**Annual PHA Plan**  
*(Standard PHAs and Troubled PHAs)*

**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-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA **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 if administering both programs, or PHAS if only administering public housing.
2. **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, 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.

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**A. PHA Information.**

**A.1**  
PHA Name: **Memphis Housing Authority**  
PHA Code: **TN001**  
PHA Type: [ ] Standard PHA [ ] Troubled PHA  
**07/01/2019**  
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  
Number of Public Housing (PH) Units 2569, (23 offline, 4 deprogrammed). Number of Housing Choice Vouchers (HCVs) 6634(Regular), 44(RAD), 128 Mainstream, 492 VASH (Veteran Assisted Supportive Housing), 365(opt-put) 72 Family Unification Program, 292 Foote

<table>
<thead>
<tr>
<th>Homes =8031–2569</th>
<th>Total Combined Units/Vouchers</th>
<th>10,600</th>
</tr>
</thead>
</table>

PHA Plan Submission Type: [ ] Annual Submission [ ] Revised Annual Submission

**Availability of Information.** PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

Information concerning the 2018 Annual and 5-Year Plan is published on the Memphis Housing Authority Website (www.memphisha.org; 700 Adams (1st Floor Human Resources Office), 3030 Poplar (4th Floor) and on site at the offices of each Public Housing Authority and
managed site:

- **TN 1-13 Barry Towers**  
  255 Lauderdale St. (38105)
- **TN 1-14 Venson Center**  
  439 Beale St. (38103)
- **TN 1-18 Jefferson Square**  
  741 Adams Ave. (38105)
- **TN 1-21 Montgomery Plaza**  
  1395 Pennsylvania St. (38106)
- **TN 1-23 Borda Towers**  
  21 Neely St. (38105)
- **TN 1-51 Askew Place**  
  430 S. Lauderdale St. (38126)
- **TN 1-55 Bishop G.E. Patterson Pointe ( Fowler Multi-family)**  
  886 Latham (38126)
- **TN 1-76 Kefauver Terrace**  
  7620 Robinson Cove (38002)

The same documentation is provided to each privately managed site for them to display in the Office.

- **TN 1-43 College Park Senior**  
  838 Walker Ave (38126)
- **TN 1-44 College Park Family I**  
  838 Walker Ave (38126)
- **TN 1-46 College Park Family II**  
  990 College Park Drive (38126)
- **TN 1-47 Uptown Square**  
  252 N. Lauderdale 38105
- **TN 1-48 Greenlaw Apts.**  
  252 N. Lauderdale 38105
- **TN 1-49 Uptown Phase II**  
  990 College Park Drive (38126)
TN 1-50 Metropolitan Place 252 N. Lauderdale 38105
TN 1-53 Crockett Place 2645 Davey Drive (38127)
TN 1-54 Latham Terrace 855 South Fourth St. (38126)
TN 1-56 Magnolia Terrace 669 N. Third (38107)
TN 1-57 University Place Sr. 600 Somerville (38104)
TN 1-58 Uptown Phase III 990 College Park Drive (38126)
TN 1-59 Uptown Phase IV 990 College Park Drive (38126)
TN 1-60 University Place Phase II 1045 E H Crump Blvd (38104)
TN 1-61 Harold Ford Villas 621 Deerskin Dr. (38109)
TN 1-62 Austin Park 4351 LeClaire Dr. (38109)
TN 1-64 University Place Phase III 1045 E H Crump Blvd (38104)
TN 1-65 Legends Park East 198 N. Pauline (38105)
TN 1-66 Lakeview Landing 3915 Dagan Dr. (38109)
TN 1-67 Levi Landing 915 Dagan Dr. (38109)
TN 1-68 Village at Cypresswood 4495 Horn Lake Rd. (38109)
TN 1-69 Lyons-Ridge Sr. Apts. 1633 Pennsylvania (38109)
TN 1-70 Legends Park West 295 West Red Sox Lane (38105)
TN 1-72 Fairway Manor 12 W. Fairway (38109)
TN 1-71 Legends Park North 295 West Red Sox Lane (38105)
TN 1-72 Fairway Manor 12 W. Fairway (38109)
TN 1-73 Cleaborn Pointe Senior 460 South Lauderdale (38126)
TN 1-74 Cleaborn Pointe Phase II 440 South Lauderdale (38126)
TN 1-75 Cleaborn Pointe Phase III 440 South Lauderdale (38126)
TN 1-77 Cleaborn Pointe Phase IV 440 South Lauderdale (38126)

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

<table>
<thead>
<tr>
<th>Participating PHAs</th>
<th>PHA Code</th>
<th>Program(s) in the Consortia</th>
<th>Program(s) not in the Consortia</th>
<th>No. of Units in Each Program</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
<td>PH</td>
</tr>
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</table>

Lead PHA:

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

<table>
<thead>
<tr>
<th>Y</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒</td>
<td>☒</td>
</tr>
</tbody>
</table>

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification
(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

1. Statement of Housing Needs and Strategy for Addressing Housing Needs

Memphis continues to have a lack of affordable housing units needed for people with low and very low incomes to replace those that were taken off the market over the last 5 years through demolition for revitalization of closed for public health and safety issues. Exhibit 2 contains a summary of the affordable housing needs for Memphis and Shelby County. To preserve the current housing stock in the Memphis Housing Authority (MHA) portfolio, a Rental Assistance Demonstration (RAD) application was submitted to the United States Department of Housing and Urban Development (HUD) portfolio was submitted and chart of the units awarded are part of the progress statements for the goals of the Agency. The waitlists for each site are also contained in Exhibit 2.

The City of Memphis identifies and tries to address specific housing issues as part of the Consolidated plan and the Memphis Housing Authority usually aligns its projects to fit the identified needs in it and those of its residents. Last year the cost burden associated with renting or purchasing a home was a concern as there are local codes that specify the number of people allowed to occupy a unit. Code Enforcement along with the Shelby County Health Department have declared apartment complexes and detached housing units as uninhabitable for various violations. Unfortunately many of the structures are demolished. While there are apartment units being built they do not necessarily have the number of bedrooms needed by larger families. Overall the need for two and three bedrooms is very high and the need for units with more bedrooms growing. This last year we have seen families with 5 or more children applying and grandparents assuming responsibility for grandchildren and having to move from high rises or one bedroom units. Currently MHA has only one development that has four and 5 bedroom units. It is rare to have a vacancy at Montgomery Plaza unless it is out of service because of repairs. Askew and Fowler Multi-family also managed by MHA have 4 bedroom units.

The Agency is continuing to build senior and disabled designated housing. The plan is to construct housing at Legends and in South City to address the aging population.

A homeless preference exists as part of the Housing Choice Voucher Program Administrative Plan. MHA is also looking to construct housing that could be used to assist the Coalition for the Homeless Continuum of Care grant.

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

Mindful of the need for participants in the Housing Programs to find areas (neighborhoods and zip codes) that do not have high concentration of poverty, MHA will be utilizing income targeting in order to assist with raising the rents at the different developments. HUD and The Tennessee Housing Development Agency (THDA) have identified zip codes and census tracts for incentives for housing development and job creation. These incentives will be used to assist residents on the path to self-sufficiency and financial stability of MHA. (see Exhibit 3)

3. Financial Resources

Exhibit 4 (Sources to be determined) is a chart that contains the sources and uses of funds that the Memphis Housing Authority projects to receive in 2019-2020 fiscal year. Complete grants, fees for services and the sale of sale of properties are expected to bring in additional revenues. The Community Engagement Director is charged with fundraising to augment the budget not supported by the grants and rents that MHA currently receives.

4. Rent Determination

The calculations to determine rent have not changed and will not, unless the Agency receives mandates from HUD to do so and with MHA Board approval.

5. Operation and Management

Asset Management and Capital Improvements were combined into a single entity to maximize resources to address the physical needs of the properties. MHA will continue to investigate ways to operate more efficiently. To assist the Property Maintenance Check list has been Housing Operations is updating its Manual of Operations to focus upon service delivery for repairs and pest control. Resident and Staff Safety and enforcement of the Lease Agreement are additional areas of focus for the new department. Rent collection and occupancy have improved with additional training of the staff and increased in-house inspections. Staff assignments on the developments currently contain a property manager, assistant property manager, recertification specialist and maintenance staff at (Barry Towers, Paul Borda Towers, Jefferson Square and Dr. R. Q. Venson Center and three properties have a property manager, recertification specialist and maintenance staff assigned (Askew/G. E. Patterson Pointe, Kefauver Terrace and Montgomery Plaza) Social Service Coordinators are shared between Kefauver Terrace and Dr. R. Q. Venson Center). All others have a dedicated Social Service Coordinator.

7. Homeownership Programs

The Memphis Housing Authority Homeownership Program, McKinley Park is located within the South Memphis area immediately south of Askew Place development. The Program was reduced to 23 homes, a reduction of 7 homes from the original plan. The final home was sold in the summer 2018. The MHA plans to partner seek development partnerships to develop the final 7 homes. As necessary, MHA will seek HUD approval to amend the income guidelines for eligible purchasers from 80% to up to 115% AMI.

6. Safety and Crime Prevention

The Agency will continue to seek additional outside funding to implement the recommendations for increased camera surveillance, lighting, monitoring, etc. that were suggested by the Safeways security audit to augment personal and property safety. The sources of funds will include donations and grants (from local, state and federal government). While additional security staff has been hired, Interagency agreements with local law enforcement and security agencies to cover MHA properties (i.e. Memphis Police Services, University of Tennessee Police Department, Shelby County Sheriff Departments, Bartlett Police Department, etc.) Two part-time and one full-time staff positions were added to the in-house Security team. They provide both car and foot patrol on the properties.

The Lease Agreement is being modified to include language required by the Insurance carrier. MHA continues to perform fire drills with both residents as staff. Evacuation routes in cases of emergency are posted in building (in the high rises it is posted on each floor). Training for staff occurs each in areas as required by local, state and federal to minimize loss and liability.

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

Please see Exhibit 3-1
B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

<table>
<thead>
<tr>
<th></th>
<th>Y</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOPE VI or Choice Neighborhoods.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Mixed Finance Modernization or Development.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Demolition and/or Disposition.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Designated Housing for Elderly and/or Disabled Families.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Conversion of Public Housing to Tenant-Based Assistance.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Occupancy by Over-Income Families.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Occupancy by Police Officers.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Non-Smoking Policies.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Project-Based Vouchers.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Units with Approved Vacancies for Modernization.</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

(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.

1. The Agency has issued a Request for Proposal for the services of a Real Estate Agent/Broker to continue the process of disposing of land in its portfolio. Disposition applications of land will be submitted on behalf of the Agency for the sale of excess/surplus land and Non-conforming (unbuildable as per local codes) parcels. MHA has a listing of all of the parcels that it owns in an electronic format and will furnish a copy of the CD upon the request of HUD. The identification of parcels was done to assist the Agency with future development activities. The 2017 & 2018 plans identified parcels that were not fully developed at Legends Park with frontage on Poplar Avenue adjacent to the FedEx Family house. This facility houses families whose children receive services at the Le Bonheur Children’s Medical Center. Negotiations are underway with Le Bonheur to amend the ground lease for the transfer of a 1.88 acre parcel of land immediate east of the current FedEx House for future planned development in support of the hospital’s expansion plan to include medical, administrative and outreach support services. The transfer is anticipated in 2019. MHA plans to issue RFPs in 2019-2020 for development of additional parcels at Legends Park; College Park is now fully owned by the housing authority; G.E. Patterson Pointe/Akew Place; Montgomery Plaza; and potentially the four Senior/Disabled high-rise buildings either separately or as one project. MHA is also exploring the possibility of entering into a ground lease for the owners of the historic Elmwood Cemetery. Previous Annual Plan submissions also spoke of the disposition of Phase IV of University Place and that along with other parcels referenced previously is still under consideration for the annual plan period. An additional RFP will be issued for 2019-2020 to deal with the sale and disposition of excess land in the MHA portfolio and in many cases the land is not tied directly tied to any of the HOPE VI development projects. The MHA continues to assist the City of Memphis with land acquisition needs in designated redevelopment areas as related to development of affordable housing and other public purposes in accordance with an approved redevelopment plan.

2. Twenty-three units have been taken offline for modernization (i.e. Montgomery Plaza, Dr. R. Q. Venson Center and Jefferson Square)

3. The need for additional dedicated housing for Elderly and/or Disabled families in MHA’s jurisdiction has the agency planning to locate a facility on an undeveloped parcel at Legends Park. This is in addition to the housing planned as part of the South City CNI grant.

4. Development activities at Walnut and Tate will increase the number of affordable housing by 26. This is an acquisition and rehabilitation project.

5. Formation of a 501 c 3 will allow the agency to engage in development, property project management activities. It will also allow the agency to apply for grants and other funds that it may not apply for as a 501 c 4. MHA will continue to seek any and all funds using the 501 c 4 designation as well.

6. In order, to fully utilize the Rental Assistance Demonstration (RAD) Program in 2018, MHA will use a multi-positioning approach for the conversion of units within its portfolio to this program. These actions will ensure that the number of affordable units are preserved or increased to meet the housing goals of the Agency. MHA is projecting to convert 2642 in two phases of the RAD Portfolio approved application. Notification was given on 12/6/2018 of a Commitment to enter into Housing Assistance Payments (CHAPs) for the following properties:

<table>
<thead>
<tr>
<th>PIC Development #</th>
<th>Project Name</th>
<th>Number of Converting Units</th>
<th>CHAP Award Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>TN001000002</td>
<td>South City Phase I</td>
<td>44</td>
<td>3/27/2015</td>
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<tr>
<td>TN001000002</td>
<td>South City Phase II</td>
<td>29</td>
<td>2/28/2017</td>
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<td>TN001000013</td>
<td>Barry Towers</td>
<td>197</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000014</td>
<td>Venson Center</td>
<td>215</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000018</td>
<td>Jefferson Square</td>
<td>208</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000021</td>
<td>Montgomery Plaza</td>
<td>100</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000023</td>
<td>Borda Towers</td>
<td>206</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000043</td>
<td>College Park Senior Village</td>
<td>80</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000044</td>
<td>College Park Family I</td>
<td>92</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000046</td>
<td>College Park Family II</td>
<td>154</td>
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<tr>
<td>TN001000047</td>
<td>Uptown Square</td>
<td>76</td>
<td>11/20/2018</td>
</tr>
</tbody>
</table>
In light of the multi-positioning financing needed for the projects' feasibility, modifications in the number units and developments may occur as the chart above only represents 1,916 of the 2,642 units that were a part of the 2018 RAD application. The total number of units attributable to MHA’s portfolio is 2,569. Project-based Vouchers (PBV), Section 18 demolition and disposition activities, Tenant-Based Rental Assistance Vouchers (TBRA), Low Income Housing Tax Credits, bond financing and loans (public and private) will ensure that the affordable housing stock is not only preserved but added to in a market that has seen a decrease of affordable units through neglect and deterioration. Unfortunately, over the years this has led to demolition under local codes that are designed to protect the health and safety of individuals. Replacement housing units generated by the public and private sector have not have not been able to close the gap.

7. Phase I of new construction for the Choice Neighborhood Implementation (CNI) is set for completion in the fall of 2019. Occupancy of the first units should begin in the summer of 2019. Phase I has 114 units. The Phase II closing was August 29, 2018 and construction began in November 2018 and is scheduled to be completed in the first quarter of 2020. Phase II has 134 units. The Agency has an approved CHAP for 73 Project-based units associated with revitalization of Foote Homes in the South City area (see the chart above). Demolition of the west side of the project to grade was completed in November 2018. The Phase III closing is set for the fall of 2019.

8. The Agency is submitting a Section 18 disposition application for three scattered site units (2416 Vandale, 850 Inez, 151W. Pearson) which are currently listed as part of TN 051. The Askew Place site was originally developed and used for a transitional housing program that later reverted back to traditional public housing as the 36 month maximum occupancy limit was not enough time for many of the families to seek and keep employment or to meet the time stay associated with the HUD’s Transitional Housing program.

9. The Agency’s Central Office activities will move into a new facility in the summer/fall of 2019. The shared space will be co-located with the City of Memphis Housing and Community Development and social service providers. Residents will benefit by having these services in the same facility.

10. The HUD winter time compliance of 68 degrees Fahrenheit in an occupied unit will be added to the checklist of habitability. The Agency prior to this mandate already had taken steps to ensure that apartments that faced north/south were to be inspected in cases of extreme cold. (Temperatures of 20 degrees Fahrenheit or below).

11. Memphis Housing Authority received an additional 22 Veterans Affairs Supportive Housing (VASH) vouchers in 2018 bringing the total to 492. Meetings with VA staff and the Community Alliance for Homeless have occurred so that once housed the Veterans support systems will allow them to continue to be housed. Working with the VA’s social service caseworkers to house people prior to his/her discharge from the hospital will also ensure that this mobile population remains housed.

12. MHA continues to seek public/private partnerships to increase the availability of Veteran Housing in Memphis and Shelby County. Memphis and the surrounding area have a large veteran population and many them he aged in place or have returned from recent deployments with special needs (i.e. handicapped housing, assisted living facilities, etc.) Post Traumatic Syndrome has a lot of the Veterans not easily housed for a variety of reasons. Skilled nursing facilities for vets are in great demand as the Korean and Viet Nam veterans are in 60-80 year age range as well World War II. Some cities are building housing for veterans only and their families and have supportive services on site, MHA is looking at these and other models to better serve this population.

13. An award of 99 Mainstream Vouchers was also given to MHA in 2018, these vouchers s to assist non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless. The Housing Choice Administrative Plan was amended in December 13, 2018 by the Board to accept the award and to enable the conditions of the program.

14. Renewal of facilities that have been designated as Elderly and/or Disabled will be renewed this year (2019). The ones that are classified in this category are for seniors 62 years of age and above: Cleborn Pointe College Park Senior, Fairway Manor Senior, Latham Terrace, Legends Park North Lyon’s Ridge, Magnolia Terrace and University Place. South City has a senior facility planned in a later phase of redevelopment. A later Phase of South City will have this designation. Plans to build additional senior/and or disabled housing at Legends Park are in the works.

15. The potential sale of one or more of MHA’s high rise buildings (Barry Towers, Paul Borda Towers, Dr. R. Q. Venson Center and Jefferson Square) will be done using a Section 18 disposition/demolition application and will require the usage of Tenant-based protection vouchers to relocate tenants as part of the sale.

16. MHA will pursue designation as a “Moving to Work” site. The program allows the agency to incentivize working participants with children or are in self-sufficiency programs, this results in more disposable income for the family and further enhances the goal of self-sufficiency. The MTW program is a tool to move families off public assistance and to keep them off. Education, job skills enhancement, job sustainability and self-employment are just a few of the tools used by the program. The ability to combine federal

<table>
<thead>
<tr>
<th>Tenant Number</th>
<th>Name of Development</th>
<th>Number of Units</th>
<th>Closing Date</th>
</tr>
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<td>Metropolitan Place</td>
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<td>11/20/2018</td>
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<td>TN001000057</td>
<td>University Place Senior</td>
<td>82</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000060</td>
<td>University Place Phase II</td>
<td>44</td>
<td>11/20/2018</td>
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<td>TN001000064</td>
<td>University Place Phase III</td>
<td>26</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000065</td>
<td>Legends Park East</td>
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<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000070</td>
<td>Legends Park West</td>
<td>48</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000071</td>
<td>Legends Park North</td>
<td>44</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000073</td>
<td>Cleaborn Point at Heritage Landing I</td>
<td>44</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000074</td>
<td>Cleaborn Point at Heritage Landing II</td>
<td>36</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000075</td>
<td>Cleaborn Point at Heritage Landing III</td>
<td>32</td>
<td>11/20/2018</td>
</tr>
<tr>
<td>TN001000076</td>
<td>Horton/Kefauver Terrace(Shelby Co)</td>
<td>44</td>
<td>11/20/2018</td>
</tr>
</tbody>
</table>
funds to provide expanded services that includes supportive services would allow MHA to reach the most vulnerable residents within its service area while providing quality housing. Work has already been done by the Agency with the state and local partners.

17. The Contract for the Housing Choice Voucher Program must be re-bid in 2019 as per the Procurement Policy. The contract ends March 31, 2019. Quadell currently has the contract. MHA’s social services still are provided via a contract with Urban Strategies Incorporated. The entity is formally known as USI. The Jobs Plus Program is set to end September 2019 but MHA submitted a contract extension on 01/09/2019 which if approved will extend the contract to March 31, 2021. Both Jobs Plus and the CNI grant target Foote Homes Residents. The sustainability plan included a resource directory that included education and employment connections.

18. As a result of the asbestos and lead paint abatement and fire damage 23 public housing units have been placed in modernization. The units placed in modernization are in need of more rehabilitation than the others being abated. In all cases residents are required to vacate the premises until the premises are cleared by the Shelby County Health Department as to their quality.

19. The Significant Amendment to the Annual and 5-Year Plan is Exhibit 17 and details the information that is required upon the issuance of a CHP for properties that are proposed for a RAD Conversion. The number of units and detailed information concerning the Capital Fund allocation per impacted development.

B.3 Civil Rights Certification.

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Exhibit:

B.4 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y □
N □

(b) If yes, please describe:

Please see Exhibit 15 for the Audit Finding and Corrective Action Plan.

B.5 Progress Report.

Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

1. Expand The Supply Of Assisted Housing.
   a. Mason Village on 4th will receive an additional 19 vouchers for the 77 townhouse development. Priority will be given to Foote Home residents wanting to return to the South City Redevelopment area. Occupancy of the units began December 2018.
   b. HUD’s award of additional Mainstream and VASH vouchers allows the agency the opportunity to house more families in its programs.
   c. MHA will continue to partner with public, private and nonprofit developers to build and renovate new affordable housing units for occupancy by low and very low incomes.

2. Improve The Quality Of Assisted Housing.
   a. MHA is continuing to use the information from recent REAC inspections to prioritize Capital Funds for major system repairs to the units. The concentrated effort to cure deficiencies and become proactive in regard to preventive and routine maintenance raised the scores of all the properties from the 2017 scores. Previously failing properties managed by MHA passed. Major system repairs have begun as all four of the elevators high rises must be replaced. Asbestos removal is another major project that involves trying not to disrupt the lives of residents while removing the material and the controlling dust generated by this process. Air quality monitoring by the Shelby County is one of the protocols of the project.
   b. In accordance with HUD regulations, all public housing facilities are non-smoking, and dedicated smoking areas have been placed at least 25 feet away from residential and administrative buildings. The Lease Agreement and the ACOP all reflect the consequences of violating the policies. Knowledge of the mandate began in 2009 and in 2015 programs for smoking cessation were offered to all residents. The 2016 and 2017 plans had public meetings that gave detailed information to the facilities becoming smoke free. A partnership with the Shelby County Health Department provided the signage for all of the facilities. Each floor of each high rise was given signage.
   c. Each MHA property now has dedicated maintenance personnel. The Work Order Center also validated the need for a specialty crew (Plumbing, heating and air). The crew is given work orders on a daily basis to be completed. More work is completed because this is the area of expertise that the staff has.

3. Increase Assisted Housing Choices.
   a. The Housing Choice Voucher Program continues to have workshops for potential landlords to educate the existing ones on the requirements of the program. Changes in funding or program requirements are transmitted via the Owner/Agent portal and emails.
   b. MHA has is working with both public and private sector housing providers to add additional housing choices for program participants. The Section 8 Homeownership Program and working the nonprofit community have resulted in homeownership opportunities. The RISE Foundation and Community Development Corporations (CDCs) with opportunities for save-up and rental homeownership. RISE works with the FSS Coordinators to provide a financial incentive that provides $2 dollars for everyone a dollar that the resident saves. MHA also tries to ensure that residents are aware of the areas of opportunity in Memphis and Shelby County by providing them with Tennessee Housing Search information and that of the housing built and renovated by the CDC Community. Resident and Managements meetings, mailings flyers and the website are other avenues to ensure that information about housing choices are transmitted to the residents.
   c. Resident and Managements meetings, mailings flyers and the website are other avenues to ensure that information about housing choices are transmitted to the residents.

4. Provide An Improved Living Environment.
   a. MHA spent considerable time and effort on the landscaping of its properties. The curb appeal factor has led to the increased marketability of the properties. By adding additional lighting at the properties (i.e. Bishop G.E. Patterson Pointe) the number of crimes against property has decreased. The agency is continuing to implement changes for the properties that it owns based upon
security audits performed by Safeways a local nonprofit that uses a data driven approach and partnerships to promote crime prevention and resident safety. Environmental and place management, education and training are examples of the tools used by the partners as it tries not improve the quality of life for people on the properties and the communities as a whole.

b. To better serve the residents the Asset Management and Capital Improvements departments were combined into last year. The manual of operations for that department is still in progress as the staff was focused upon the REAC inspections and its new parameters. A property management check list and other items are being solidified in the document.

5. Promote Self-Sufficiency And Asset Development For Individuals And Families

The goals and the progress made towards Self-Sufficiency and Asset Development for 2018 are contained in Exhibit 5. An extension for the Jobs Plus grant was requested January 10, 2019. If approved, the grant will conclude March 31, 2021. The Resident Opportunity Self-Sufficiency (ROSS) grants provide supportive services for residents to achieve educational, job training and placement and other skills necessary to become economically self-sufficient. Human Services activities are contracted through USI (Urban strategies, Inc)


a. Staff is trained on an annual on Fair Housing issues and the correct way to interact with both staff and residents are also informed of the Fair Housing Center that is housed at Memphis Area Legal Services and the Tennessee Human Rights Commission. The MHA Compliance and Training Officer is responsible for the training for the MHA staff and the management staff at the privately-managed where the ACC units are housed.

b. Last year MHA entered into an agreement with the City of Memphis and Shelby County Housing to submit an Affirmatively Furthering Fair Housing Plan for HUD. After the initial work began HUD rescinded the need of PHAs to submit a plan and later only required the City and the County to submit an Analysis of Impediments (AI). MHA continued to work with the other agencies to supply information but withdrew from the financial commitment of the interagency agreement. In essence, it reverted back to the previous planning relationship with the City of Memphis and added more cooperation with the County.

7. Increase availability of affordable housing by awarding Project-Based Vouchers.

a. MHA will continue to work with property developers to add project-based vouchers in the South City area. Also a concerted effort will be made to place PBVs in of opportunities in both Memphis and Shelby using the HUD definition (amen
t to assist with the return of Foote Homes residents to the South City area. There are other projects in MHA’s jurisdiction that the Agency might place project-based vouchers: Mason Village on 4th, Forum Flats and Union Row. All of these projects are set to come online in 2019.

B.6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y ☒ N ☐

(c) 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 Exhibit 12

B.7 Certification by State or Local Officials.

Form HUD 50075-ST, 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.

Please Exhibit 13

B.8 Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y ☒ N ☐ N/A ☐

(b) If yes, please describe:

C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP). Current projects were submitted in 2018 and approved. MHA will submit the latest Capital Plan in EPIC to be completed in 2019-2020.

C.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.

A Copy of the last approved copy of the Capital Plan. Please see Exhibit 9.
Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs

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

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. All PHAs must complete this section.

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.” (24 CFR §903.7)

☐ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. 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. (24 CFR §903.7(a)(1)) 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. (24 CFR §903.7(a)(2)(iii))

☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR §903.2, (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments 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 maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☐ 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))

☐ Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) A description of: 1) Any programs relating to services and amenities
provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(j))

☐ Safety and Crime Prevention. Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 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. (24 CFR §903.7(m)(5))

☐ Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

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

☐ Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. 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 CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; 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.

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

☐ Hope VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD’s website at: 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 disposal; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposal 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))

☐ Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission; and, 5) the number of units affected. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(iii))

☐ 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

☐ Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may
incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A “police officer” means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

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

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

☐ 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).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, 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))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))

B.5 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(c)(1))

B.6 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)

B.7 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

B.8 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” (24 CFR §903.9)

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

C.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.”

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 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.