Streamlined Annual PHA Plan *(Small PHAs)*	**U.S. Department of Housing and Urban Development Office of Public and Indian Housing**	**OMB No. 2577-0226 Expires: 02/29/2016**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, HCV-Only PHA, or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Ann Arbor Housing Commission **PHA Code**: MI064
PHA Type: ☑ Small ☐ High Performer
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/01/2019
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 0 **Number of Housing Choice Vouchers (HCVs)** 1967
Total Combined 1967
PHA Plan Submission Type: ☑ Annual Submission ☐ Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

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

B.	**Annual Plan Elements Submitted with 5-Year PHA Plans.** Required elements for all PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a PHA is not submitting its 5-Year Plan. See Section C for required elements in all other years (Years 1-4).
B.1	**Revision of PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA since its last **Five-Year PHA Plan** submission? Y N ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs. ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☒ ☐ Financial Resources. ☐ ☒ Rent Determination. ☐ ☒ Homeownership Programs. ☐ ☒ Substantial Deviation. ☐ ☒ Significant Amendment/Modification (b) The PHA must submit its Deconcentration Policy for Field Office Review. (c) If the PHA answered yes for any element, describe the revisions for each element below: please see attached
B.2	**New Activities** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☐ ☒ Hope VI or Choice Neighborhoods. ☐ ☒ Mixed Finance Modernization or Development. ☐ ☒ Demolition and/or Disposition. ☐ ☒ Conversion of Public Housing to Tenant Based Assistance. ☐ ☒ Conversion of Public Housing to Project-Based Assistance under RAD. ☐ ☒ Project Based Vouchers. ☐ ☒ Units with Approved Vacancies for Modernization. ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. please see attached

C.	**Annual Plan Elements Submitted All Other Years (Years 1-4).** Required elements for all other fiscal years. This section does not need to be completed in years when a PHA is submitting its 5-Year PHA Plan.
C.1.	**New Activities** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☐ ☑ Hope VI or Choice Neighborhoods. ☐ ☑ Mixed Finance Modernization or Development. ☐ ☑ Demolition and/or Disposition. ☐ ☑ Conversion of Public Housing to Tenant-Based Assistance. ☐ ☑ Project Based Vouchers. ☐ ☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. (c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan. (d) The PHA must submit its Deconcentration Policy for Field Office Review. Please see attached
C.2	**Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan** Form 50077-SM, *Certification of Compliance with PHA Plans and Related Regulations,* including Item 5 must be submitted by the PHA as an electronic attachment to the PHA Plan. Item 5 requires certification on whether plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public.
D	**Other Document or Certification Requirements for Annual Plan Submissions.** Required in all submission years.
D.1	**Civil Rights Certification.** Form 50077-SM-HP, *Certification of Compliance with PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
D.2	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the PHA Plan? Y N ☑ ☐ If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. please see attached. Meeting held January 24, 2018
D.3	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
E	**Statement of Capital Improvements**. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
E.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. See HUD approved HUD-50075.2 attached (previously approved 3.11.2016)

Instructions for Preparation of Form HUD-50075-SM
Annual Plan for Small and High Performing PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Annual Plan. PHAs must complete this section during years where the 5-Year Plan is also due. (24 CFR §903.12)

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

☑ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(1) and 24 CFR §903.12(b). 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. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(2)(ii) and 24 CFR §903.12(b).

☑ **Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions**. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

☑ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c)

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)

☐ **Homeownership Programs**. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii)

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods. 1)** A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Mixed Finance Modernization or Development. 1)** A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including name, 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. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. 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. (24 CFR §903.7(h))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

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

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B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

C. Annual Plan. PHAs must complete this section during years where the 5-Year Plan is not due. (24 CFR §903.12)

C.1 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Mixed Finance Modernization or Development. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. 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. (24 CFR §903.7(h))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

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

C.2 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing form HUD-50077 SM-HP.

D. Annual Plan. PHAs must complete this section in all years.

D.1 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the 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. (24 CFR §903.7(o))

D.2 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

D.3 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

E. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

E.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

DRAFT

Annual Plan Attachment

Section B.1 Annual Plan Element Proposed Changes FY20

Statement of Housing Needs and Strategy for Addressing Housing Needs.
The AAHC currently has the following preferences persons with a disability, residential, and homeless. About 50% of the AAHC's voucher tenants are non-elderly disabled households. AAHC opened the HCV Waiting List for one week, on November 12, 2018; we received over 4,300 applications. Below are the demographics:

White	845
Black	3093
Asian	23
American Indian	8
Pacific Islander	16
Multiple Race	316
No Identification	2
Hispanic	137
On-Hispanic	4166
Female	3375
Male	928
Average Annual Income	$10,948
Average Household Size	2 Persons
Near Elderly (Age 55-60)	602
Elderly (Age 62 and older)	187
Disabled	1532
Homeless	1683
Non-Elderly Disabled (Age 18-61)	1369

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

PHA Policy

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The PHA will not verify any information provided on the preliminary application.

If an application is incomplete, the PHA will not notify the family of the additional information required and the application will be denied. Applicants may correct any information during the open application period. Once the waiting list is closed changes may not be made during the period the PHA is determining the family's placement on the waiting list.

The PHA will only accept one application per family. A family may not place an application for multiple adult members in the household, unless the member will be treated as an individual family.

For example, a family or household with two adults must place one application unless each adult is considered a single person household. Therefore, both adults can not be listed as a member of the others household.

The PHA will reject applications where the head of household is different however, the family members are the same or duplicate members. At anytime the PHA determines that an applicant family is placing multiple applications to increase the change of being placed on the waiting list the applicant family will be denied.

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with an assisted family.

Alimony and Child Support

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

PHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, or (2) records show that payment are being made irregularly.

PART II: VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member. Social Security Administration Benefit Printout for verification of legal identity for adults. Hospital Certified Proof of Birth record for verification of legal identity for children.

Separation or Divorce

PHA Policy

The PHA will require the family to provide documentation of the divorce or separation.

If no court document is available to document a separation, an affidavit of separation signed by the applicant or participant, is required to document that a couple is separated.

An affidavit of estrangement, married living apart, signed by the applicant or participant, is required to document that a couple is estranged.

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

PHA Policy

As verification of earned income, the PHA will require the family to provide the two to six most current, consecutive pay stubs.

7-III.B. BUSINESS AND SELF-EMPLOYMENT INCOME

PHA Policy

Business owners and self-employed persons will be required to provide:

All schedules completed for filing federal and local taxes in the preceding year.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

An affidavit of self-employment, signed by the applicant or participant, may be used to document business income and self-employment.

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a business or self employment income. An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

Social Security/SSI Benefits

PHA Policy
Each year during the month of October, SSA announces the COLA by which Federal SS and SSI benefits are adjusted to reflect the increase, if any, in the cost of living. The Federal COLA does **not** apply to State-paid disability benefits.

Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations (in accordance with PHA-established policy) of family income which have **not** yet been completed **and** will be effective January 1st or later of the upcoming year.

Example: Bob Jones currently receives $500 a month (SS benefit). You are currently working on his reexam (in November 2011) which is effective 02/01/2012. The PHA must determine annual SS income as follows:

- Current benefit amount: $500 X 3.6% [or 0.036] (COLA rate) = **$18.00 COLA**
- New gross SS benefit effective 01/01/2012 = **$518.00** ($500 current benefit +$18 COLA)
- Annual income effective 02/01/2012: $518 X 12 = **$6,216.00**.

1. Use the benefit information reported in EIV that does not include the COLA as third party verification as long as the tenant confirms that the income data in EIV is what he/she is receiving;
2. Use the SSA benefit, award letter or Proof of Income Letter provided by the tenant that includes the COLA adjustment if the date of the letter is within 120 days from the date of receipt by the owner;
3. Determine the tenant's income by applying the COLA increase percentage to the current verified benefit amount and document the tenant file with how the tenant's income was determined; or
4. The PHA may use Social Security Administration News Release or any HUD approved forum such as NanMcKay PIH Alerts to document the tenant file with how the tenant's income was determimed.
5. All recertifications effective after January 1st **must** reflect the SSA benefit that includes the COLA.

7-III.D. ALIMONY OR CHILD SUPPORT

PHA Policy

The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it ***receives irregular or no payments***, in addition to the verification process listed above, the PHA will refer to Chapter **6-I.K.** Alimony and Child support.

If there was a significant change in disbursement during the 12 months reported, the PHA must determine if a different calculation should be used. If the PHA uses a calculation other than the last 12 months disbursement total, an explanation must be noted in the applicant/participant file.

11-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b)]

PHA Policy

Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations (in accordance with PHA-established policy) of family income which have not yet been completed and will be effective January 1st or later of the upcoming year **[PIH Notice 2018-24]**. See Chapter 7-III.C., for verification methods.

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Interim reexaminations can be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.

PHA-Initiated Interim Reexaminations

PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.

PHA Policy

The PHA will conduct interim reexaminations to account for the following that occur between annual re-examinations:

- Any decreases in income, or
- Any new sources of income or increases in a current source of income $200 or more per month; and
- All changes in household composition
- For families receiving the Earned Income Disallowance (EID), PHA will conduct an interim reexamination at the start and conclusion of the 24-month eligibility period.
- If the family reports zero income, the PHA will follow the zero income check back procedures outlined in Chapter 7. The PHA will perform an interim re-exam if it is determined the family has income.

If at the time of the annual reexamination it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.

If the PHA determines it cannot readily anticipate income based on current circumstances (seasonal employment, unstable working hours, other reasons determined by the PHA.) and elects to review and analyze historical data for patterns of employment, paid benefits or receipt of other sources of income in order to establish annual income, the PHA may elect, in its sole discretion, to only process changes when a participant reports a new source of income or a permanent loss of previously reported income. The PHA's justification for this decision is that fluctuations in income sources have already been taken into consideration when establishing the annual income based on historical data. The participant is still required to report all changes in income in order for the PHA to determine what action, if any, is necessary to properly calculate the tenant rent.

If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.

- The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.

Financial Resources

2020 Planned Financial Sources and Uses		
Federal Sources:	**Planned (Est.)**	**Planned Uses**
HUD PHA operating subsidy	$5,000	Turnkey III unit Operations
Public Housing Capital Fund CFP501-19 Grant Estimated	$110,000	Central Office Operations
Housing Choice Voucher/VASH/FUP/NED HAP Grants	$13,000,000	HCV and PBV HAP Expenses. including RAD PBV, NED, FUP and VASH
Housing Choice Voucher Admin Fees	$1,300,000	HCV/NED/FUP/VASH/PBV Admin Expenses
Continuum of Care	$670,000	Rent, Administration and Services
Family Self Sufficiency	$140,000	Family Self Sufficiency program
Other (Interest Income, Fraud Recovery)	$60,000	Voucher Programs and Central Office
Non-federal sources (list below)		
Tenant Rent	$3,000	Turnkey III unit Operations
City of Ann Arbor General Fund	$160,000	Voucher Administration and Central Office
Other Revenue	$700,000	Management Fees
Total resources	**$16,148,000**	

Moving To Work – Voucher & Public Housing Program (Proposed)

The AAHC is considering applying to HUD to become a Moving To Work (MTW) agency. Congress has approved expansion of the program to 100 Public Housing Agencies. The following excerpts are copied from HUD's website:

> Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally-designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income

families. MTW gives PHAs exemptions from many existing public housing and voucher rules and more flexibility with how they use their Federal funds. MTW PHAs are expected to use the opportunities presented by MTW to inform HUD about ways to better address local community needs.

What are MTW agencies permitted to do under MTW?

PHAs selected for the demonstration are permitted to seek exemption from many existing Public Housing and Housing Choice Voucher program rules found in the United States Housing Act of 1937 in pursuit of the three MTW statutory objectives:

- Reduce cost and achieve greater costs effectiveness in Federal expenditures;
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

PHAs in the MTW Demonstration also have the flexibility to combine Federal funds from the public housing operating and modernization programs and Housing Choice Voucher program into a "block grant" to help them better meet the purposes of the demonstration and the needs of their communities.

While MTW agencies have considerable flexibility, they must still abide by all other federal rules and regulations, including the Fair Housing Act, the Civil Rights Act, labor standards, environmental rules, procurement guidelines, demolition and disposition procedures and relocation regulations. For all activities that affect their residents' rent payments, PHAs must also conduct an impact analysis that recognizes the unforeseen circumstances that may affect their residents and develop an appropriate hardship policy. These safeguards help minimize any potentially negative impact of MTW on residents and communities.

The AAHC would like feedback from the Resident Advisory Board on the rules and regulations you would like the AAHC to consider changing that would make it easier to participate in our programs. We would like to know which program rules and regulations are the hardest to comply with.

One of the changes we are considering is to provide a flat rent subsidy or a tiered rent subsidy to all eligible participants rather than changing the rent subsidy every time the tenant's income increases and decreases. This would eliminate or greatly reduce interim income certifications because once a tenant is eligible, the rent subsidy would either stay the same until the next annual income certification or require a significant change in income to change the rent subsidy. The AAHC believes this will streamline the process and provide greater incentive for tenants to increase their income.

The AAHC would also like to revise 3rd party verification requirements. Many third party verifications are difficult to secure, particularly from banks and higher education institutions. In addition, the AAHC is considering a change to rent reasonable and payment standard requirements due to the high cost of housing in Washtenaw County, especially in the City of Ann Arbor, Ann Arbor Township, Saline, Chelsea and parts of Pittsfield Township.

Section B.2 and C.1 New Activities

Pending Information

Conversion of Public Housing under the Rental Assistance Demonstration Program:

Section B.5 Progress Report

Please see the 4 goals from FY 15 – FY 19 Plan with a progress report for each goal

1) *Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project*

   The AAHC has been approved by HUD to redevelop all of its public housing to project based vouchers under the RAD program. Phase 1, 2, 3 & 5 are completed. Phase 4 has closed on financing and is under construction.

2) *Develop new affordable housing*
   a. *At existing public housing sites*
   b. *New properties*

   The AAHC received site plan approval for 3 RAD properties to demolish and build new housing. The Phase 3 location at N. Maple added 23 apartments. The Phase 4 location at White/State/Henry will be adding 4 apartments and the Phase 4 location at Lower Platt will add 28 more apartments. When Miller Manor was redeveloped, 3 apartments were added.

3) *Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation.*
   a. *Issue a Request for Proposal for to project-base up to 20% of the AAHC's budget authority in order to de-concentrate poverty and expanding housing and economic opportunities for very low-income and special needs households in the City of Ann Arbor. AAHC projects that we will convert about 200 vouchers to project-based vouchers.*

   The AAHC issued a RFP to project-base vouchers in the City of Ann Arbor and received applications for 218 project- based vouchers and approved 183 units. The AAHC agreed to project base 6 VASH vouchers at Hickory Way and 3 VASH vouchers; this VASH vouchers will be under construction subject to be leased in 2020. The AAHC will be issuing another Project-Based Voucher RFP in 2019 for up to 100 vouchers.

4) *Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.*
   a. *Increase support services for tenants in affordable housing and voucher program*

b. Through community partnerships
c. Additional funding sources

The AAHC partnered with Avalon Housing, Ozone House, and Washtenaw County Community Mental Health to provided housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. The partners applied for funding to house and provide services for 129 households and were awarded $1,690,235 in annually renewable funding for 129 households in FY16. A minimum of 59 of these households will be housed at AAHC properties and Avalon, WCCMH and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor.

The AAHC is partnered with SOS to hire a case manager to help AAHC voucher tenants to help them to maintain their vouchers. The program received funding from Religious Action for Affordable Housing (RAAH) and Coordinated Funding to hire a full-time case manager for a 2-year PILOT program starting in 2016. Funding was renewed for 2018 & 2019 through Coordinated Funding.
During this 2018 fiscal year, SOS received 91 referrals from AAHC. Of the 91 families and/or individuals seventeen (17) were not assisted due to lack of cooperation or the families relocated to another community. Of the 80 families/individuals served seventeen (17) leased up in Ann Arbor, twenty (20) were able to resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. And the remainder were successful in their effort to lease throughout the Washtenaw community. This fiscal year SOS has been 100% successful in assisting with retaining the vouchers for the families/individuals referred to SOS for assistance. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

The AAHC partnered with Avalon Housing & Peace Neighborhood Center to provide on-site services for tenants at West Arbor.

The AAHC is partnering with CAN (Community Action Network) to apply for funding to provide on-site services at the new Lower Platt Community Center.

The AAHC is partnering with Avalon and CAN to apply for funding to provide on-site services at the new White/State/Henry and Platt Road Community Centers.

Family Unification Program (FUP)
The AAHC has partnered with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 35 families for the HCV Family Unification Program.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participates in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

Non-Elderly Disabled Maintstream Voucher

The AAHC is partnering with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. NED HCVs enable non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities. The 11 partner agencies are:

- (AACIL) Ann Arbor Center for Independent Living, a non-profit service provider for persons with disabilities
- (AAHDC) Ann Arbor Housing Development Corporation, a non-profit created to provide financial support and tenant service support to the Ann Arbor Housing Commission
- Avalon Housing, a non-profit permanent supportive housing and service provider for persons who are facing homelessness, have disabilities, or have other special needs.
- (CSS) Catholic Social Services Offender Success Program, a non-profit services provider with a focus on assisting persons coming out of the prison system successfully re-enter society
- (IHN) Interfaith Hospitality Network, a non-profit shelter for families and Rapid Rehousing provider for persons who are facing homelessness, have disabilities, or have other special needs
- (MAP) Michigan Ability Partners, a non-profit permanent supportive housing and service provider for persons who are facing homelessness, have disabilities, or have other special needs
- Salvation Army, a non-profit that provides shelter for families, services for veterans, and is the local Housing Assessment and Resource Agency (HARA) for the Continuum of Care Program in Washtenaw County, which we call Housing Access of Washtenaw County (HAWC)
- (SAWC) Shelter Association of Washtenaw County, a non-profit shelter individuals for persons who are facing homelessness, have disabilities, or have other special needs
- (SOS) SOS Community Services, a non-profit shelter for families and Rapid Rehousing provider for persons who are facing homelessness, have disabilities, or have other special needs
- (WCCMH) Washtenaw County Community Mental Health in partnership with the Washtenaw County Sheriff’s Department institutional settings for persons who are facing homelessness, have disabilities, or have other special needs

- (WCOCED) Washtenaw County Office of Community and Economic Development in partnership with the Washtenaw Housing Alliance who manage the Continuum of Care process

Section D.2 Resident Advisory Board

The Resident Advisory Board (RAB) will met on February 6, 2019 to discuss proposed changes to the Administrative Plan for the Voucher Program. Members who attended the meeting were:

B. Hill, K. Wanza, F. Stephens, L. Ketzner, D. Boer, T. Franklin, R. Barker, C. Carson, K. Mozak-Betts, P. Jackson, D. Boston, S. Ellinger, K. Pitts, A. Ochoa, J. Frazier, F. Powell, J. French, S. McAfee, G. Denney, K. Bingham, O. Payne, and C. Jackson.

1) **RAB input regarding the Moving To Work Program.** There was a lively discussion about the MTW program. The AAHC explained what the program was and asked RAB members to let us know what regulations they would change if they could? A summary of the questions, suggestions and complaints are listed below.

Multiple tenants asked about requiring program participants to participate in community service or similar programs. There was a lot of discussion around support service such as counseling and training to encourage self-sufficiency.

Another common request was to process annual reexamination on a biennial or triennial basis. Tenants commented that social security benefit income is rarely increased and when an increase occurs it's not substantial.

The RAB wanted to learn more about the Family Self-Sufficiency (FSS) and Homeonwership program which the AAHC explained. One RAB member inquired the difference between the FSS and the MTW program, and inquired if FSS would change if MTW was implemented. AAHC explained that it would be beneficial to assure to two programs are corresponding for participants to receive the most benefit.

The RAB had questions about work requirements. The AAHC explained that there are exceptions for households who are elderly and/or disabled.

There was a discussion about providing a basic rent subsidy, regardless of income or a gradually declining fixed rent subsidy, that was based on how long a person was in the program, not based on their income. Although some RAB members could see how this could be an incentive to work and increase their income so that they could be self-sufficient, others were afraid they would lose this rent safety net if their income declined for some reason.

In addition to these specific items regarding Moving the Work, the RAB members were concerned about the federal budget process and funding because there is such a high need for subsidized housing and it keeps getting cut. RAB members also stated that it was very difficult to find housing that is affordable in Ann Arbor.

OTHER RESIDENT INPUT:

CHALLENGED ELEMENTS TO PLAN: