bedroom.
 - ii. Two members of the same gender, regardless of age, will be assigned one bedroom.
 - iii. A live-in aide will get a separate bedroom.

<u>Unit Bedroom Size</u>	<u>Family Size</u>
Efficiency	1 person
1 Bedroom	1 – 2 persons
2 Bedrooms	2 – 4 persons
3 Bedrooms	3 – 6 persons
4 Bedrooms	5 – 8 persons

- iv. Exceptions to normal bedroom size standards include the following:
 - a. Units smaller than assigned through the above guidelines – A family may request a smaller unit size than the guidelines allow. HOC will allow the smaller size unit so long as generally no more than two (2) people per bedroom are assigned.
 - b. Units larger than assigned through the above guidelines – A family may request a larger unit size than the guidelines allow. HOC will allow the larger size unit if the family provides a verified medical need that the family be housed in a larger unit.
 - c. If there are no families on the waiting list for a larger size, smaller families may be housed if they sign a release form stating they will transfer (at the family's own expense) to the appropriate sized unit when an eligible family needing the larger unit applies.
 - d. Larger units may be offered in order to improve the marketing of a development suffering a high vacancy rate.
- C. If a RAD unit with accessible features becomes vacant, management will offer the unit in the following order of priority: first, to a current resident of the RAD property who requires the accessible feature; then second, to an eligible qualified applicant on the RAD property's waiting list who requires the feature; and third, to an eligible qualified applicant on the RAD property's waiting list without a disability.

4. Deconcentration of Poverty

As a result of the transfer of assistance to off-site Assistance Transfer Units, there will be a commensurate number and type of On-Site Unassisted Units. These On-Site Unassisted Units allow HOC to make units at the RAD properties available to tenants

without rental assistance and, at HOC's discretion, without income restrictions, which not only promotes the economic viability of the converted properties, but also furthers HOC's goal to deconcentrate poverty.

2. Financial Resources

HOC will have a complete budget for FY 2014 later in calendar year 2014. Included is the FY 2013 budget information.

Financial Resources: Planned Sources and Uses		
<u>Sources</u>	<u>Planned \$</u>	<u>Planned Uses</u>
1. Federal Grants (FY 2014 grants)		
a) Public Housing Operating Fund	5,718,486	Operations
b) Public Housing Capital Fund	1,773,077	Capital Improvements
c) Annual Contributions for Section 8 Tenant-Based Assistance	85,709,455	Operations
d) Family Self-Sufficiency Grants	555,000	Operations
e) McKinney	2,604,714	Operations
f) Ross and SPC	1,076,844	Operations
2. Public Housing Dwelling Rental Income	5,524,133	Operations
TOTAL RESOURCES	102,961,709	

3. Rent Determination

(a) Public Housing:

Title 24 of the Code of Federal Regulations, Part 960, Section 253 explains that once a year, PHAs must offer each family the opportunity to choose between two methods for determining the amount of tenant rent payable monthly by the family. The family may choose to pay either a flat rent or an income-based rent. Except for in cases of financial hardship, families may not be offered this choice more than once a year. The PH minimum rent is \$50 per month.

1. Income-Based Rent:

Income-based rent is a tenant rent that is based on a family's income and HOC's rent policies for determination of such rents. As per 24 CFR, Part 5, Section 628, HOC uses the total tenant payment (TTP) amount of 30 percent of the family's monthly adjusted income, taking into account any utility allowance that may be granted to an assisted family. To determine income-based rents, HOC employs the payment standards allocated per bedroom size, deducts the TTP, and then pays the remaining amount as the PHA subsidy payment to the landlord.

Between income reexaminations tenants must report changes in income annually or changes in family composition.

2. Flat Rent:

Flat rent is a tenant rent that is pre-determined based on a unit's bedroom size and the locality in which it is located. Flat rents were designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient. Typically, a family will choose to pay the flat rent if they have a high income and the flat rent is less than 30% of their household's income. Of course, if a tenant is paying the flat rent and at any time becomes unable to pay that amount because of a financial hardship, the tenant can ask to return to an income-based rent. This change can be done even mid-year.

Until June 1, 2014 HOC established its flat rents based on the market rent of comparable units in the private, unassisted rental market. HOC used a survey of like units in the neighborhood, an HCV rent reasonableness study, and County rental data.

As of June 1, 2014, however, HOC amended its flat rent policies to comply with the new statutory changes contained within, Public Law 113 – 76, the Fiscal Year 2014 Appropriation Act. Now, HOC will set the flat rent amount for each public housing unit to comply with the requirement that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utilities costs. The new flat rent amount will apply to all new program admissions effective September 11, 2014. For current program participants that pay the flat rent amount, the new flat rent amount will be offered, as well as the income-based rent amount, at the next annual rental option.

Importantly, HOC will place a cap on any increase in a family's single year rental payment that exceeds 35 percent, and is a result of changes to the flat rental amount as follows:

- a. Multiply the existing flat rental payment by 1.35 and compare that to the updated flat rental amount;
- b. The PHA will present two rent options to the family as follows:
 - i. The lower of the product of the calculation and the updated flat rental amount; and
 - ii. The income-based rent.

(b) Housing Choice Voucher:

HOC's Housing Choice Voucher program (HCV) offers only income-based rents. No flat rent option is provided for voucher program participants. Additionally, the HCV program employs no discretionary policies for determining income-based rents. HOC uses the total tenant payment (TTP) amount of 30 percent of the family's monthly adjusted income. To determine income-based rents, HOC employs the payment standards allocated per bedroom size, deducts the utility allowance, deducts the TTP, and then pays the remaining amount as the PHA subsidy payment to the landlord.

Annually, HOC reevaluates its payment standards. Currently HOC's payment standard is at 95% of the 2014 Fair Market Rents (FMR) for Montgomery County, Maryland. The HCV minimum rent is \$50.

4. Operation and Management

The Policies governing HOC's maintenance management can be located in the policy documents in the following list.

(a) Public Housing

1. HOC Policy for the Prevention and Eradication of Pest Infestation
2. Admissions and Continued Occupancy Policy
3. Housing Management On-Call Handbook
4. Turnover Standard Operating Procedures

(b) Section 8 Management

1. Administrative Plan

5. Grievance Procedures

- (a) HOC has not established any written grievance procedures in addition to the federal requirements. Residents and applicants of the PH program should initiate contact in regards to HOC's grievance process at HOC's main administrative office.
- (b) HOC has not established any written informal review procedures for applicants or tenants of the HCV program in addition to the federal requirements. Residents and applicants of the HCV program should initiate contact in regards to HOC's informal review and informal hearing process at HOC's main administrative office.

6. Designated Housing for Elderly and Disabled Families

HOC has approved the following developments for Designated Housing:

Designation of Public Housing Activity Description
Development name: Holly Hall
Development (project) number: MD004511413
Designation type: Occupancy by only the elderly and persons with disabilities
Application status: Approved
Date this designation was Approved: 1/2014
Number of units affected: 92

Designation of Public Housing Activity Description
Development name: Arcola Towers
Development (project) number: MD004511415
Designation type: Occupancy by only the elderly
Application status: Approved
Date this designation was Approved: 1/2014
Number of units affected: 138

Designation of Public Housing Activity Description
Development name: Elizabeth House
Development (project) number: MD004511402
Designation type: Occupancy by only the elderly
Application status: Approved
Date this designation was Approved: 1/2014

Number of units affected: 158
Designation of Public Housing Activity Description
Development name: Waverly House
Development (project) number: MD004511417
Designation type: Occupancy by only the elderly
Application status: Approved
Date this designation was Approved: 1/2014
Number of units affected: 156

7. Community Service and Self-Sufficiency

- (a) HOC operates a Family Self-Sufficiency (FSS) program which currently has 369 participants. Presently, the HCV program has 316 FSS participants and the PH program has 53 participants.
- (b) Community Service Policies for Enhancement
The current policy to ensure that PH residents are in compliance with their community service requirements is to screen the PH database no less than annually to identify residents who need to complete their community service requirements. Some opportunities provided by HOC are listed below:

1. External Opportunities
Agreements are in place with various external organizations, indicating interest and willingness to serve as a placement resource for community service participants. HOC has an alliance with the County Volunteer Clearinghouse for volunteer placements as well. Additionally, residents are encouraged to develop volunteer placement resources of their own through their affiliation with their churches, schools and other acceptable organizations.
2. Internal Opportunities
HOC serves as a resource for placements under the condition that no resident would be placed in areas where there is sensitive or confidential information.

Community volunteers who work in concert with the Property Management Division will perform duties under the strictest of circumstances to make sure that work does not supplant the work of any paid employee or contractor and there is sufficient supervision of the worker at all times while work is in progress.

HOC will afford each Community Service participant with appropriate support prior to any adverse action taken against the resident. Participants may seek redress through the HOC Grievance Procedures.

HOC will continue to comply with requirements of community service in regards to the treatment of income changes resulting from welfare program requirements. Some of the actions HOC is taking include training staff on rent determination policies and informing residents of any policy changes at admission and reexamination. HOC has a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services.

- (c) Section 3

HOC developed a new Section 3 policy in March of 2014. This policy went into effect in April of 2014.

The Section 3 program was established by the Housing and Urban Development Act (HUD) of 1968 (as amended). Section 3 is a legislative directive for providing employment, training and contracting opportunities for low and very-low income residents in public housing projects and communities that receive HUD funding for projects. The regulations codifying the Section 3 program can be found at 24 CFR 135. As a public housing agency (PHA) and recipient of various sources of HUD funding, HOC has several responsibilities for developing and implementing a Section 3 policy and program. Below is a list of some, but not all, of HOC's responsibilities under the statute:

1. Implement procedures to monitor compliance with Section 3.
2. Notify contractors of Section 3 responsibilities.
3. Facilitate training and employment of Section 3 residents.
4. Facilitate award of contracts to Section 3 businesses.
5. Penalize non-compliance.
6. Submit Annual Section 3 Summary Report.

HOC's Section 3 policy is triggered when a covered project creates the need for new employment, contracting or training opportunities. Recipient agencies and their contractors are not required to hire Section 3 residents or award contracts to Section 3 businesses other than what is needed to complete covered projects. Section 3 covered trades include: carpentry, masonry, plumbing, electrical, and demolition work. Covered management and administrative work includes: architectural, engineering, legal, management and administrative support. A copy of the HOC Section 3 Policy can be obtained at the Kensington Avenue office.

8. Safety and Crime Prevention

- (a) The need to ensure safety is based on providing safe housing to HOC residents. HOC has provided crime prevention activities targeted to at-risk youth, adults, and seniors and has implemented the housing provisions from the Violence Against Women Act of 2005 (VAWA). HOC has coordinated with the local police departments, including the police providing crime data to the housing authority for analysis and action. The police also offer a physical presence at housing authority properties and in some instances officers will live in residence. Police are also available to meet with HOC management and to testify and support eviction cases.

9. Pets

- (a) The following are the Pet Ownership policies established by HOC for its PH units:
1. A \$200 refundable, non-interest-bearing deposit for a cat, dog, or ten-gallon aquarium, payable over three months. There is a \$10 monthly fee for these pets.
 2. No deposits for caged animals.
 3. Limit of one cat or dog per household.
 4. Limit of adult weight of 25 pounds.
 5. Resident must provide record of current vaccinations and registration in compliance with Montgomery County law. Records will be kept in the resident's file.
 6. A dog or cat must be neutered or spayed before six months of age.
 7. The pet will be allowed out of the premises only in designated areas and only under the complete control of the responsible human companion, and on a hand held leash or in a pet carrier.
 8. Each dog or cat must wear a collar with identification.
 9. Dangerous animals and potentially dangerous animals, as defined in Montgomery County Code Section 5, are not permitted. The County Code defines dangerous pets as any animal deemed dangerous by a local authority, one that has attacked unprovoked and inflicted injury outside the owner's property. HOC has the option to ban from its properties any animal it deems dangerous.
 10. Pet waste must be cleaned up and properly disposed of. Cat litter is not to be disposed of in toilets.
 11. Pet must be secured in a cage or separate room when HOC staff has scheduled access to the unit or needs to provide service to the unit.
 12. Residents must complete a Pet Applications/Registration form with their property manager. Residents must also sign a Pet Addendum to their lease.

10. Civil Rights Certification

- (a) HOC regularly examines its existing and proposed programs to ensure that they are consistently compliant with fair housing policies and regulations. In so doing, HOC ensures that any impediments to fair housing choice that may exist within its existing or proposed programs are promptly addressed via removal of such practices from the program's regulations and administration. Towards this end, HOC works with Montgomery County on various different initiatives to affirmatively further fair housing.
- (b) HOC has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction of Montgomery County, Maryland.
1. During the development of this PHA Plan, HOC staff reviewed the current Consolidated Plan of Montgomery County to ensure HOC's PHA Plan will be consistent with Montgomery County's Consolidated Plan.
 2. Activities to be undertaken by HOC in the coming year are consistent with the initiatives contained in the Montgomery County Consolidated Plan. These include development, modernization, and preservation of affordable housing as well as the development of special needs housing.
 3. During the development of this PHA Plan, Montgomery County staff reviewed this PHA Plan, and offered their guidance and advice so as to ensure HOC's PHA Plan will be consistent with Montgomery County's Consolidated Plan.

11. Fiscal Year Audit

HOC was required to submit an audit to HUD. The results of that audit indicate HOC conforms to accepted accounting principles.

12. Asset Management

As per HUD's *Supplemental Guidance on Phase-in Management Fees*, HOC will maintain overhead allocations for overhead costs in lieu of fee-for-service through 2014. Therefore, HOC will not use Fee for Service, but HOC will bill its Central Office overhead at cost, utilizing a Cost Allocation Plan.

Through 2014, HOC will maintain overhead allocations and it will report that allocated overhead on the income statement for each project under a new FDS line item called "Allocated Overhead."

Other direct project costs, such as the salary of the maintenance staff or costs associated with administering the waiting list must be appropriately reflected on the project's income statement.

Allocated overhead expenses, as opposed to management fees, are covered under all applicable Federal program rules.

HOC will not create a Central Office Cost Center (COCC). Instead, it will maintain an overhead internal service fund.

13. Violence Against Women Act (VAWA)

To help meet the goals of the Violence Against Women Act (VAWA), HOC provides support and referrals to counseling for victims of domestic violence, sexual assault, or stalking. The County Department of Health and Human Services' Abused Persons Program (240-777-4673) provides 24 hour services, including access to counseling and shelter. HOC has adopted procedural language to ensure that victims retain housing assistance. HOC also assists victims with referrals to obtain restraining orders.

Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable.

(a) Hope VI or Mixed Finance Modernization or Development

HOC does not have any HOPE VI or Mixed Finance funding.

(b) Demolition and/or Disposition of Public Housing:

HOC received HUD approval for, and is in the process of disposing of, 669 units of public housing under Section 18 of the Housing Act. 100 of these units will become Assistance Transfer Units under the RAD program (see Section 6.1(c)).

(c) Conversion of Public Housing:

The conversion of PH Units to RAD Units under the RAD program entails (i) the renovation of 268 single family and townhome units in 3 RAD AMPs, (ii) the renovation of 141 units at two elderly properties in 2 RAD AMPs, (iii) the construction of 256 new units to replace the existing units which will be demolished at an elderly property and property designated for elderly and NED in 2 RAD AMPs, and (iv) the transfer of assistance for 100 units from 4 separate RAD AMPs to newly renovated single-family homes. These are described below, grouped by RAD AMP or by specific property.

Seneca Ridge (aka Middlebrook Square)		
Bedroom Size	# Units	Unit Type
Efficiency	2	Family
2 Bedrooms	9	Family
3 Bedroom	40	Family
4 Bedroom	20	Family
Total Units	71	

Seneca Ridge is a 71 unit townhome community consisting of 2 one-bedroom units, 9 two-bedroom units, 40 three-bedroom units, and 20 four-bedroom units that were originally constructed in 1970 and underwent major renovations in 2008. It is located on approximately 8.5 acres principally at 19568 Scenery Drive, Germantown, MD.

Parkway Woods / Ken Gar		
Bedroom Size	# Units	Unit Type
2 Bedrooms	16	Family
3 Bedroom	14	Family
4 Bedroom	13	Family
Total Units	43	

Parkway Woods is a 24 unit townhome community consisting of 9 two-bedroom units, 9 three-bedroom units, and 6 four-bedroom units, originally constructed in 1980. It is located on 2 acres at 12933 Twinbrook Parkway, Rockville, MD 20851.

Ken Gar is a 19 unit community which includes 15 townhouses and 4 single-family detached homes consisting of 7 two-bedroom units, 5 three-bedroom units, and 7 four-bedroom units, originally constructed in 1979. It is located principally at 10731 Shaftsbury Street, Kensington, MD 20895.

Towne Centre Place / Sandy Spring Meadow		
Bedroom Size	# Units	Unit Type
1 Bedroom	14	Family
2 Bedrooms	45	Family
3 Bedroom	42	Family
4 Bedroom	3	Family
Total Units	104	

Towne Centre Place is a 49 unit townhome community consisting of 14 one-bedroom units, 20 two-bedroom units, and 15 three-bedroom units, originally constructed in 1986. It is located on 3.63 acres at 3502 Morningwood Drive, Olney, MD.

Sandy Spring Meadow is a 55 unit community consisting of 25 townhouses and 30 single family homes. All townhomes have two bedrooms and a bath, and family homes have three or four bedrooms with 1.5 to 2 baths. The units were originally constructed in 1980 and are located on 3.87 acres at 1 Branchwood Court, Sandy Spring, MD.

7.0

Washington Square		
Bedroom Size	# Units	Unit Type
2 Bedroom	10	Family
3 Bedroom	32	Family
4 Bedroom	8	Family
Total Units	50	

Washington Square is a 50 unit townhome community consisting of 10 two-bedroom units, 32 three-bedroom units, and 8 four-bedroom units originally constructed in 1968 and renovated in 2002. It is located at 8343 Fairhaven Drive in Gaithersburg, MD 20877.

There is no proposed change in the number or bedroom size at any of the above RAD AMPs or properties. The work will take place in and around both occupied and vacant units, all owned and managed by HOC. HOC property management will provide access to all units, and will coordinate the scheduling of the work and the day-time vacating of the units by the residents to temporary "Hospitality Suites" provided by HOC, as needed.

General Scope of Work for the above-referenced properties

HOC has engaged and qualified contractors that are currently performing Physical Condition Assessments ("PCA") at each RAD AMP, which includes a Green Building component. HOC will rehabilitate the units at the RAD Properties and include funding in the transition Financing Plan for each RAD Property to anticipate future capital needs as identified in the respective PCA. The scope of the PCA and subsequent rehabilitation are designed to be in conformity with HUD Notice PIH-2012-32 (HA), REV-1 Section 1.4(A)(1).

The anticipated renovations will include all or some of the items listed below, to be decided on a unit-by-unit basis by HOC:

- Interior work, such as replacement of:
 - kitchens and bathrooms (appliances, cabinets, fixtures, finishes)
 - flooring
 - painting
 - HVAC systems
 - electrical modifications
 - unit cleaning
- Exterior work, such as replacement of:
 - Windows
 - roofs, gutters and downspouts
 - siding
 - sidewalks, stoops, fencing and concrete walks
 - grading and stormwater management
 - landscaping
 - trash removal

The scope of the rehabilitation for Washington Square will likely include small enhancements to its façade and grounds, driven by market factors, in order to enhance the long-term value of the property for HOC and its tenants.

The final scope for each of the above properties will be developed in conjunction with HOC's selected architect. After construction, the building and housing units are expected to meet Enterprise Green Communities standards. All work to be performed will be completed under the International Existing Building Code (IEBC) and all applicable Montgomery County construction codes.

Emory Grove		
Bedroom Size	# Units	Unit Type
1 Bedroom	6	Family
2 Bedroom	21	Family
3 Bedroom	18	Family
4 Bedroom	9	Family
Total Units	54	

Emory Grove is a 54 unit townhome community consisting of 6 one-bedroom units, 21 two-bedroom units, 18 three-bedroom units, and 9 four-bedroom units originally constructed in 1970. It is located at 8107 Morningview Drive in Gaithersburg, MD 20877.

The Emory Grove units will be demolished and the assistance from these units will be transferred to 54 single-family units owned by an entity that is wholly-owned by HOC. The units will be newly renovated to provide amenity-rich, energy efficient systems and appliances based on market comparables.

Arcola Towers		
Bedroom Size	# Units	Unit Type
1 Bedroom	141	Elderly
Total Units	141	

Arcola Towers is a 141 unit elderly high-rise property consisting of 141 one-bedroom units. It is located at 1135 University Boulevard in Silver Spring, MD 20902.

The Arcola Towers units will be substantially rehabilitated. The final scope for the rehabilitation will be developed in conjunction with HOC's selected architect. After construction, the building and housing units are expected to meet Enterprise Green Communities standards. All work to be performed will be completed under the International Existing Building Code (IEBC) and all applicable Montgomery County construction codes.

Waverly House		
Bedroom Size	# Units	Unit Type
1 Bedroom	156	Elderly
2 Bedroom	2	Elderly
Total Units	158	

Waverly House is a 158 unit elderly high-rise property consisting of 156 one-bedroom units and 2 two-bedroom units, originally constructed in 1978. It is located at 4521 East West Highway in Bethesda, MD 20814.

The Waverly House units will be substantially rehabilitated. The final scope for the rehabilitation will be developed in conjunction with HOC's selected architect. After construction, the building and housing units are expected to meet Enterprise Green Communities standards. All work to be performed will be completed under the International Existing Building Code (IEBC) and all applicable Montgomery County construction codes.

Elizabeth House		
Bedroom Size	# Units	Unit Type
Efficiencies	40	Elderly
1 Bedroom	100	Elderly
2 Bedroom	20	Elderly
Total Units	160	

Elizabeth House is a 160 unit elderly high-rise property consisting of 40 efficiencies, 100 one-bedroom units, and 20 two-bedroom units, originally constructed in 1970. It is located at 1400 Fenwick Avenue in Silver Spring, MD 20910.

The Elizabeth House units will be demolished and a replacement building will be constructed on an adjacent site. The final scope for the new construction will be developed in conjunction with HOC's selected architect. After construction, the building and housing units are expected to meet Enterprise Green Communities standards. All work to be performed will be completed under the International Existing Building Code (IEBC) and all applicable Montgomery County construction codes.

Holly Hall		
Bedroom Size	# Units	Unit Type
Efficiencies	1	Family
1 Bedroom	53	Family
2 Bedroom	42	Family
Total Units	96	

Holly Hall is a 96 unit property consisting of one efficiency unit, 53 one-bedroom units, and 42 two-bedroom units, originally constructed in 1965. It is located at 10110 New Hampshire Avenue in Silver Spring, MD 20903.

The public housing units at Holly Hall will be replaced with newly constructed units.

(d) Homeownership

HOC operates a Housing Choice Voucher Homeownership Program (HCVH). This program offers eligible participants in the HCVH program an option to own their own home, using their existing Housing Choice Voucher (HCV). The voucher for homeownership works similarly to the voucher for rental. The household spends approximately 30% of its income for the mortgage payment and the voucher pays the difference. Importantly, the family using its voucher for homeownership must be able to qualify for a mortgage according to the accepted and prevailing industry loan qualification requirements.

Per HOC regulations, HOC's HCVH program is only open to 25 households at a time. These 25 households are selected by HOC through a random selection process. When all 25 spots are full, the HCVH program will be listed as closed. A status of closed in this regard does not mean that the program is inactive, but rather that the program but is full and therefore not accepting new applicants at this time.

Participating families in HOC's HCVH program are selected through a Commission approved random selection process and must meet all of the following criteria:

1. A current HCV Program Recipient.
2. Minimum annual income of \$24,000.
3. The family must meet the minimum down payment of 3% of purchase price, 1% of which must come from the family's personal resources.
4. Family must work at least 30 hrs per week and be employed for at least one year (the elderly and disabled are eligible to apply for an exemption from this requirement).
5. Family must participate in HOC's Family Self Sufficiency Program (FSS) for at least two years (the elderly and disabled

	are eligible to apply for an exemption from this requirement). 6. Family must complete homeownership counseling provided by HOC or an agency approved by HUD and/or HOC prior to homeownership assistance. 7. Family cannot have any outstanding debt to HOC or any other housing agency. 8. Family must be a first time homebuyer, and no member of the household can have an ownership interest in a residence. 9. If previously married and you owned a home with your spouse, and now you are a single parent, displaced homemaker, you will be considered as a first time homebuyer. (e) Project-Based Vouchers As explained above in Section 6.1(c), all but seven of HOC's existing PH units will be converted to PBRA and PBV over the next five years. In particular, the PBV RAD units will be those that HOC has determined it will be advantageous to transfer the assistance from some of the RAD AMPs to units of similar bedroom count located at other properties controlled by HOC (or its wholly owned affiliate). Currently, HOC plans to transfer the assistance for the following 100 units, divided amongst RAD AMPs as follows: <table border="1" data-bbox="573 527 1162 695"> <thead> <tr> <th>RAD AMP</th><th>Units</th></tr> </thead> <tbody> <tr> <td>Seneca Ridge (Middlebrook Square)</td><td>7</td></tr> <tr> <td>Parkway Woods and Ken Gar</td><td>4</td></tr> <tr> <td>Towne Centre Place and Sandy Spring Meadow</td><td>10</td></tr> <tr> <td>Washington Square and Emory Grove</td><td>79</td></tr> </tbody> </table> Any resident of a RAD AMP at time of conversion, who is offered and accepts the transfer of the rental assistance to an Assistance Transfer Unit, is entitled to the same rights as a current resident remaining at the converted RAD Property. The assistance available at Assistance Transfer Units will be PBV. In this way, HOC plans to expand its use of the Project-Based Voucher program this fiscal year. The use of PBVs gives HOC's tenants access to neighborhoods outside of high poverty areas as well as maintains their housing assistance even when transferred off-site during the RAD conversion. Prior to the RAD conversion, HOC has approximately 634 PBV units located in 33 different affordable housing projects located throughout Montgomery County. The RAD conversion will increase this number to 734 PBV units in Montgomery County.	RAD AMP	Units	Seneca Ridge (Middlebrook Square)	7	Parkway Woods and Ken Gar	4	Towne Centre Place and Sandy Spring Meadow	10	Washington Square and Emory Grove	79
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8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.										
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing. See HUD Form 50075.1, submitted by HOC to HUD in April of 2014.										
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. See HUD Form 50075.2, submitted by HOC to HUD in April of 2014.										
8.3	Capital Fund Financing Program (CFFP). ☐ Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.										

9.0	Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. As identified in the Montgomery County Consolidated Plan, employment opportunities, strong schools, and a large array of quality amenities make Montgomery County a highly desirable place to live. Consequently, the County's population has grown significantly over the last decade and is projected to continue to grow at a rapid pace for at least the next 10 years. Along with this rapid level of population growth has come an increase in the housing demands placed on Montgomery County's existing supply. Within the sphere of affordable housing, these demographic trends have led to significant increases in the demand for affordable housing; demand that far exceeds the County's current supply of affordable housing options. Although Montgomery County and HOC programs beyond the federal programs are more widespread than those in many similar jurisdictions, HOC recognizes that more still needs to be done. With roughly 500 square miles and nearly one million people, Montgomery County is among the largest jurisdictions and is the most populous county in Maryland. Combined with one of the highest costs of living in the country, the present day and coming challenges to the provision of affordable housing in Montgomery County are particularly acute. As of April 2014, HOC had approximately 15,589 applicants on its Housing Choice Voucher waiting list and approximately 33,235 on its public housing waiting list. In particular, HOC has identified the following specific housing needs of its low-income, very low-income, and extremely low-income residents that must be addressed over the next five years: 1. Expansion and preservation of the supply of assisted housing in Montgomery County. 2. Continued improvement of the quality of HOC assisted housing. 3. Increased amount and variety of assisted housing choices. 4. Provision of an improved living environment. 5. Promotion of self-sufficiency and asset development of assisted households. 6. Assurance of equal opportunity and fairness in housing for all HOC residents. 7. Servicing the needs of children and adult victims of domestic violence, dating violence, sexual assault, or stalking.
9.1	Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan. So as to address the identified housing needs of HOC residents described in Section 9.0 above, the following strategies will be employed by HOC during the five years covered by this Plan: 1. When available, HOC will apply for additional rental vouchers; reduce public housing vacancies; leverage private or other public funds to create additional housing opportunities; and acquire or build units or developments. 2. HOC will improve its public housing management, as measured by its PHAS score; improve voucher management, as measured by its SEMAP score; increase customer satisfaction; concentrate on efforts to improve specific management functions; renovate or modernize public housing units; demolish or dispose of obsolete public housing, if appropriate; and ensure that alternatives such as replacement public housing or replacement vouchers are available. 3. HOC will conduct outreach efforts to potential voucher landlords and continue its voucher homeownership program. 4. HOC will actively work to deconcentrate poverty by converting our existing PH properties into PBRA and PBV units using the RAD program; implement measures to promote income mixing in HOC owned properties by assuring access for lower-income families into higher income developments and adding market rate units into properties that were previously exclusive to low-income households; implement security improvements to our existing housing stock; and maintain existing designations of developments for particular resident groups. 5. HOC will continue to work to increase the number and percentage of employed persons in assisted families; provide or attract supportive services to improve assistance recipients' employability; provide or attract supportive services to increase independence for the elderly and/or families with disabilities. 6. HOC will continue to undertake affirmative measures to ensure access to assisted housing for all qualified applicants regardless of race, color, religion, national origin, sex, familial status, disability, or source of income; undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, disability, or source of income; undertake affirmative measures to ensure accessible housing is available to persons with all varieties of disabilities regardless of unit size required. 7. HOC will continue to follow and, as needed train staff on, procedures to ensure that to the maximum extent feasible victims of domestic violence, dating violence, sexual assault, or stalking will retain their housing assistance, develop and maintain effective relationships with providers of assistance, and support the children and adult victims of these terrible acts.

10.0	Additional Information. Describe the following, as well as any additional information HUD has requested. (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. HOC has met all of its goals in the expiring Five-Year plan. HOC has developed and is developing affordable, mixed-use developments in Montgomery County, such as Metropointe in Wheaton. HOC has created two customer service centers, one down-County in Silver Spring and the second up-County in Gaithersburg. HOC has used ARRA money to expand its public housing rehabilitation efforts. HOC continues its efforts through newsletters and forums to reach out to landlords for the voucher program. HOC has reviewed and enhanced security and self-sufficiency efforts for its residents. HOC has continued to work with staff and other agencies on its fair housing efforts. Between 2009 and 2013, HOC conducted multiple trainings for both HOC staff and outside parties on fair housing, domestic violence, and other issues. HOC implemented policies and procedures to ensure full compliance with the Violence Against Women Act (VAWA). HOC expanded its allocations of Veterans Affairs Supportive Housing (VASH) and Non Elderly Disabled (NED) vouchers. (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification" The following shall require the execution and submission to HUD of a Significant Amendment to this PHA Plan: - Any revision or addition to HOC policies covering demolition or disposition, designation, homeownership programs, or conversion activities; provided, however, that no Significant Amendment shall be required regarding the conversion of public housing units under RAD until HOC has detailed, property-specific plans and information on the conversion. - Changes to rent (excluding changes in flat rent schedules) or admissions policies or organization of the waiting lists. The following shall not be deemed a Substantial Deviation from the PHA Plan: - The decision to convert to either PBRA or PBV assistance, - The date the Significant Amendment is submitted to HUD or posted to the PHA Plan website, - Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, irrespective of whether the proposed conversion will include the use of additional Capital Funds, - Changes to the construction and rehabilitation plan for each approved RAD conversion, - Changes to the financing structure for each approved RAD conversion, and - De minimus (less than ten percent (10%)) changes in the number of Assistance Transfer Units.
11.0	Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office. (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) (c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) (d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) (i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)

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 5-Year and Annual PHA Plans. 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 and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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 there under 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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

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

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **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.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance 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.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall 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, and; 5) the number of units affected.
7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (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.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of 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.
13. **Violence Against Women Act (VAWA).** 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.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or 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 HOPE VI or Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: **(1)** A description of any housing (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; and **(2)** A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that **approved and/or pending** demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: **1)** A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received under this chapter 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>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:
<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.