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-HCV is to be completed annually by HCV-Only PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

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 and 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.

| PHA Name: Metropolitan Council Housing and Redevelopment Authority |
| PHA Code: MN163 |
| PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2024 |
| Number of Housing Choice Vouchers (HCVs): 7257 (including EHV and Mainstream) |
| PHA Plan Submission Type: ☑ Annual Submission |

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

**PHA Consortia.** (Check box if submitting a joint Plan and complete table below)

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

---

Page 1 of 8   form HUD-50075-HCV (03/31/2024)
<table>
<thead>
<tr>
<th>B. Plan Elements.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>B.1 Revision of Existing PHA Plan Elements.</strong></td>
</tr>
<tr>
<td>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</td>
</tr>
<tr>
<td>Y</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>☑</td>
</tr>
<tr>
<td>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</td>
</tr>
<tr>
<td><strong>B.2 New Activities.</strong> – Not Applicable</td>
</tr>
</tbody>
</table>
B.3 Progress Report.

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

**GOAL:** Maintain/increase the availability of decent, safe and affordable housing and be responsible stewards of the region’s finite resources

- Maximize utilization of Section 8 Housing Choice Voucher program funds and vouchers
- Apply for additional Vouchers if made available
- Administer the Project-Based Voucher program and continue to offer PBVs as an opportunity to gain affordable units in resource rich neighborhoods.
- Continue to own and operate 150 Council-owned affordable housing units in suburban locations
- Maintain high performer Section 8 Management Assessment Program (SEMAP) status
- Continue to assess HRA operations, evaluate current policies and procedures to ensure the agency is operating at its optimal level
- Continue to apply for new funding and program opportunities when they become available
- Continue to work towards receiving a Moving to Work status

**PROGRESS:**

- Maintained 99% utilization for the HCV program in most recent funding year.
- Received and issued Foster Youth to Independence Vouchers for 11 youth in partnership with three local counties.
- Received an additional 30 VASH vouchers.
- 400 households selected from the HCV waitlist.
- Operated 154 Council-owned housing units at 97% occupancy, in partnership with Kingswood Management.
- Continue to assess operations, policies and procedures and make policy and procedural changes as needed.
- Successfully exited the pilot phase of the Community Choice Mobility Demonstration Program awarded in partnership through a competitive grant application with Minneapolis Public Housing Authority. This award added 37 new vouchers to the HRA. From September 2022 – May 2023, 129 participant households have enrolled and 62 are receiving services.
- Received 218 Emergency Housing Vouchers (EHV) to be used for people who are experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence and at high risk of housing instability. As of May 2023 VMS, current utilization is 83% with the EHV dashboard showing more current data at 87.16% (190 households) with three local Coordinated Entry systems for referrals.
- Offered twenty (20) VASH and twenty (20) Mainstream PBVs through a competitive solicitation. Five new developments were tentatively awarded 35 PBVs assuming they are fully-funded and one existing development will be awarded five PBVs with future board approval.

**GOAL:** Increase assisted housing choices for all residents across race, ethnicity and income through expansive owner recruitment and retention efforts

**Recruitment:**

- Conduct landlord outreach to unit owners, including owners in resource rich areas
- Conduct regular landlord meetings to explain program for new or potential landlords
- Conduct presentations to educate landlords and property owners about the Section 8 program at various landlord groups
- Conduct focus group conversations to non-participating landlords
- Maintain HRA web page providing program information for potential landlords

**Retention:**

- Conduct annual owner workshops
- Maintain HRA web page providing program information for current landlords
- Circulate owner newsletter

**PROGRESS:**

- Launched and rebranded HCV 101 Sessions for prospective landlords and turnover property staff to learn about the Metro HRA’s HCV program and how to work with voucherholders. Since relaunching, the HRA has hosted four sessions with 80 landlords attending.
- Launched and rebranded an electronic landlord newsletter that is scheduled for regular updates semi-annually.
- Updated the existing New Owner briefing presentation to be reflective of current HRA policies and procedures.
- Maintained a mitigation fund to support families who have identified financial barriers in placing their voucher. Financial barriers may include application fees, hold fees, and security deposits. This fund may also be used to support landlord retention.
- Implemented a formal process in February 2023 to log first contacts with landlords not participating in HRA programs resulting in over 150 logged contacts and 30 new landlords.
- Conducted a comprehensive review of city-based rental licensing and landlord databases through quantitative and qualitative data collection. Surveys to 111 cities resulted in 93 survey responses and eight in-depth follow-up interviews focusing on methods and ideas for landlord engagement, assessing readiness to partner with Metro HRA on landlord outreach, and support needs rental licensing and landlord engagement. The results will inform future landlord engagement.

**GOAL:** Encourage movement to areas in the region with less than 20% poverty and above average performing schools

- Educate participants on potential outcomes of moving to high-opportunity areas near good schools with lower crime and along the region’s transit routes
- Provide mobility counseling services to educate and encourage movement to resource rich areas
- Measure progress and learn from results to guide policy refinement

**PROGRESS:**

- Continued participation in the Community Choice Mobility Demonstration Program in partnership with Minneapolis Public Housing Authority through a competitive grant application officially exiting the pilot phase of the Demonstration June 1, 2023. This added 37 new vouchers to the HRA.
• Expanded the HRA’s Outreach team to eight staff to facilitate stronger community partnerships, greater landlord recruitment and retention strategies, and increased resident engagement.
• Design and implement a Housing Search Workshop to be hosted every other month for prospective movers and/or households selected from the agency’s HCV waitlist
• Hosted a PBV Developer information session prior to the PBV RFP in addition to two one-hour “office hours” sessions for developers to engage with HRA staff

GOAL: Administer programs to encourage integrated settings to provide rental assistance for persons with disabilities

• Administer the Non-Elderly Disabled program, providing Section 8 rental assistance to disabled families and individuals
• Administer the Minnesota state-funded Housing Trust Fund program to provide rental assistance to persons who are homeless or at imminent risk of homelessness in partnership with Anoka County’s Coordinated Entry system.
• Administer a Family Unification Program in partnership with Anoka County, promoting housing stability for families involved in the child protection system
• Apply for additional Mainstream vouchers, if available

PROGRESS:
• Continue to assist 200 non-elderly people with disabilities through Non-Elderly Disabled (NED) Vouchers.
• Awarded 89 Mainstream Vouchers in 2018, 67 in 2019, 47 in 2020, and an additional 50 in 2022 to provide rent assistance for non-elderly persons with disabilities experiencing homelessness or at risk of homelessness.
• Implemented housing stability interventions for existing Mainstream and Emergency Housing Voucher families. Interventions include proactive calls prior to annual recertification, assistance with the recertification process, and access to other resources in commitment to maintaining housing.

GOAL: Promote self-sufficiency and stabilize families

• Educate voucher tenants through financial literacy and tenant education classes
• Provide housing search assistance to applicants with high barriers
• Focus on a person-centered approach, setting program participants up for success
• Provide PBVs in supportive housing projects
• Implement harm reduction and prevention strategies to foster housing stability
• Research and explore HCV Homeownership program

PROGRESS:
• Continue to operate Project Based Vouchers in supportive housing projects that focus on self-sufficiency.
• Apply in partnership with a local county for Homework Starts with Home as the rental assistance administrator to further advance the agency’s place-based strategies and programming.
• Lease twenty (20) households referred through the Homework Starts with Home Move-up preference supporting housing stability initiatives.
• Continue to explore community partners for a HCV Homeownership program. Hosted a Resident Advisory Board special session in October 2022 to engage residents in continued homeownership discussion.
• Explore the creation of an ongoing resident cohort focused on strategies and approach to wealth building and financial empowerment support for voucherholders.
• Maintain and further explore relationships with two established community partners that offer thorough financial empowerment and literacy trainings
• Revising current web-based tenant education to an updated online platform with more extensive module capabilities.

B.4 Capital Improvements. – Not Applicable.

B.5 Most Recent Fiscal Year Audit.
(a) Were there any findings in the most recent FY Audit?

Y  N  N/A
☐  ☒  ☐

(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, 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.

### 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, 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.

### 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?

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Y</td>
<td>N</td>
</tr>
</tbody>
</table>

If yes, include Challenged Elements.

### 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:** Increase the supply of affordable housing in high opportunity areas.

*Describe fair housing strategies and actions to achieve the goal*

Metro HRA employs an outreach team who regularly engage with owners in opportunity areas toward recruitment and retention. The Metro HRA outreach team creates, establishes, and maintain a variety of strategies to increase landlord participation throughout its service area. These activities include:

- Employ two Outreach Coordinators tasked specifically with landlord and resident engagement.
- Implemented a formal process to log first contacts with landlords who are not participating with HRA programs resulting in over 150 logged contacts and 30 new landlords.
- Launched and rebranded an HCV 101 Session for prospective landlords and turnover property staff to learn about Metro HRA programs and how to work with voucherholders. Since relaunching, the HRA has hosted four sessions with 80 landlord attendees.
- Continued use of a mitigation fund to support families who have identified financial barriers in placing their voucher. Financial barriers may include application fees, hold fees, and security deposits. This fund may also be used to support landlord retention.
- Updated internal processes for inspection scheduling creating more efficient scheduling practices, greater capacity for staff to process reinspection requests, and additional opportunities for staff to follow-up on initially failed inspections – especially with new landlords.
- Conducted research on which cities within Metro HRA’s 96 community service area have rental licensing inspection requirements. This required engagement with communities and provided tools for future collaboration on landlord recruitment and retention.

**Fair Housing Goal:** Ensure equal access to housing for persons with protected characteristics, lower income and experiencing homelessness.
Describe fair housing strategies and actions to achieve the goal

The Metro HRA operates a Mainstream program of 253 vouchers. This program provides rent assistance to non-elderly persons who are transitioning out of institutions, at risk of institutionalization, homeless or at risk of homelessness. The Metro HRA established a partnership with the Metro Transit Police Homeless Action Team and County partners for referral and service provision. The Metro HRA Outreach team provides housing search assistance, assistance with overcoming barriers to success, and housing stability interventions. Examples of housing intervention strategies include proactive engagement with the recertification process and access to supplemental resources in commitment to housing stability.

The Metro HRA was awarded 218 Emergency Housing Vouchers in 2021 to provide rent assistance and service connections to people experiencing homelessness, at risk of homelessness, fleeing or attempting to flee domestic violence or were recently homeless. The Metro HRA has Memorandums of Understanding with the three Continuums of Care in its service area for referral and service provision. As of May 2023 VMS, the Metro HRA is utilized at 83%. The Metro HRA assigned one lead eligibility staff to accept referrals and process intakes and one member of the HRA Outreach team to provide housing search assistance, act as a service provider liaison, and provide housing stability and intervention support.

The Metro HRA requested Foster Youth to Independence (FYI) Vouchers and received a total of eleven (11) in May and June 2022. The Metro HRA executed Memorandums of Understanding and accepts referrals for eligible youth from three local PCWAs. Youth in need of additional housing search support may be referred to the HRA’s Outreach team for additional support, as needed.

Stabilizing people experiencing homelessness and keeping people housed are goals of these three programs successfully administered by Metro HRA.

Fair Housing Goal: Reduce barriers to mobility

Describe fair housing strategies and actions to achieve the goal

The Metro HRA, in partnership with the Minneapolis Public Housing Authority, was selected to participate in the Mobility Demonstration Program, Community Choice Demonstration. The program is aimed at assisting voucherholders in moving to low poverty neighborhoods that are resource rich. The Metro HRA and MPHA officially exited the pilot phase of the Demonstration as of June 1, 2023. There are 129 participating households, 62 of which are receiving services as guided by the Demonstration.

The Metro HRA adopted Small Area Fair Market Rents, zip code-based rent limits, in 2020 to ensure voucherholders have access to all communities in Metro HRA’s service area. In 2022, the Metro HRA recommended and received board approval to adopt SAFMRs at 100% to ensure that families had continued choice and access. Many opportunity rich neighborhoods are also higher rent neighborhoods where SAFMRs are having an impact.

Metro HRA created a fund to assist voucherholders in the payment of security deposits and application fees to ensure fast lease up and reduce landlord vacancy time. Additionally, six members of the HRA Outreach team are certified to conduct HQS inspections to reduce barriers, as needed. Metro HRA continues to engage and recruit landlords in resource-rich neighborhoods.
Instructions for Preparation of Form HUD-50075-HCV
Annual PHA Plan for HCV-Only 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), Number of 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.

   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. (24 CFR §903.11(c)(3))
   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 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 and 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. 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. A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.5(b))

   □ Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support 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 rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

   □ Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).

   □ Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

   □ Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

   □ Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(ii)).

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

   □ Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan.

   If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.
B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

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. 

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

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.

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.

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. 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.

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 (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 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.