

5.2. A GOALS AND OBJECTIVES

1. **Expand the supply of assisted housing.**

- a. Apply for additional rental vouchers
- b. Acquire or build units or developments
- c. Support the development of other affordable housing in the 5-county service area

2. **Improve the quality of assisted housing**

- a. Improve or maintain housing voucher management (SEMAP score)

3. **Increase Assisted housing choices**

- a. Provide voucher mobility information and counseling
- b. Conduct outreach efforts to potential voucher landlords;
- c. Support efforts to expand home ownership opportunities for low to moderate income families.

4. **Promote self-sufficiency and asset development of assisted households**

- a. Apply for available funding to maintain or increase the number of households that can be served under the Family Self Sufficiency Program.
- b. Administer the Independent Development Accounts for the greatest number of low income families;
- c. Provide financial management education to low income families;
- d. Provide homebuyer education training.
- e. Provide or attract supportive services to increase employability
- f. Provide or attract supportive services to increase independence for the elderly.

5. **Ensure equal opportunity and affirmatively further fair housing objectives**

- a. Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability;
- b. 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 and disability;
- c. Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

5.2 B PROGRESS IN MEETING THE MISSION AND GOALS

The Mid-Columbia/Columbia Gorge Housing Consortia made progress in meeting our mission and goals in the following areas:

- 1. We increased the availability of assisted housing through award of \$275,000 in the HOME program to assist special needs populations who were homeless including domestic violence survivors, persons with mental and emotional disabilities, farm-workers.
- 2. Through the review and adjustment of our Voucher Payment Standards we were able to give more households an opportunity to successfully locate a suitable dwelling under Section 8.
- 3. We created a culture of continuous improvement and innovation that demonstrates cost-effectiveness, creates value, and diversifies revenues by participating in the Mid-Columbia Rental Association and making an annual presentation.
- 4. We promoted self-sufficiency and asset development of families and individuals by serving 68 households throughout the year on the FSS program. VIDA and homeownership counseling available through our Mid-Columbia Housing Resource Center.

Current FSS Participation is as follows:

DECEMBER 1, 2010	OR	WA	Total
Participating Families in FSS	25	16	40
Participants with Positive Escrow Accounts	11	6	17
Avg. Escrow of Active Participants	\$1302	\$1017	

5. We helped ensure equal opportunity in housing through continued efforts to inform all applicants and participants of their legal rights as renters, through on-going training of all staff on Fair Housing and ADA compliance and through written information provided in our tenant briefings. The Housing Authority co-sponsored Fair Housing Training for landlords and staff. We have a partnership with County Government to help address impediments to Fair Housing identified through the Consolidated Plan Process.
6. We have maintained contact with Resident Advisory Board members to encourage involvement in Agency Planning activities.
7. We have promoted community involvement by doing informational briefings at various community service agencies. Staff has worked hard at creating an open line of communication to landlords, as well as social service agencies.
8. We continue to participate with Washington Gorge Action Program formerly KSDC, and Mid-Columbia Community Action Council in Oregon to develop and implement a Continuum of Care Plan for chronic homeless throughout Klickitat and Skamania Counties and Wasco, Hood River and Sherman Counties.
9. We pursued opportunities to preserve affordable housing throughout the Gorge as RD properties and LIHTC properties reach their expiration dates.
10. Completed leaseup for Celilo Gardens a newly constructed six plex for homeless persons with serious mental illness.
11. The Housing Authority is part owner on Hood River Crossing. Started construction on 40 unit LIHTC project in Hood River. Ten project based vouchers will be available in the property, with preference for farmworkers.
12. The Housing Authority is now the managing member for a 25 unit LIHTC Project, West Park Place that was refinanced in 2010.
13. The Housing Authority supported the acquisition and rehab of 8 units and new construction of 8 additional units on the same site. The project was completed and leased in 2010.
14. Submitted an application for Family Unification Vouchers
15. Maintained high performer status in the Administration of the Section 8 Voucher Program.
16. Supported CCHC as they launched a new Home Repair program in Wasco County and completed a Home Repair program using CDBG funds.
17. Through the MC Housing Resource Center--we served over 450 households with homebuyer education, counseling and referral to other housing resources.
18. Supported CCHC in the application for a HUD 202 project in Cascade Locks.

6.0	<p>PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: A section is added on Project Based Vouchers. The Mid-Columbia/Columbia Gorge Housing Authority (MCHA) has determined that project-basing some of its housing vouchers (not to exceed 20% of the inventory) is in the community's interest. This effort is an appropriate option because it will deconcentrate poverty and expand housing and economic opportunity. The specifics of what the Housing Authority is seeking will be contained in an advertisement published in the manner prescribed by HUD that varies depending upon whether the units to be brought into the program are new construction, rehabilitated, or existing units. The actual selection of the units to be project-based shall also be in full accordance with HUD requirements.</p> <p>A separate waiting list will be maintained for Project Base Vouchers. Preferences may be established for Project Base Vouchers that meet the housing needs in the community.</p> <p>(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.</p> <p>The 5 Year and Annual Plan are available at the main administrative office of the Mid-Columbia Housing Authority, 312 Court Street, Suite 419, the Dalles, Oregon 97058. Copies may be requested in person or by phone (541-296-5462 or Toll Free 1-888-356-8919 or by Fax at 541-296-8570 or by email to: info@mid-columbiahousingauthority.org</p>
7.0	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.
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.
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.
8.3	Capital Fund Financing Program (CFFP). <input type="checkbox"/> 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.

**9.0-1 Housing Needs of Families in the Jurisdiction
Hood River, Wasco, Sherman Counties – Oregon
Klickitat & Skamania Counties – Washington
By Family Type**

Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% AMI							
Oregon	1681	5	4	3	2	4	2
Washington	990	5	5	4	2	4	2
Income >30% but <=50% of AMI							
Oregon	1960	5	4	3	2	3	2
Washington	1292	5	4	3	2	3	2
Income >50% but <80% of AMI							
Oregon	2796	5	2	2	2	2	1
Washington	1585	5	2	2	2	2	1
Elderly 1 & 2 Person households							

**9.0-1 Housing Needs of Families in the Jurisdiction
Hood River, Wasco, Sherman Counties – Oregon
Klickitat & Skamania Counties – Washington
By Family Type**

Family Type	Overall	Afford-ability	Supply	Quality	Accessib-ility	Size	Location
Oregon	4308	5	5	4	5	1	2
Washington	958						

Families with Disabilities							
Oregon:							
Psychiatric	705	5	5	5	5	2	2
Alcohol/Drug Addiction	3824	5	5	5	5	2	2

<u>Family Type</u>	Hood River County		Wasco County		Sherman County	
	<u>Total #</u>	<u>%</u>	<u>Total #</u>	<u>%</u>	<u>Total #</u>	<u>%</u>
Hispanic (All Races) Poverty Rate	4,921 34.0%	24.6	2,166 24.8%	9.3	89 4.6%	4.6
Black Poverty Rate	51 0.0%	.3%	105 8.6%	.4%	12 0%	.6%
Native American Poverty Rate	179 14.0%	.9%	839 24.2%	3.6%	41 19.5%	2.1%
Asian/Pacific Island Poverty Rate	310 8.5%	1.6%	198 11.3%	.9%	14 21.4%	.7%

<u>Family Type</u>	Skamania County		Klickitat County	
	<u>Total#</u>	<u>%</u>	<u>Total#</u>	<u>%</u>
Hispanic (All Races)	398	5.8%	1,496	9.6 %
Black	30	<1%	105	<1%
Native American	217	2.4%	665	3.6%
Asian/Pacific Island	310	.8%	198	1.0%

Affordable Housing needs for all families living below the poverty level is ranked high

B. Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.**

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
MCHA – MID-COLUMBIA HOUSING AUTHORITY			
CGHA – COLUMBIA GORGE HOUSING AUTHORITY			
	# of families	% of total families	Annual Turnover (Terminations from Section 8 Program)
Waiting list total	767 - MCHA 386 - CGHA 1153 - Combined		81 – 16% 34 – 14% 115 Combined Total
Extremely low income <=30% AMI	451 – MCHA 270 – CGHA 721 - Combined	58.79% 69.94% 62.53%	
Very low income (>30% but <=50% AMI)	189 – MCHA 72 – CGHA 271 - Combined	24.64% 18.65 36.20%	
Low income (>50% but <80% AMI)	110 – MCHA 35 – CGHA 145- Combined	14.33% 9.06% 12.57%	
Families with children	473 - MCHA 223 - CGHA 696 Combined	61.66% 57.78% 60.37%	
Elderly families	280- MCHA 159 - CGHA 439 Combined	36.5% 45% 38%	
Families with Disabilities	288 - MCHA 164 - CGHA 452 Combined	37.55% 42.49% 39.2	
Race/ethnicity Black	24 - MCHA 3 - CGHA	3.12% <1%	
Race/ethnicity American Indian	17 - MCHA 23 - CGHA	2.2% 6%	
Race/ethnicity Asian	26 - MCHA 4 - CGHA	3.38% 1.0%	
Race/ethnicity Hispanic	64 - MCHA 11 - CGHA	11.34% 2.85%	
Total Minority	195 – Combined	16.91%	

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Waiting list type: (select one) PROJECT BASE VOUCHERS			
<input checked="" type="checkbox"/> Hood River Crossing - Hood River, Oregon			
MCHA – MID-COLUMBIA HOUSING AUTHORITY			
	# of families	% of total families	Annual Turnover (Terminations from Section 8 Program)
Waiting list total	189 -		Not leased yet
Extremely low income <=30% AMI	80	42.3%	
Very low income (>30% but <=50% AMI)	109 –	57.67%	
Low income (>50% but <80% AMI)	<u>0</u>		
Families with children	117	62.%	
Elderly families	17	9%	
Families with Disabilities	55	29%	
Race/ethnicity Black	3	1.5%	
Race/ethnicity American Indian	3	1.5%	
Race/ethnicity Asian	2 -	1%	
Race/ethnicity Hispanic	66 -	35%	
Total Minority	74–	39%	

9.1	<p>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.</p> <p>The Section 8 Housing Choice Voucher program is the primary operating program within the 5-County service area to provide decent, affordable housing to low income families and families with disabilities. Our strategy is to operate the program in an efficient manner so as to serve the maximum number of households each month with the funding that is available. We will apply for additional housing assistance when available. We will support the development of affordable housing throughout the District.</p>
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10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(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. (See attached A)</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA’s definition of “significant amendment” and “substantial deviation/modification”</p> <p>Any change to rent or admission policies or organization of the waiting list.</p>
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11.0	<p>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.</p> <p>(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)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(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.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>
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EXHIBIT "A" PROGRESS IN MEETING THE MISSION AND GOALS

The Mid-Columbia/Columbia Gorge Housing Consortia made progress in meeting our mission and goals in the following areas: (See 5.2B)

EXHIBIT "B" RESIDENT COMMENTS: (MINUTES FROM RESIDENT ADVISORY BOARD MEETING Mid-Columbia Housing Authority-Columbia Gorge Housing Authority

Resident Advisory Board Meeting Thursday March 16, 2011 12:00 p.m. Mid-Columbia Housing Authority Suite 419 312 Court St. Ste. 419, The Dalles, OR 97058

ATTENDANCE SECTION 8 PARTICIPANTS	Carol Brisbane, Angela Brokaw, Frances Brown, Donna Chandler, Lonnie Decourcy, Diane Hanson, , Cleo Miller, Edna Siler, Kent Webb
ATTENDANCE STAFF	Ruby Mason, Executive Director; Misha Peel, Family Self Sufficiency Coordinator and Tammy Henderson, Section 8 Certifier/Inspector.
MEETING TIME OPENING OF MEETING	The meeting opened at 12:00 p.m. Once everybody had a light lunch with pizza and soda, Ruby started the meeting explaining the purpose of the meeting, followed by introductions. Ruby explained that everyone who came would receive a check to cover mileage or \$25 whichever was greater. Residents were asked how long they had received Assistance under the Housing Choice Voucher program and any indicate any special interests/concerns.
MCHA CORE VALUES	Misha Peel started with a PowerPoint presentation (see Attachment); brief overview of MCHA/CGHA's Core Values : Service ... Efficiency... Respect... Value... Involvement... Creativity... Excellence...
MISSION STATEMENT	Our Mission: Our special responsibility is: "To promote adequate and affordable housing, economic opportunity, and a suitable living environment, free from discrimination" to those who find barriers due to disability, special needs or income.

AGENCY PLAN , 2011 PHA ANNUAL PROGRESS

Attendees were given copies of MCHA PHA 5 Year and one year plan starting in 2011; Ruby reviewed the 5 year goals and made reference to the progress made during the last year toward meeting housing goals.

The power point included a description of the key programs operated by the Housing Authority including Section 8 Housing Choice Vouchers, HOME Tenant Based Assistance, Family Self Sufficiency, Shelter Plus Care and Vida. The last slide showed photos of staff. Ruby gave a brief description of each staff person's primary responsibilities, in case residents had questions or that they could answer:

Key Staff

1. Misha Peel (no photo) does FSS in Washington.
2. Dave Peters: Housing Resource Center helps with home loans, Homebuyer classes,
 - a. Rehabilitation loans for low income.
3. Ryan Rooper: our Accountant writes checks for rent and other business transactions.
4. Tammy Henderson: Caseworker for The Dalles area clients.
5. Rene Bringman: Caseworker for Washington and clients out of The Dalles in Oregon.
6. Tim Timmer: Accountant person for CCHC.
7. Jola Hawkins: Receptionist, runs the desk, puts the data in the computer for new clients
8. Keely Jefferies: (No photo) FSS and Home TBRA for Oregon. Also does Home Buyer Voucher Program,
9. Joe Abbott: Property Management person for MCHA/CCHC properties.
11. Nick Haworth: Housing Inspector.

COMMENTS, QUESTIONS AND ANSWER, DISCUSSION

Ruby explained that resources for Section 8 assistance are very limited. The Section 8 program is helping 13% fewer families this year compared to last year due to limits of funding.

Ruby explained that she wanted to make sure that Section 8 participants understand the rules so they do not lose their assistance. For example, assistance may be terminated:

1. Failure to get approval for an extended absence from their home. more than 30 days) and fails to get provide prior notice. If residents are going to be away from their rental unit for more than 30 days they need

approval. Approval will not be unreasonably withheld for emergencies such as hospitalization.)

2. Missing a scheduled appointment
3. Failure to provide required information and turn in all requested forms or in a timely fashion.
4. Failure to allow their rental unit to be inspected
5. Changes in income, legal status or the number of persons living in the home.

Frances Brown asked if an elderly couple could get a 2 bedroom Voucher. Ruby explained that under the occupancy policy a married couple would be eligible for one bedroom. Tenants may request a 2 Bedroom if it is necessary due to a disability. Generally a married couple can share a bedroom even if they need two separate beds. It is important with diminishing resources that we conserve to try to help as many families as possible.

A question was brought up about the use of the Section 8 Voucher for Home Ownership. Ruby explained that a participant may elect to use their voucher for home ownership – the biggest challenge is finding a home to purchase whereby the mortgage payment is within the payment standard. Participants must have been on the Section 8 program for a year and meet all other qualifications for the program.

Ruby provided information on the HOME program for both Oregon and Washington , the Oregon HOME has established priorities based on community input for: survivors of domestic violence, persons with serious mental health , and homeless youth working with community partners to stabilize and become indepprovide stable housing.

HOME program's are state based and Section 8 is a Federal based program

FSS program: Encouraging people to get a job and earn what's called escrow and become self sufficient. After graduating and completing their goals, participants may use the escrow account for a variety of purposes such as a down payment on a home purchase, to start a business to send children to college.

VIDA: This is a savings based program that matches 3-1, the money saved can be used to go to school, a down payment, open a business....

Home repair program: helps home owners with home repairs.

Lonnie DeCourcy asked how we help persons with mental health and single seniors; he doesn't think there is enough help in our area

Ruby explained that 60% of assistance is going to seniors & disabled. Through our affiliated partner, Columbia Cascade Housing Corp., we have developed units to meet the special needs of seniors including West Park Orchards (The Dalles), Mosier Creek Terrace (Mosier), Hamilton Park (N. Bonneville) Sagewind (Moro), Rock Cove (Stevenson) and White Salmon Seniors (White Salmon)

Lonnie asked why Housing was not getting more money.

Ruby: HUD housing is not an entitlement program; all HUD programs are considered discretionary. Lonnie asked if there were ways to get involved and let Congress know that funding for housing is important. Ruby explained that the Housing Authorities belong to the National Association of Housing and provide information to our congressional representatives on the need for housing. There are opportunities for residents to get involved. Angela Brokaw indicated an interest in being considered for the Resident member of the Columbia Gorge Housing Authority board.

Respectfully Submitted:

Tammy Henderson

There being no further questions, The meeting was closed at 1:05 p.m.

EXHIBIT "C" VAWA POLICY\

**MID-COLUMBIA- COLUMBIA GORGE HOUSING AUTHORITY
VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY**

I. Purpose and Applicability

The purpose of this policy (herein called “Policy”) is to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L.109-162) and more generally to set forth Mid Columbia/Columbia Gorge Housing Authority, hereinafter referred to as “MCHA” policies and procedures regarding domestic violence, dating violence, and stalking, as hereinafter defined. This Policy shall be applicable to the administration by MCHA of all federally subsidized Section 8 Housing Choice Vouchers under the United States Housing Act of 1937 (42 U.S.C. §1437 *et seq.*). Notwithstanding its title, this policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

II. Goals and Objectives

This Policy has the following principal goals and objectives:

- A. Maintaining compliance with all applicable legal requirements imposed by VAWA;
- B. Ensuring the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by MCHA;
- C. Providing and maintaining housing opportunities for victims of domestic violence dating, violence, or stalking;
- D. Creating and maintaining collaborative arrangements between MCHA, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence and stalking, who are assisted by MCHA; and
- E. Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by MCHA.

III. Other MCHA Policies and Procedures

This Policy shall be referenced in and attached to Mid Columbia/Columbia Gorge Housing Authority Five-Year Public Housing Agency Plan and shall be incorporated in and made a part of its Section 8 Administrative Plan. To the extent any provision of this policy shall vary or contradict any previously adopted policy or procedure of MCHA, the provisions of this Policy shall prevail.

IV. Definitions

As used in this Policy:

- A. *Domestic Violence* – The term ‘domestic violence’ includes felony or misdemeanor, crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.”
- B. *Dating Violence* – means violence committed by a person—

- (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship.
 - (ii) The type of relationship.
 - (iii) The frequency of interaction between the persons involved in the relationship.
- C. *Stalking* – means –
- (A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; and (ii) to place under surveillance with the intent to kill, injure, harass or intimidate another person; and
 - (B) in the course of, or as a result of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to –
 - (i) that person;
 - (ii) a member of the immediate family of that person; or
 - (iii) the spouse or intimate partner of that person;
- D. *Immediate Family Member* - means, with respect to a person –
- (A) a spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in loco parentis; or
 - (B) any other person living in the household of that person and related to that person by blood or marriage.
- E. *Perpetrator* – means person who commits an act of domestic violence, dating violence or stalking against a victim.

V. Admissions and Screening

- A. *Non-Denial of Assistance*. MCHA will not deny admission to public housing or to the Section 8 rental assistance program to any person because that person is or has been a victim of domestic violence, dating violence, or stalking, provided that such person is otherwise qualified for such admission.
- B. *Mitigation of Disqualifying Information*. When so requested in writing by an applicant for assistance whose history includes incidents in which the applicant was a victim of domestic violence, MCHA, may but shall not be obligated to, take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling. If requested by an applicant to take such mitigating information into account, MCHA shall be entitled to conduct such inquiries as are reasonably necessary to verify the claimed history of domestic violence and its probable relevance to the potentially disqualifying information. MCHA will not disregard or mitigate potentially disqualifying information if the applicant household includes a perpetrator of a previous incident or incidents of domestic violence.

VI. Termination of Tenancy or Assistance

- A. *VAWA Protections*. Under VAWA, public housing residents and persons assisted under the Section 8 rental assistance program have the following specific protections, which will be observed by MCHA:

1. An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be considered to be a “serious or repeated” violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.
 2. In addition to the foregoing, tenancy or assistance will not be terminated by MCHA as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence or stalking engaged in by a member of the assisted household, a guest or another person under the tenant’s control, and the tenant or an immediate family member is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:
 - (a) Nothing contained in this paragraph shall limit any otherwise available authority of MCHA or a Section 8 owner or manager to terminate tenancy, evict, or to terminate assistance, as the case may be, for any violation of a lease or program requirement not premised on the act or acts of domestic violence, dating violence, or stalking in question against the tenant or a member of the tenant’s household. However, in taking any such action, neither MCHA nor a Section 8 manager or owner may apply a more demanding standard to the victim of domestic violence dating violence or stalking than that applied to other tenants.
 - (b) Nothing contained in this paragraph shall be construed to limit the authority of MCHA or a Section 8 owner or manager to evict or terminate from assistance any tenant or lawful applicant if the owner, manager or MCHA, as the case may be, can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance.
- B. *Removal of Perpetrator.* Further, notwithstanding anything in paragraph VI.A.2. or Federal, State or local law to the contrary, MCHA or a Section 8 owner or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against family members or others. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or a lawful occupant. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by GHA. Leases used for all public housing operated by MCHA and, at the option of Section 8 owners or managers, leases for dwelling units occupied by families assisted with Section 8 rental assistance administered by MCHA, shall contain provisions setting forth the substance of this paragraph.

VII. Verification of Domestic Violence, Dating Violence or Stalking

- A. *Requirement for Verification.* The law allows, but does not require, MCHA or a section 8 owner or manager to verify that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking claimed by a tenant or

other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. Subject only to waiver as provided in paragraph VII. C., MCHA shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by MCHA. Section 8 owners or managers receiving rental assistance administered by MCHA may elect to require verification, or not to require it as permitted under applicable law. Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence or stalking may be accomplished in one of the following three ways:

1. *HUD-approved form* - by providing to MCHA or to the requesting Section 8 owner or manager a written certification, on a form approved by the U.S. Department of Housing and Urban Development (HUD), that the individual is a victim of domestic violence, dating violence or stalking that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator.
 2. *Other documentation* - by providing to MCHA or to the requesting Section 8 owner or manager documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.
 3. *Police or court record* – by providing to MCHA or to the requesting Section 8 owner or manager a Federal, State, tribal, territorial, or local police or court record describing the incident or incidents in question.
- B. *Time allowed to provide verification/ failure to provide.* An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by MCHA, or a Section 8 owner or manager to provide verification, must provide such verification within 14 business days (*i.e.*, 14 calendar days, excluding Saturdays, Sundays, and federally-recognized holidays) after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action.
- C. *Waiver of verification requirement.* The Executive Director of MCHA, or a Section 8 owner or manager, may, with respect to any specific case, waive the above- stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver may be granted in the sole discretion of the Executive Director, owner or manager. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

VIII. Confidentiality

- A. *Right of confidentiality.* All information (including the fact that an individual is a victim of domestic violence, dating violence or stalking) provided to MCHA or to a Section 8 owner or manager in connection with a verification required under section VII of this policy or provided in lieu of such verification where a waiver of verification is granted, shall be retained by the receiving party in confidence and shall neither be entered in any shared database nor provided to any related entity, except where disclosure is:
 1. requested or consented to by the individual in writing, or
 2. required for use in a public housing eviction proceeding or in connection with termination of Section 8 assistance, as permitted in VAWA, or
 3. otherwise required by applicable law.
- B. *Notification of rights.* All tenants of public housing and tenants participating in the Section 8 rental assistance program administered by MCHA shall be notified in writing concerning their right to confidentiality and the limits on such rights to confidentiality.
- C. *Security.* All information pertaining to the fact that an individual is a victim of domestic violence, dating violence or stalking shall be maintained separately and securely by the Resident Services Department unless such information is subject to the disclosure exceptions noted in this section.

IX. Transfer to New Residence

- A. *Application for transfer.* In situations that involve significant risk of violent harm to an individual as a result of previous incidents or threats of domestic violence, dating violence, or stalking, MCHA will, if an approved unit size is available at a location that may reduce the risk of harm, approve transfer by a public housing or Section 8 tenant to a different unit in order to reduce the level of risk to the individual. A tenant who requests transfer must attest in such application that the requested transfer is necessary to protect the health or safety of the tenant or another member of the household who is or was the victim of domestic violence dating violence or stalking and who reasonably believes that the tenant or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.
- B. *Action on applications.* MCHA will act upon such an application promptly.
- C. *No right to transfer.* MCHA will make every effort to accommodate requests for transfer when suitable alternative vacant units are available and the circumstances warrant such action. However, except with respect to portability of Section 8 assistance as provided in paragraph IX. E. below the decision to grant or refuse to grant a transfer shall lie within the sole discretion of GHA, and this policy does not create any right on the part of any applicant to be granted a transfer.
- D. *Family rent obligations.* If a family occupying MCHA public housing moves before the expiration of the lease term in order to protect the health or safety of a household member, the family will remain liable for the rent during the remainder of the lease term unless released by MCHA. In cases where MCHA determines that the family's decision to move was reasonable under the circumstances, MCHA may wholly or partially waive rent payments and any rent owed shall be reduced by the amounts of

rent collected for the remaining lease term from a tenant subsequently occupying the unit.

- E. *Portability*. Notwithstanding the foregoing, a Section 8-assisted tenant will not be denied portability to a unit located in another jurisdiction (notwithstanding the term of the tenant's existing lease has not expired, or the family has not occupied the unit for 12 months) so long as the tenant has complied with all other requirements of the Section 8 program and has moved from the unit in order to protect a health or safety of an individual member of the household who is or has been the victim of domestic violence dating violence or stalking and who reasonably believes that the tenant or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.

X. Court Orders/Family Break-up

- A. *Court orders*. It is MCHA's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by MCHA and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.
- B. *Family break-up*. Other MCHA policies regarding family break-up are contained in MCHA's Public Housing Admissions and Continuing Occupancy Plan (ACOP) and its Section 8 Administrative Plan.

XI. Relationships with Service Providers

It is the policy of MCHA to cooperate with organizations and entities, both private and governmental, which provide shelter and/or services to victims of domestic violence. If MCHA staff becomes aware that an individual assisted by MCHA is a victim of domestic violence, dating violence or stalking, MCHA will refer the victim to such providers of shelter or services as appropriate. Notwithstanding the foregoing, this Policy does not create any legal obligation requiring MCHA either to maintain a relationship with any particular provider of shelter or services to victims or domestic violence or to make a referral in any particular case. MCHA's annual public housing agency plan shall describe providers of shelter or services to victims of domestic violence with which MCHA has referral or other cooperative relationships.

XII. Notification

MCHA shall provide written notification to applicants, tenants, and Section 8 owners and managers, concerning the rights and obligations created under VAWA relating to confidentiality, denial of assistance and, termination of tenancy or assistance at time of initial lease-up and at each annual recertification. The full policy and required forms will also be made available on the MCHA's website www.mid-columbiahousingauthority.org

XIII. Relationship with Other Applicable Laws

Neither VAWA nor this Policy implementing it shall preempt or supersede any provision of Federal, State or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence or stalking.

XIV. Amendment

This policy may be amended from time to time by MCHA as approved by the MCHA Board of Commissioners. This policy was adopted by the MCHA Board of Commissioners at their February 14, 2007 Regular Meeting.

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 thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

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.