

AFFH FACT SHEET:

HOW PROGRAM PARTICIPANTS CAN COLLABORATE ON THEIR AFH SUBMISSIONS

HUD encourages program participants to collaborate between and among Public housing agencies (PHAs), local governments, States, and Insular Areas to conduct and submit a single Assessment of Fair Housing (AFH), through either a joint or regional AFH. See 24 CFR §§ 5.152 and 5.156.

WHY COLLABORATE?

Not only do many fair housing issues cross jurisdictional boundaries, but all program participants will be required to conduct a regional analysis whether or not they choose to work with regional partners. As such, there may be resource savings and less duplication of effort by working with partners. Working regionally may help program participants ensure that their goals are consistent, collaborative, and innovative, thereby making their goals more likely to be effective.

TYPES OF COLLABORATION

Collaborating program participants need not be located in contiguous jurisdictions and may cross State boundaries, provided that the collaborating program participants are located within the same Core Based Statistical Area (CBSA), as defined by the United States Office of Management and Budget (OMB), at the time of submission of the AFH. If program participants are either not located in the same CBSA or not located in the same State, they must submit a written request for HUD's approval of their collaboration on a joint or regional AFH. Under any circumstance, collaborating program participants must designate, through express written consent, one participant as the lead entity to oversee the joint or regional AFH on behalf of all collaborating program participants.

JOINT PARTICIPANTS: Refers to two or more program participants conducting and submitting a single AFH (a joint AFH). Joint participants may include local jurisdictions, States, Insular Areas, or PHAs.

REGIONALLY COLLABORATING PARTICIPANTS: Refers to joint participants, at least two of which are Consolidated Plan program participants, conducting and submitting a single AFH (regional AFH).

OPTIONS FOR COLLABORATION

CONSOLIDATED PLAN PROGRAM PARTICIPANTS

- Regionally complete and submit an AFH with another jurisdiction (may include PHAs);
- Jointly complete and submit an AFH with another jurisdiction or with a local PHA; or
- Complete and submit an AFH individually.

PUBLIC HOUSING AUTHORITIES

- Jointly or regionally complete and submit an AFH with a local jurisdiction or State entity;
- Jointly complete and submit the AFH with another PHA; or
- Complete and submit an AFH individually

IDENTIFYING A LEAD ENTITY

Collaborating program participants must designate, through express written consent, one participant as the lead entity to oversee the submission of the joint or regional AFH on behalf of all collaborating program participants. Program participants that intend to collaborate must notify their HUD field office representative and provide a copy of the collaboration agreement. A variety of regional institutions may be involved in the AFH planning process. However, the lead entity for a joint or regional AFH must be a designated program participant that is responsible for overseeing the submission of the AFH on behalf of all collaborating program participants.

COORDINATING SUBMISSION DEADLINES

To the extent practicable, in order to coordinate planning process and submission dates, all collaborating program participants must be on the same program year and/or fiscal year (as applicable) before submission of the joint AFH or regional AFH. HUD may approve a change in program or fiscal year to facilitate a regional or joint AFH. See 24 CFR § 5.156.

- A Consolidated Plan program participant may change its Consolidated Plan program participant program year start dates by notifying HUD at least two months before the date the program year would have ended if it had not been lengthened or at least two months before the end of a proposed shortened program year, as described in if necessary, are described in 24 CFR § 91.15. Program participants may also change the year that the housing, and homeless needs assessment, market analysis, and strategic plan must be submitted if agreed upon by HUD and the jurisdiction in order to coordinate with time periods used for other plans. See 24 CFR § 91.15.
- The applicable procedures for changing PHA fiscal year beginning dates, if necessary, are described in 24 CFR part 903.
- If alignment of a program year or fiscal year is not practicable, the submission deadline for a joint AFH or regional AFH must be based on the designated lead entity's program year start date or fiscal year beginning date (as applicable), as provided in § 5.160(c).
- Within 12 months after the date of AFH acceptance, each collaborating program participant that has a program year start date, or fiscal year beginning date, earlier than the designated lead entity must make appropriate revisions to its full Consolidated Plan (as described in 24 CFR § 91.15(b)(2) of this chapter), or PHA Plan and any plan incorporated therein, to incorporate strategies and proposed actions consistent with the fair housing goals, issues, and other elements identified in the joint AFH or regional AFH.

AFH SUBMISSION REQUIREMENTS

When submitting a joint or regional AFH, collaborating program participants may divide work as they choose, but all program participants are accountable for the analysis and any joint goals and priorities, and each collaborating program participant must sign the AFH submitted to HUD. The authorized representative of each program participant must sign and date the certification. Collaborating program participants are also accountable for their individual analysis, goals, and priorities to be included in the collaborative AFH. In identifying contributing factors and setting priorities and goals, these program participants can address fair housing issues that transcend jurisdiction lines, but must also conduct an analysis specific to their own geographic area. The deadline for submission for collaborating program participants is determined according to the lead entity's schedule.