

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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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, including changes to these policies, 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. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small 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 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, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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	<p>PHA Name: <u>Pickaway Metropolitan Housing Authority</u> PHA Code: <u>OH059</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>108</u> Number of Housing Choice Vouchers (HCVs) <u>661</u> Total Combined <u>769</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>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.</p> <p>The Annual Plan is posted in the main lobby of the Pickaway Metropolitan Housing Authority. It is also posted on our website upon approval and can be found at pickaaymha.org. Copies of the plan have been provided to the Pickaway County Commissioners, the Mayor of our largest municipality which is Circleville, Ohio, the Resident Advisory Board, and the Managers of the PMHA Departments. The public may obtain additional information regarding the information contained in the Plan by contacting the Pickaway MHA office at 740-477-2514 or by email at pmha@pickawaymha.com. Public Records Requests can be directed to Public Records Officer, Tonya VanFossen who can be reached directly at 740-477-2514, extension 317 or at tvanfossen@pickawaymha.com</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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:																	
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B. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual 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.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each element below:

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

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 Rental Assistance or Project-Based Vouchers 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.

See Attached.

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The most recent 5-Year Action Plan covers 2021-2025 and was approved on 7/26/2021. The plan includes eligible CFP projects and is detailed in the Capital Fund 5-Year Action Plan in EPIC approved by the PMHA Board on 7/26/2021.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) 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.</p>
C.2	<p>Certification by State or Local Officials.</p> <p><u>Form HUD-50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing.

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

See Section D1 of the written attachment

Fair Housing Goal:

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Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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. Plan Elements.

B.1 Revision of Existing 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 and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists 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. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a))

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

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))

Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (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))

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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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. 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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development 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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); 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 disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. 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 under the Voluntary or Mandatory Conversion programs. 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 under the Rental Assistance Demonstration (RAD) program. 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 or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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).

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\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

B.5 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\(p\)](#))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on 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](#))

C.2 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.

C.3 Civil Rights Certification/ 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 and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...". Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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. 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.

Public reporting burden for this information collection is estimated to average 7.02 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.

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

There has been relatively no change in the composition of potential applicants or program participants in the Pickaway MHA jurisdiction since completion of the 2024 Annual Plan. This information is provided to document and acknowledge that PMHA is aware of the decrease of voucher utilization in our HCV program and to offer insight into steps taken to address the issue.

Regarding the 108 public housing units, there are currently a total of 1,059 applicants for the one, two, three, and four-bedroom houses and apartments available on this program. The majority of these applicants are for the one-and-three-bedroom units. PMHA maintains a transfer list so that residents relocate to an appropriate bedroom size unit when necessary. In order to determine the proper information is reflected on the waiting list, the agency recently contacted all one-bedroom applicants to verify that their household composition information was current. Any one-bedroom waiting list member who now qualifies for a two-bedroom unit will be relocated to that list with the applicant's permission.

The Housing Choice Voucher program as of 7/11/24 had 431 applicants on the waiting list. This waiting list was opened in August 2023 for a three-day period. Prior to the opening of the wait list, notices were sent to area landlords and various community partners informing them of the opening and encouraging them to notify any of their renters who may experience difficulty in the payment of rent.

The most significant issue facing the voucher program is the availability of rental housing. A tight housing market has also revealed that landlords are renting to private sector renters to avoid housing inspections and paperwork requirements of the HCV program. To address this issue, Pickaway MHA has made changes to several components of the HCV program to better serve and entice landlords, as well as to better serve clients. These changes include:

- PMHA has worked with software provider PHA-Web to restructure its website to provide more in-depth information on the programs offered by the agency, as well as offering both a landlord portal and a tenant portal so that the program requirements by these two groups can be completed on-line whenever possible. This includes posting of vacant units, the ability to obtain their accounting history, completion and submission of all forms on-line, and many other options.
- Landlord incentives are being considered
- PMHA has met with the local community action agency who has received additional funding to assist low-income residents of this area with rental and utility payments.
- PMHA has purchased housing units that are placed on the HCV program.

As a result of the tight housing market, PMHA is also experiencing increased rent requests from landlords that are not supported by rent reasonableness. PMHA uses Nelrod to conduct their rent reasonableness program.

In order to effectively advertise PMHA properties and waiting list opportunities, the agency uses a broad range of methods to reach those who are least likely to apply. Methods include advertisements in the monthly senior center newsletter, the Visitor's Guide of the Pickaway County Visitors' Bureau, the county map distributed by the Visitor's Bureau, the Ohio Health Berger Hospital Patient Guide, numerous special inserts in the local newspaper The Circleville

Herald and on Medi-bags distributed by local pharmacies. Prior to the opening of the HCV wait list, sent notices to several local community partners, and posted on Facebook that was shared by many local partners on their social media accounts. All current landlords were notified that the wait list is opening so they can inform their residents who may not be renters of assisted units and as stated previously, PMHA has created a potential landlord list from the County Auditor's office and notified those landlords as well.

B1b. Deconcentration Policy (No Revision but Policy Provided)

The Deconcentration Policy regarding Poverty and Income Mixing appears in Chapter 4 of the Admissions and Continuing Occupancy Policy of the agency. The ACOP states:

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)}

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirements are referred to as "covered developments" and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition of for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2 (c)(1)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1: The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

NOTE: The Pickaway MHA Policy is that the PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2: The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

NOTE: The Pickaway MHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3: The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which family would be defined as an extremely low-income family (30% of median income).

Step 4: The PHA with covered developments having average incomes outside the EIR must then determine whether these developments are consistent with its local goals and annual plan.

Step 5: Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing. Depending on local circumstances, the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives.

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward an eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2©(4)].

If at a review, the average incomes of all general occupancy developments are within the EIR, the PHA will be in compliance with the deconcentration requirement and no further action is required.

NOTE: For developments outside the EIR the Pickaway MHA will take the following actions to provide for deconcentration of poverty and income mixing: PMHA may, in order to achieve a broad range of income in public housing properties, skip families on the waiting list in order to reach another family in an effort to further the goals of deconcentration.

NOTE: In Chapter 12, regarding transfers of public housing residents, the PMHA policy states, "if subject to deconcentration requirements, the PHA will consider its deconcentration goals when transfer units are offered. When feasible, families about the EIR will be offered a unit in a development that is below the EIR, an vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer."

Assessments are conducted annually.

B.1(a) Financial Resources

The Pickaway Metropolitan Housing Authority lists the following sources of income:

Federal and Federally Related Income

Public Housing Operating Subsidy
Capital Funds
Public Housing Rental Income
HCV Admin Fees
HCV HAP Subsidy
VASH Voucher Admin Fees
VASH Voucher HAP
USDA RD Rental Income
USDA RD Rental Assistance

Management Fees from Multi-Family Housing
Rental Income from Multi-Family Housing
Rental Assistance for Multi-Family Housing
Other Business Activity Rental Income
Other Business Activity Interest Income
Excess funds from Multi-Family Housing
FSS Grant

Notes:

Management Fees and excess funds originate from PMHA Ownership and Management of Pickaway Terrace and Eden Place, and Management Fees originate from PMHA Management of Louise Terrace.

OBA Rent Income originates from Other Business Activity Rent Income which are 8 properties owned by the Agency and currently rented without subsidy. These funds are used to support agency operations such as the maintenance of the properties and bed bug equipment upgrades.

B.1 Substantial Deviation

In considering any significant amendment or modification to the Annual Plan or the Five Year Plan, the PMHA Board and Executive Director will seek the input and recommendations of the Resident Advisory Board, conduct a public hearing, adopt the amendment/modification at a regularly scheduled meeting of the Board of Commissioners of the Agency, and submit the amendment/modification to HUD for approval.

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) rules became a law. The changes impact how PMHA will determine eligibility including income, rent calculations, resident self-certification and interim redeterminations. In September 2023, HUD released a notice, HUD Notice 2023-10, for implementation of the HOTMA rules no later than January 1, 2025.

The implementation date of the HOTMA rules has been delayed until an unknown date in the future, because of a delay in the reporting system Housing Information Portal (HIP) that supports the new rules. However, to be in compliance with the HUD Notice 2023-10, PMHA must update the Administrative Plan and Admissions and Continued Occupancy Policy (ACOP) Plan with the HOTMA regulatory requirements.

PMHA is updating the Administrative and ACOP Plans to be in compliance with the HUD Notice by January 1, 2025, with a start date of the plans including the HOTMA regulations to have an undermined effective date.

B.3 Progress Report

PMHA has assumed ownership of two Multi-Family Housing Properties and the process was started to assume ownership of a third Multi-Family property. The rise in interest rates and inflation has financially no longer made the purchase of the third Multi-Family property a viable option.

Unit occupancy for the Public Housing program and all other properties owned or managed by the agency remains at 98%-100%. The agency continues to struggle with voucher utilization in the HCV program. As described in Section B.1, the agency has taken and will take several measures to continue to promote the program among area landlords.

PMHA continues to represent the needs of our clients through participation in local boards and committees. PMHA has membership on the JFS Planning Committee, the Pickaway County Community Foundation, the local Community Action Agency Board of Commissioners, the Domestic Violence Task Force, the Safety Committee through the Chamber of Commerce, the Senior Center, and the area Drug Prevention Coalition just to name a few.

PMHA continues to administer our VASH Voucher program at near-capacity. The agency also serves as the receiving VASH agency for additional VASH recipients who cannot successfully find housing in their jurisdiction and relocate to Pickaway where landlords are willing to rent to them.

D.1 Affirmatively Furthering Fair Housing

The Pickaway Metropolitan Housing Authority recognizes and appreciates its obligation to affirmatively further fair housing in all of the programs under our responsibility.

Pickaway Metropolitan Housing Authority annually reviews the composition of waiting lists in comparison to the statistical composition of its jurisdiction. These statistics have not changed since the completion of the 2022 Annual Plan. Areas of comparison include race and ethnicity, age, disability, language spoken and housing statistics. This analysis allows us to identify if there are existing impediments that result in lack of accessibility to our programs.

Rental housing in our jurisdiction is available through PMHA, the local Community Action Agency, and approximately 5 LIHTC communities in the area. The CAA, when funding is available, offers emergency services for persons who are homeless, for veterans referred from the VA Service office who are not VASH eligible, and for persons who have specific circumstances that are barriers to employment such as lack of transportation. The CAA is one of our closest community partners. Our agency also works closely with Haven House which is the local women's domestic violence shelter and who also provides housing for the homeless when shelter space permits. PMHA works closely with Southeastern Ohio Legal Services by referring clients and program participants to that agency on a regular basis. Currently, the three agencies are working together on projects to effectively utilize funds received by the CAA for economic relief from unpaid rent, mortgages, utilities, taxes to avoid eviction or foreclosure.

In working closely with these two agencies, we are able to reach and serve members of the population eligible for our programs.

In order to effectively advertise PMHA properties and waiting list opportunities, the agency uses a broad range of methods to reach those who are least likely to apply. As stated previously, we currently advertise in the monthly senior center newsletter, the Visitor's Guide of the Pickaway County Visitor's Bureau, the county map distributed by the Visitor's Bureau, the Ohio Health Berger Hospital Patient Guide, numerous inserts in the local newspaper, and on medibags distributed by local pharmacies (the white bags used to place prescriptions purchased at the pharmacies). As part of the opening of the HCV wait list, HCV staff members distribute over 75 fliers advertising the waiting list in Doctor's offices, grocery stores, gasoline stations and mini marts, laundry mats and pharmacies. These fliers were distributed to all local agencies that serve the same population as Pickaway MHA.

In January of each year, the PMHA Board reorganizes for the coming twelve months. At that reorganization, the Board reviews and adopts the agency mission statement, as well as the statements certifying their commitment to EHO and Civil Rights. Those statements are as follows:

Mission Statement

The Pickaway Metropolitan Housing Authority's (PMHA) Mission is to assist low-and-moderate income persons with safe, decent, and affordable housing opportunities as they strive to achieve self-sufficiency and to improve the quality of their lives. The PMHA is committed to operating in an efficient, ethical, and professional manner and in partnership with clients and community agencies. The agency further strives to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by promoting enforcement and public understanding of federal fair housing policies and laws.

Statement of Equal Housing Opportunity

The Pickaway Metropolitan Housing Authority is committed to providing housing opportunities to person without discrimination on the basis of race, color, religion, sex, national origin, disability and familial status. The Pickaway Metropolitan Housing Authority will attempt to alleviate housing discrimination within our county, to provide fair housing choices for all persons, to provide opportunities for all program eligible persons to reside in any given housing development, and to sustain and promote housing that is accessible to, and usable by persons with disabilities while meeting the requirements of the Fair Housing Act.

Statement of Civil Rights Certification

The Pickaway MHA will carry out the administration of all housing programs to the best of their ability, in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990, and all subsequent regulations associated and adopted related to these Acts.

Additionally, each year the PMHA staff trains on Fair Housing. This training is typically conducted by William Willis of the Willis Law Firm. The next training is scheduled for August 7, 2024, at the Pickaway MHA office. Trainings on Fair Housing are also conducted by Southeastern Ohio Legal Services when they request the opportunity to present to the PMHA staff. This frequently occurs when there has been legislative change to programs such as VAWA

or AFFH. Discussion of Fair Housing regulation is present not only in these trainings, but in every staff meeting and discussion held on general or specific operations involving our clients. PMHA often refers clients to the Legal Services agencies to make sure they are receiving representation in hearings as well as other landlord/tenant issues.

The administrative policies of the agency also address disparate impact in policies addressing applicants and participants of the program. The policies read, "While the regulations state that the PHA must prohibit admission for certain types of criminal activity and give the PHA the option to deny for other types of previous criminal history, more recent HUD rules and OGC guidance must also be taken into consideration when determining whether a particular individual's criminal history merits denial of admission. When considering any denial of admission, PHAs may not use arrest records as the basis for the denial. Further, HUD does not require the adoption of "One Strike" policies and reminds PHAs of their obligation to safeguard the due process rights of applicants and tenants (Notice PIH 2015-19).

HUD's Office of General Counsel issued a memo on April 4, 2016, regarding the application of Fair Housing Act standards to the use of criminal records. This memo states that a PHA violates the Fair Housing Act when their policy or practice has an unjustified discriminatory effect, even when the PHA had no intention to discriminate. Where a policy or practice that restricts admission based on criminal history has a disparate impact on a particular race, national origin, or other protected class, that policy or practice is in violation of the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the PHA, or if that interest could be served by another practice that has a less discriminatory effect (OGS Memo 4/4/16).

PHAs who impose blanket prohibitions on any person with any conviction record, no matter when the conviction occurred, what the underlying conduct entailed, or what the convicted person has done since then will be unable to show that such policy or practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest. Even a PHA with a more tailored policy or practice that excludes individuals with only certain types of convictions must still prove that its policy is necessary. To do this, the PHA must show that its policy accurately distinguishes between criminal conduct that indicates a demonstrable risk to resident safety and property and criminal conduct that does not."