

Annual PHA Plan <i>(Standard PHAs and Troubled 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-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 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, 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	PHA Name: <u>Mankato EDA</u> PHA Code: <u>MN063</u> PHA Type: ☒ Standard PHA ☐ Troubled PHA 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>179</u> Number of Housing Choice Vouchers (HCVs) <u>589</u> Total Combined Units/Vouchers <u>768</u> PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission Availability of Information. 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. 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. The Mankato Economic Development Authority has developed the 2025 Annual Agency Plan and Five Year Plan in compliance with the Quality Housing and Work Responsibly Act of 1998 and the 2024 Public Housing Capital Fund. The plan and capital fund are available for review on the City of Mankato website at www.mankatomn.gov. A copy can also be requested by contacting Nicole Cunningham, Housing Coordinator, at 507-387-8675 or in writing to ncunningham@mankatomn.gov or City of Mankato, PO Box 3368, Mankato, MN 56002-3368. On August 12, 2024, the EDA will set a Public Hearing for the Annual Agency Plan and Capital Fund to be held September 9, 2024, at 6:00 pm. Everyone is invited. ☐ PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <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> <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? Y N <table border="0"> <tr><td>☐</td><td>☒</td><td>Statement of Housing Needs and Strategy for Addressing Housing Needs</td></tr> <tr><td>☐</td><td>☒</td><td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</td></tr> <tr><td>☐</td><td>☒</td><td>Financial Resources.</td></tr> <tr><td>☐</td><td>☒</td><td>Rent Determination.</td></tr> <tr><td>☐</td><td>☒</td><td>Operation and Management.</td></tr> <tr><td>☐</td><td>☒</td><td>Grievance Procedures.</td></tr> <tr><td>☐</td><td>☒</td><td>Homeownership Programs.</td></tr> <tr><td>☐</td><td>☒</td><td>Community Service and Self-Sufficiency Programs.</td></tr> <tr><td>☐</td><td>☒</td><td>Safety and Crime Prevention.</td></tr> <tr><td>☐</td><td>☒</td><td>Pet Policy.</td></tr> <tr><td>☐</td><td>☒</td><td>Asset Management.</td></tr> <tr><td>☐</td><td>☒</td><td>Substantial Deviation.</td></tr> <tr><td>☐</td><td>☒</td><td>Significant Amendment/Modification</td></tr> </table> (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): (c) The PHA must submit its Deconcentration Policy for Field Office review. HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family. Low-income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)]. PHA Policy The PHA will monitor progress in meeting the income targeting requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.	☐	☒	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
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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

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|-------------------------------------|-------------------------------------|--|
| ☐ | ☒ | Hope VI or Choice Neighborhoods. |
| ☐ | ☒ | Mixed Finance Modernization or Development. |
| ☒ | ☐ | Demolition and/or Disposition. |
| ☐ | ☒ | Designated Housing for Elderly and/or Disabled Families. |
| ☐ | ☒ | Conversion of Public Housing to Tenant-Based Assistance. |
| ☒ | ☐ | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. |
| ☐ | ☒ | Occupancy by Over-Income Families. |
| ☐ | ☒ | Occupancy by Police Officers. |
| ☒ | ☐ | Non-Smoking Policies. |
| ☒ | ☐ | 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.

The Mankato EDA estimates annually five to seven Public Housing units will be taken down for modernization. Modernization will occur when the unit is vacant and dependent upon funding availability. This year included: 127 Knollcrest Dr, 605 Harper Street B-2, 125 Grace Court, 1617 Fifth Ave, 617 Elm St, 1621 Fifth Ave, and 116 Haynes Street.

The EDA has approved conversion of its public housing program to Section 8 Project Based Vouchers and staff is working with a consultant to assist in processing the conversion of Public Housing under HUD's Rental Assistance Demonstration (RAD) Program or other alternatives, including Section 18 Disposition and a RAD/Section 18 Blend.

Section 18 Disposition

The EDA will be disposing of 51 public housing units via the Section 18 Disposition Program for Scattered Site Units as outlined in PIH Notice 2021-07. The application will be submitted in 2023 and the units will be converted to Section 8 Project Based Vouchers in 2024.

Rental Assistance Demonstration (RAD):

The Mankato EDA previously amended its annual and/or 5-year PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Mankato EDA will be converting a portion of its public housing portfolio to Section 8 Project Based Vouchers under the guidelines of PIH 2019-19/PIH 2019-13, REV-4, PIH Notice 2021-07, and any successor Notices.

The EDA will pursue the RAD/Section 18 Small PHA Blend for twenty-seven (27) scattered site units and 101 units at Orness Plaza. Once the units are removed from PIC, the EDA will close out of the public housing program.

No change is proposed in the number of units or bedroom distribution.

Project-Based Vouchers

Changes in policy related to eligibility, admission, selection, and occupancy are anticipated to be only those necessary to follow the Housing Choice Voucher, Project Based Voucher, and RAD Project Based Voucher programs, including, but not limited to income guidelines. The Mankato EDA provide preferences for:

- Local Residency preference
- Regional Coordinated Entry preference
- Victims of domestic violence
- Veterans preference
- Special Services Voucher for Mainstream, Foster Youth to Independence, and Stability Vouchers

Additional preferences to be included under the Housing Choice Voucher program are:

- Involuntary displacement due to governmental action, including conversion from public housing to Section 8 via RAD or Section 18, natural disaster, or beyond applicant control.
- Moving on – supportive housing preference

The PHA is not currently under a voluntary compliance agreement, consent order or consent decree of final judicial ruling or administrative ruling or decision.

Resident Rights, Participation, Waiting List and Grievance Procedures:

Upon conversion to Project Based Vouchers the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in **Section 1.6 of H 2019-09/PIH 2019-13, REV-4; and H-2016-17/PIH-2016- 17 (Attachment A)**. These resident

rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the **Mankato EDA** certifies that it is currently compliant with all fair housing and civil rights requirements. RAD was designed by HUD to assist in addressing the capital needs of public housing by providing **Mankato EDA** with access to private sources of capital to repair and preserve its affordable housing assets.

The Mankato EDA does not anticipate any site selection changes or relocation needs because of the RAD and Section 18 conversions and certifies that the RAD and Section 18 conversions comply with all applicable site selection and neighborhood reviews and that all appropriate procedures have been followed as required by Section 5.2 of the RAD Fair Housing, Civic Rights, and Relocation Notice H 2016-17/PIH216-17(HA).

Requirements for RAD Specific Significant Amendment Submissions H-2019-09 PIH 2019-23 (HA), Rental Assistance Demonstration REV-4 – Final Implementation 150 Below, please find specific information related to the Public Housing Development(s) selected for RAD:

Development #1

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type:</u>
Mankato EDA Scattered Site	MN063000001	PBV
<u>Total Units:</u>	<u>Pre-RAD Unit Type:</u>	<u>Post-RAD Unit type:</u>
27	Family-General Occupancy	Family-General Occupancy

Capital Fund allocation of Development: \$432,578 Annual Capital Fund Grant attributable to the Project.

The Mankato EDA acknowledges that current Capital Fund Program Grant Budgets will be reduced because of converting through RAD to the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Mankato EDA may also borrow funds to address their capital needs. The Mankato EDA will also be contributing Operating Reserves and Capital Funds towards the conversion, and/or any Replacement Housing Factor (RHF) Funds towards the conversion.

<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom</u>
1 BR	0	0	0
2 BR	7	7	0
3 BR	15	15	0
4 BR	3	3	0
5 BR	2	2	0

Development #2

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type:</u>
Orness Plaza	MN063000001	PBV
<u>Total Units:</u>	<u>Pre-RAD Unit Type:</u>	<u>Post-RAD Unit type:</u>
101	Family-General Occupancy	Family-General Occupancy

Capital Fund allocation of Development: \$432,578 Annual Capital Fund Grant attributable to the Project.

The Mankato EDA acknowledges that current Capital Fund Program Grant Budgets will be reduced because of converting through RAD to the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Mankato EDA may also borrow funds to address their capital needs. The Mankato EDA will also be contributing Operating Reserves and Capital Funds towards the conversion, and/or any Replacement Housing Factor (RHF) Funds towards the conversion.

<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom</u>
1 BR	98	98	0
2 BR	3	3	0
3 BR	0	0	0
4 BR	0	0	0
5 BR	0	0	0

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B.3	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. Provide safe, decent, and affordable housing for low-income people: - Engaged in the work addressed in our Affordable Housing Action Plan to create new affordable units, preserve existing housing, prevent and end homelessness, and educate the community on resources. The CDBG funding has rehabilitated 8 rental units and 3 single family homes. We have supported the development of 48 new affordable units and 259 market rate units. Provided stable housing to 39 individuals at risk of or homeless in our community. - City/County Ordinances to establish an Affordable Housing Trust Fund dedicating public revenue for affordable housing. Trust funds are a consistent, flexible resource for addressing housing needs in the community. The HTF will provide opportunities to leverage public and private funds and jump start projects that benefit and invest in the community. - The EDA is successfully administering the Public Housing and Housing Choice Voucher programs. The EDA evaluates the availability of additional housing vouchers with the use of current resources. Sinclair Flats, providing 48 affordable units, opened this past year using project-based vouchers. Walnut Towers, providing 86 subsidized units, is under preservation using LIHTCs. Lewis Lofts, providing 64 affordable units, is also under construction. - The Capital Fund Program has been administered to maintain and renovate the public housing units to meet all inspection criteria and received a 98% on the REAC Inspection completed the spring of 2023. Maintain the portfolio appearance consistent with the surrounding neighborhoods. - Vine Street Duplex will be included in project-based conversion along with public housing. - Policies to administer flat rents are following PIH 2014-12. - Assisted 25 families obtain homeownership. Address the needs of the homeless in Blue Earth County - The EDA continues to successfully administer the Continuum of Care program, HUD special programs for VASH and Mainstream, Foster Youth to Independence, and 4 dedicated units for Long Term Homelessness at Breckenridge townhomes. - FYI will provide a community connection to be competitive for Family Unification Program funding as available and meets needs of homeless and at-risk youth in our community. It also provides them with supportive services in partnership with Lutheran Social Services, County Child Protection, and the regional CoC. - Administered Emergency Housing Vouchers using the move-up preference. - Administered Housing Stability vouchers. - Staff continues to work with the existing shelter providers to increase the number of beds in our area, developed bi-weekly case conferencing with shelters and housing providers to house/shelter homeless in our community and those at higher risk for COVID 19. - Staff have participated in the development and ongoing use and assessment of the Coordinated Entry system for our area and participate in monthly case conferencing. - Received CoC funding to provide administrative fees for administering Housing Stability services to those at risk of homelessness and CES Navigation services to those who are homeless. These funds support our local Street Outreach team navigate those who are homeless to community resources and stable housing options. - EDA in partnership with Blue Earth County, Connections Shelter and Partners for Housing hired a developer to submit an application for funding to MN Housing for low-income housing tax credits to develop a permanent supportive housing project with strong community support providing \$2 million in ARP funding, \$100,000 in CDBG funding, land, and 40 project-based vouchers. This project will include a Phase II emergency homeless shelter providing congregate and non-congregate shelter for individuals transitioning into supportive housing once capital funding can be secured. The EDA will be notified in January 2025 if this supportive housing project is awarded LIHTC funding. - The EDA utilizes preferences for Coordinated Entry, Supportive Housing, and Involuntarily displacement due to natural disaster or governmental action, and VAWA outlined in the Administrative Plan and ACOP. These preferences enabled our agency to assist more households being displaced due to the social distancing mandates and those at higher risk for COVID 19. - CDBG Subsistence Payment program was administered to provide emergency rental assistance for renters with past due rent impacted by COVID 19. \$36,569 has been allocated and has served 28 households. - CDBG funds continue to consider proposals from homeless shelters serving low-income homeless households. \$15,000 in CDBG funds were used for rehabilitation Partners for Housing shelters in Mankato. - Through use of coordinated entry system and use of preferences, the EDA has increased housing subsidies serving homelessness by 33% over the past 5 years. - Created a response system to End Veterans Homelessness within our CoC Region. Help move citizens to economic Self-Sufficiency. - Continue to offer Home Stretch homebuyer education and the HCV Homeownership Program. Supports a memorandum of understanding with the SWMNHP as a HUD certified housing counseling agency to provide program participants with housing counseling. - Offer down-payment assistance through the City of Mankato Homeownership revolving loan fund for HCV homebuyers and Minnesota Cities Participation program.
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	- Staff continues to administer the Family Self-Sufficiency program which helps move program participants off of government assistance and promotes asset development. In the past 12 months 47 participants made progress towards achieving their goals. Expand Affordable Housing Opportunities: - Utilize homebuyer gap funding through MN Housing Impact Fund in partnership with SWMHP making available gap financing up to \$20,000 for up to 10 households to achieve homeownership. - Utilize the MCPP program with MN Housing aiding 24 first time homebuyers, step up buyers and fix up loans. - EDA has partnered with the Partnership Community Land Trust administered by the SWMHP to expand the community land trust into Mankato. The CLT will provide homeownership for 3 households purchasing existing homes in the community and 3 households purchasing new construction homes. Next year, Phase III will provide 2 new construction homes and 5 acquisition/rehabilitation homes in the community. - Staff assisted 2 developers made application for Low Income Housing Tax Credit (LIHTC) program, financing needed to preserve and increase affordable housing in Mankato. CDBG funds for site acquisition and Project Based vouchers have been allocated to projects. - CDBG funds will again be used to improve and preserve existing housing stock owned by or rented to low-income citizens. 8 rental units and 3 owner occupied homes were rehabilitated in 2024. - Mankato is receiving 288,957 for 2023 and 2024 in local affordable housing aid from the MN Department of Revenue to create a local Housing Trust fund that will reduce disparities in home ownership, reduce housing cost burden, housing instability, or homelessness. Improve the habitability of homes, create accessible housing, create more energy- or water-efficient homes, and create sensory-accessible homes. Giving us a sustainable way to address affordable housing in our community. These funds will be matched with county aid of \$165,141 in 2023 and 2024 used to leverage additional HTF allocations from MN Housing. - Apply for additional affordable housing as available. Successful Administration of the Community Development Block Grant: In 2024, CDBG funds were spent on owner-occupied and rental housing rehabilitation and abatement of lead-based paint hazards, benefiting 11 low to moderate income households. Housing rehabilitation has been effective in preserving affordable housing stock as well as improving the quality of life for low to moderate income households. CDBG funds were used for a variety of public service activities including subsistence payments to landlords and utility providers for past due rent and utilities, for health care services, nutrition, transportation, chore services for elderly and disabled, education for new Americans and operation costs for homeless day shelter. In 2024 CDBG funds are also being used towards site acquisition costs for two affordable housing projects that will leverage Low Income Housing Tax Credits (Walnut Towers rehabilitation to preserve existing affordable housing and Lewis Lofts construction to add additional affordable housing units). Assist Program Participants who are Victims of Domestic Abuse: - Staff refer victims to law enforcement as well as to services provided by the Committee Against Domestic Abuse (CADA). - Staff terminate housing assistance/lease agreements of the perpetrators of violence. - Staff work with CADA social services staff to provide supportive housing to residents of CADA House. - Utilize preference for VAWA on HCV wait list.
B.4	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. 2023-2027 5 year Action Plan approved by HUD on 1-31/24.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☒ (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.

C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N ☐ ☐ (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.
C.2	Certification by State or Local Officials. Form HUD-50077-SL, <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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <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.
C.4	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. (a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements.
C.5	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:
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH).

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: Created informational opportunities for participants and public.

	<u>Describe fair housing strategies and actions to achieve the goal</u> Conduct initial and annual briefings with families to explain program participation, promote housing of choice, fair housing, housing quality standards and lead paint. Attend affordable housing and community connect fairs and promote fair housing and program participation. Provide informational brochures. Presented information to Youth programs, social worker meetings, County departments, county Homeless Response team, and landlord engagement events.
	Fair Housing Goal: Seek feedback from those with lived experience receiving program assistance. <u>Describe fair housing strategies and actions to achieve the goal</u> Annually hold a resident advisory board of program participants and discuss program participation, review policies and procedures, ensure fair housing, seek input on ways to improve access and participation on affordable housing programs. Listening sessions with those who are homeless in the development of the Mankato Supportive Housing project. The information shared supported the design, location, amenities, and services needs for the project. Continued coordination through the development process will be included. As the community begins Phase II emergency shelter, additional listening session will support this development as well.
	Fair Housing Goal: Ensure equitable access to programs and services. <u>Describe fair housing strategies and actions to achieve the goal</u> The EDA refers participants to the Beyond Backgrounds program for support in securing affordable housing when faced with poor rental history and criminal backgrounds. Partnered for the creation of the Preventing Rental Evictions program (PREP) to provide mediation services for tenants at risk of eviction. The program also analysis rental evictions and plans to create action steps with landlords and tenants based on the data collected. Conducting engagement sessions with landlords to ensure an adequate supply of affordable units will continue to be available. Thes engagement sessions provided feedback from landlords regarding policies and program implementations as well as considered opportunities to incentivize landlords to work with supportive programs and keep rents affordable. Funding for rehabilitation needs of rental units is another priority.

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. (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. All PHAs must complete this section.

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.” (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 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 statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and 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.** 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 (24 CFR §903.7(l)). Provide 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 subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** 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. 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 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:

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 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\(h\)](#))

☐ **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; 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **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\(i\)\(C\)](#))

☐ **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 Rental 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.](#)

☐ **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 and Notice PIH-2017-03](#). ([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 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.

C.5 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. Include dates in the description and most recent revisions of these documents as attachments. 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](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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, in part 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.

Public reporting burden for this information collection is estimated to average 7.52 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.