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

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

**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 <u>both</u> 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.

Α.	PHA Information.
A.1	PHA Name: GUAM HOUSING AND URBAN RENEWAL AUTHORITY PHA Type: Standard PHA Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 750 Number of Housing Choice Vouchers (HCVs) 2,718 Total Combined Units/Vouchers 3,468 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 FY2025 Annual and Five-Year PHA Plan were made available to the public for review and comment via (1) electronically on GHURA's website at <a href="https://www.ghura.org">www.ghura.org</a> , and (2) hard copies located at GHURA's main office lobby, the AMP Site Base offices, and the Guma Trankilidat office. Inquiries were sent to Ms. Philly San Nicolas, Property Site Manager, via her email address, <a href="https://www.ghura.org">phillysn@ghura.org</a> or contacted via phone at (671) 475-1348.  Residents were requested to contact their respective Site Base Office for an appointment to review the FY2025 Annual and Five-Year PHA Plan and other documents included in the Plan. The contact information is as follows:
	<ul> <li>and Five-Year PHA Plan and other documents included in the Plan. The contact information is as follows:</li> <li>GHURA Main Office: (671) 475-1330, 117 Bien Venida Avenue, Sinajana, Guam 96910</li> <li>AMP1: (671) 477-9823, Paquito Street, Toto Gardens, Toto, Guam 96910</li> <li>AMP2: (671) 789-9062, 10 JC Rojas Street, Yona, Guam 96915</li> <li>AMP3: (671) 565-9854, Pagachao Drive, Agat, Guam 96915</li> <li>AMP4: (671) 475-1395, 27 Doni Lane, Toto Gardens, Toto, Guam 96910</li> <li>Guma Trankilidat: (671) 646-6301, 145 Trankilidat St., Tumon, Guam 96913</li> <li>Section 8 FSS Coordinators: (671) 475-1333 or (671) 475-1339</li> </ul>
	The first of three meetings with our RAB members was held on March 8, 2024, to discuss (a) the November 2023 Revisions to the Public Housing's Admissions and Continued Occupancy Policy (ACOP), (b) FY2024 Capital Fund

Program and Five-Year Action Plan for 2024-2028, and (c) FY2025 PHA 5-Year and Annual Plans

RAB members were provided with an agenda, a synopsis of the ACOP revisions, a list of proposed projects under the new 2024 CFP grant, and general information about the 2025 Annual and Five-Year PHA Plans.

The Public's comments are important to us. GHURA had advertised the public comment periods and public hearings for the items stated, as follows:

- November 2023 Revisions to ACOP:
  - Public Comment December 18-February 2, 2024; Public Hearing February 2, 2024
- FY2024 Capital Fund Program and Five-Year Action Plan:
  - Public Comment February 19-April 4, 2024; Public Hearing April 4, 2024
- FY2025 PHA 5-Year and Annual Plans:
  - Public Comment May 2-June 15, 2023; Public Hearing June 16, 2023
- FY2024 PHA Annual Plan:
  - Public Comment ; Public Hearing -

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
1 at ucipating 1 11As				PH	HCV
Lead PHA:					

В.	Plan Elements
B.1	Revision of Existing PHA Plan Elements.
	(a) Have the following PHA Plan elements been revised by the PHA?
	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.         □       Operation and Management. (ACOP, S8 Admin Plan, Family Self Sufficiency, and other Policies)         □       Grievance Procedures.         □       Homeownership Programs.         □       Safety and Crime Prevention.         □       Pet Policy.         □       Asset Management.         □       Substantial Deviation.         □       Significant Amendment/Modification
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
	Rent Determination GHURA will change the way income and rents are calculated to meet HUD's delayed HOTMA Section 102 compliance deadline of January 1, 2025. HOTMA Section 102 updates certain deductions used to calculate adjusted income and changes how total tenant payments are determined. Changes affecting imputed income from assets, elderly deductions, and medical expense deductions will be implemented once GHURA has adopted the changes in its ACOP, ultimately changing the process of rent determination.
	Operation and Management
	Homeownership Programs:  HOME Investment Partnership Funds – Homebuyer Program  The Program will develop affordable housing for purchase to qualified individuals or families. The Program is uniquely designed to cater to the needs of target populations identified as "Low Income Families", as defined by the U.S. Department of Housing and Urban Development (HUD), and identified under this Program as "First Time Homebuyers".
	The target populations are then placed in an order of preference. Preference shall be given to eligible individuals or families currently participating in the Authority's Housing Choice Voucher Program or Low-Income Public Housing Program. The homes must be the primary residence for all homebuyers throughout the affordability period under this Program. The standards of any home constructed under this Program shall be in conformance with the Uniform Physical Conditions Standards (UPCS) and any other related housing standards as adopted by the Government of Guam. In addition, the unit acquired or constructed shall conform to applicable zoning laws or any other statutory requirements of the Territory of Guam. The ultimate goal and objective of this Program is to increase homeownership opportunities to low-income qualified individuals or families and to promote safe, decent and sanitary housing in the Territory of Guam.
	Housing Counseling Program GHURA became a full-fledged HUD approved housing counseling agency on June 19, 2020. The Housing Counseling program aims to assist clients in the Home Investment Partnerships Grant program, the Family Self Sufficiency program, residents of Section 8 HCV and Public Housing, and the general public. The program covers a myriad of counseling topics, including Pre-Purchase, Post-Purchase counseling, budgeting, homeownership and tenancy, fair housing, avoidance of mortgage default and eviction and basic rental education. The service is free of charge.
	GHURA has aided approximately 40 clients with housing counseling services over the past three years. With both the one-to-one counseling and education pieces for housing clients, the agency anticipates an increased volume of clients. With the anticipated increase and long-term strategic planning, GHURA seeks to certify three additional personnel to become housing counseling certified (both for homeownership and renting) by the end of 2024. Expansion of services will also include an online first-time homebuyer training course.

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

The Deconcentration Policy, as noted in GHURA's 2024 ACOP, is included as EXHIBIT B.

• Chapter 4, pages 4-18 through 4-20

• Chapter 12, page 12-16

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

☐ Mean Hope VI or Choice Neighborhoods.
 ☐ Mixed Finance Modernization or Development.
 ☐ Demolition and/or Disposition.
 ☐ Designated Housing for Elderly and/or Disabled

☐ 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.

Demolition and/or Disposition:

AMP 3 - ?? removal of one unit for office

Occupancy by Over-Income Families:

SEE ACOP NOV 2023

*Units with Approved Vacancies for Modernization:* 

#### Other Capital Grant Programs:

Emergency Safety and Security Grant (ESSG) - GHURA was awarded \$250,000 for the 2023 Emergency Safety and Security Grant for the purchase of surveillance cameras, lighting, security alarms at HA wide developments to improve the health and safety of the residents. (added October 2023)

Housing Related Hazard Capital Fund Program (HRHCFP) - GHURA was awarded \$5,000,000 for the 2022 Housing-Related Hazard Capital Fund Program to address housing related hazards, such as Radon and Mold/Mildew. (added October 2023)

GHURA considers the age of the units, updated uniform building codes, and Guam's weather conditions as factors for units requiring to be upgraded and in compliance with industry standards. CFP funds are limited to address the physical needs of the developments, as stated in the 2018 Physical Needs Assessment.

#### **Use of Operating Reserves**

AMP 1 manages 158 units scattered over four (4) villages. The site lacks dedicated space for service providers to conduct outreach services. Mongmong is the largest site with 48 units (12 units at Tenbat and Coho and 36 located at VD Perez) servicing 117 children followed by Agana Heights-100; Asan- 70 and Sinajana- 67. The grounds at Mongmong- VD Perez is ideal for a Recreational center and basketball half court for residents within that site & the remaining three (3) sites at Asan, Agana Heights & Sinajana.

- RECREATIONAL CENTER
- HALF COURT BASKET BALL COURT

AMP 1 receives numerous complaints regarding parking at each of the sites but more predominately within Mongmong, the largest site. With a total of 59 combined parking slots; 8 at Tenbat and Coho and 51 at VD Perez, the parking needs

are apparent. Additional parking will alleviate double parking or curbside parking that obstructs emergency personnel from passing through the site.

ADDITIONAL PARKING AT THE SITES.

In addition to island wide devastation in terms of structural damage to homes, power and water infrastructure to name a few, AMP 1 experienced severe fence line damage after Typhoon Mawar in May 2023. Damages occurred at two sites within Mongmong and Asan with estimated costs around \$50,000.

- FENCE LINE REPAIRS
- SECURITY CAMERAS AND LIGHTING
- ROOF COATING AND UNIT PAINTING
- SIDEWALK AND CURBSIDE WATERBLASTING, PAINTING AND PARKING SLAB REPLACEMENTS/REPAIRS FOR PARKING
- SIGNAGE REPLACEMENTS

#### Progress Report.

**B.3** 

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

#### AMP 1 Progress Report

AMP 1 opened their Wait List (WL) on April 3, 2023 for about seven months and closed the WL on November 30, 2023. AMP 1 is currently at 99% Adjusted Gross Occupancy. GHURA continues to work with its community partners to advocate for accessing on-line WL application amongst the AMP sites when opened or referrals to other appropriate programs.

#### AMP 2 Progress Report

Waitlist – AMP 2 closed its waitlist on September 29, 2023. We are currently at 98% occupancy for month ending January 2024.

#### Community Quality of Life and Economic Vitality

Mane'lu is a local non-profit organization, translated in the Chamorro language meaning brother and sister. Mane'lu's goal is to Empower and Inspire the Youth and Families by creating multiple opportunities to engage with the community through continued contact and support. These opportunities include developing social and emotional resiliency, leadership skills and community stewardship. Mane'lu additionally leverages its other projects, such as the Micronesian Resource Center One-Stop Shop, Employment Empowerment Initiative, and Ready to Drive Workshops that provide parents and/or caretakers with culturally and linguistically appropriate programs to empower them to support their children. Manelu offers weekly site activities at all four (4) AMP sites.

- GHURA continues to encourage and partner with various government agencies and non-profit organizations to provide families in public housing access to outreach and educational opportunities. GHURA will continue to encourage partnership within the community and promote outreach opportunities to families in public housing.
- Mañe'lu is a local nonprofit organization whose mission is to provide education and empowerment to families and youths through mentoring. Opportunities provided for families includes developing social and emotional resiliency, leadership skills, and community stewardship. Staff from Mañe'lu continuously provide weekly site activities at the AMP sites including sponsored author readings and evidence-based curriculum for school aged children focused on improving self-concept, mental health and academic achievement. Students are encouraged to participate in weekly sports activities like basketball & pickleball or arts and crafts.
- Micronesian Resource Center One Stop Shop (MRCOSS), a special project of Mañe'lu, has been actively providing informational and educational services to families in public housing. Services provided includes document preparation such as FAS passport applications, public assistance applications, immigration documents, social security applications, and interpretation and translation services to families with English as a second language. Periodically, the project conducts workforce development outreaches that engages the families in public housing with series of workshops on financial literacy, job skills, resume writing, job application and interview preparation.

- An upcoming event in partnership with Mañe'lu include a 2024 summer program for elementary students and youths at Toto Gardens, Toto.
- Other programs include a pilot project GHURA initiated in April 2023 for HUD-assisted families who lives in public housing. This initiative continues to expand and explore partnership opportunities with distinct government agencies and non-profit organizations to provide educational and community outreach services to families in public housing including:
- Westcare Pacific Islands is a national organization spanned out in 17 states including Guam to provide educational
  promotions on prevention strategies addressing life challenges such as alcohol and substance abuse, teen pregnancy,
  and STI/HIV infections. Scheduled education and outreach opportunities includes workshop for parents and
  caregivers about the harms of underage drinking, alcohol and substance abuse prevention strategies and engage the
  youth through evidence base curriculum through mentoring.
- Guam Community College GED/Adult Education Program conducted an informational outreach on November 18, 2023 at GHURA 48, Dededo and November 22, 2023 at GHURA 250 Toto Gardens.
- On December 2, 2023, GCC Accounting Program conducted a training on financial literacy which covers a comprehensive array of topics including investment, credit improvement, budgeting, and savings.
- The American Job center/Department of Labor conducts an employment/training programs on October 28, 2023. As a result, few residents were able to obtain employment through the 2023 National Dislocated Grant.
- On June 28, 2023, GHURA Pilot Project took the initiative to partner with DPHSS to enroll seniors in public housing into the Disaster Supplemental Nutrition Assistance as a result of typhoon Mawar. In addition, food commodities were distributed to all seniors in public housing as a result of partnership with the Mayors Offices and Guam Congressman's Office.
- Upcoming events, as part of GHURA 2023 Pilot Project, includes quarterly health fairs hosted by GHURA in partnership with Department of Public and Social Services (DPHSS), Todu Guam Foundation (TGF), Micronesian Resource Center One Stop Shop (MRCOSS), and other community support partners. In addition, a summer program entitled, Educating the Mind and Leaving Violence Behind, will be offered to youths at Toto Gardens; the program aims to educate and empower youth through mentoring and sports to make positive decisions and avert from violence. This program will be hosted by AMP 4.

\*

The Guam Housing and Urban Renewal Authority provides housing assistance to Guam's very low to low-income households. For FYI 2023-2024, the U.S. Department of Housing and Urban Development (HUD) provided GHURA with an authorized budget of more than 42 million dollars to fund 2,718 rental assistance vouchers. The per unit cost during the assessed period is approximately \$1,500. The funds received are primarily for the following programs:

#### Housing Choice Voucher Program (HCV)

GHURA implements 2,108 Housing Choice Program vouchers, with an additional five awarded in 2023 (2,113 vouchers), and is 97% leased up. The purpose of the Section 8 Housing Choice Voucher Program is to provide rental assistance to eligible families in the private housing market. The U.S. Department of Housing and Urban Development defines the statutory and regulatory requirements of the HCV program and is the primary funding source for the assistance. Housing authorities are allowed to include discretionary policies in the program's operation to avail local laws, and these policies must be included in the agency's Administrative Plan. The Administrative Plan is a document approved by the GHURA (PHA) Board of Commissioners. The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the agency's jurisdiction and other jurisdictions within the fifty states and territories of the United States if there is a housing agency that administers the Housing Choice Voucher Program.

#### Project-Based Voucher Program (PBV)

Guam has 112 Project-based Program vouchers, which are 98% leased up. The Project-based units consist of 56 one-bedroom and 56 two-bedroom subsidized units for elderly renters ages 62 years

and older. The Section 8 Project-Based was established on a private and public partnership between GHURA and the Guam Facilities Foundation, Inc. (GFFI). GHURA provides the subsidy, and GFFI is the landlord for the units. GFFI is responsible for leasing and maintaining the units. Unlike the Section 8 tenant-based program, the Project-Based subsidy is attached to specific units; the assistance does not move with the family. Under this program, all 112 units are located at the Summer Town Estates in Dededo.

#### *HUD-Veterans Affairs Supportive Housing Program (VASH)*

The VASH is a referral-basis program between the GHURA and the Department of Veteran Affairs (V.A.). Guam receives housing assistance funding for 76 Veterans Affairs Supportive Housing vouchers, with 61 actively leased. The partnership permits chronically homeless veterans to receive housing assistance and case management from the V.A. It is a worthwhile program, and GHURA aims to continue to work with the Veterans Affairs Office to help our homeless veterans and their families afford decent, safe, and sanitary housing.

#### *Mainstream (M.S.)*

Guam receives funding for 15 Mainstream Housing Program vouchers, with an additional 15 vouchers awarded in 2023 (30 vouchers), and all vouchers 100% leased up. The Mainstream Program is a referral basis through a partnership with non-profit service providers, including the Department of Integrated Services for Individuals with Disabilities (DISID, Guam Behavioral Health and Wellness Authority, and other service providers for persons with disabilities. These vouchers are intended for non-elderly persons between the ages of 18 and 61 with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless.

#### Non-Elderly Disabled (NED)

Like the Mainstream Program, the NED Program is a referral basis program. Guam currently has 175 Non-Elderly Disabled vouchers, with 165 leased. The NED vouchers assist low-income, non-elderly disabled families and individuals with permanent housing. The recipients of NED vouchers are non-elderly head

of household, co-head, or spouse that is disabled.

#### Family Unification Program (FUP)

FUP vouchers are for families for whom the lack of adequate housing is a primary factor in the imminent placement (1) of the family's child or children in out-of-home care; and (2) of the delay in discharge of child or children to the family from out-of-home care. This program also includes an 18-month Voucher for youth at least 18 years old and not more than 21 years old who left foster care at age 16 or older and who do not have adequate housing. The FUP program is available only to families who are referred by the Department of Health and Social Services (DPHSS), Division of Public Welfare (DPW), and Bureau of Social Services Administration (BOSSA). Guam has 130 FUP vouchers, which are currently 99% leased.

#### Emergency Housing Voucher (EHV)

Guam has 87 Emergency Housing Vouchers, which are 100% leased up. The EHV program is available to assist individuals and families who are homeless, at risk of homelessness, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. Continuum of Care (COC) and other referring agencies determine whether the individual or family meets the eligibility criteria described in Notice PIH 2021-15 and then refer the family to GHURA. According to Section 13 of

the Notice PIH 2021-15, reissuance (i.e., vouchers issued upon turnover) of EHVs closed on September 30, 2023. This provision does not impact existing families and their continued assistance. The funds appropriated for the EHV program are available for obligation by HUD until September 30, 2030.

#### **OUTREACH PROGRAMS**

The Section 8 Division has resurrected the Renter's 101 Seminar in February 2024 and is available for voucher program participants. The seminar aims to inform participants about the primary Renter's responsibilities, such as housekeeping, budgeting, being a good neighbor and tenant, and reviewing family obligations to comply with program requirements. The seminar is available throughout the year and extended to Section 8 New Admissions participants and other GHURA housing program participants.

The Section 8 Division revived the Landlord Briefing Seminar in February 2024, and it is available to all landlords and property managers within GHURA's jurisdiction. The seminar has informational topics to include an overview of the Section 8 Voucher Program, the benefits of partnering with Section 8, and landlord responsibilities and requirements to meet standards for a decent, safe, and sanitary unit. This seminar is also utilized to present any updates to the program that will affect the landlords (i.e., the NSPIRE module). The seminar is conducted at least once a year and emphasizes forging

Occupancy Levels - Section 8 Programs, Public Housing (by AMP), and Guma Trankilidat

Program / AMP	# of Vouchers / Units	Leased / Occupied	Occupancy Rate
S8 Housing Choice Voucher	2113	2050	97%
Project-Based Voucher	112	110	98%
<b>Veterans Assistance Supporting Housing</b>	76	61	80%
Mainstream	15	15	100%
Near-Elderly & Disabled	175	165	94%
Family Unification Program	130	129	99%
<b>Emergency Housing Voucher</b>	87	87	100%
AMP 1 Central Site Base	158	154	97%
AMP 2 Southeast Site Base	163	153	94%
AMP 3 Southwest Site Base	195	180	92%
AMP 4 Northern Site Base	234	222	95%
Guma Trankilidat, Tumon	49	49	100%

#### Waiting Lists (Number of Applicants, by Income)

Program / AMP	Extremely Low (30% AMI)	Very- Low (50% AMI)	Low (80% AMI)	Above 80% AMI	Total
Section 8 Programs	558	87	41	8	694
AMP1	626	112	59	22	819
AMP2	6	4	3	0	13
AMP3	136	22	6	2	166
AMP4	180	13	14	3	210
Guma Trankilidat	9	6	2	0	17

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.

Capital Fund Program GQ08P00150123, approved 07/03/2023.

Capital Fund Housing Related Hazards Grant GQ08H00150122, awarded October 2023.

Capital Fund Emergency Safety and Security Grant GQ08E00150123, awarded October 2023.

#### 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:

#### GUAM HOUSING AND URBAN RENEWAL AUTHORITY

Schedule of Findings and Questioned Costs Year Ended September 30, 2022

#### Finding No.: 2022-001: Entitlement Grants Cluster Reporting

Views of Responsible Officials and Planned Corrective Action

The Integrated Disbursement and Information System (IDIS) accounts for transactions using the cash basis method of accounting (real-time) while GHURA's trial balance reflects transactions using the accrual basis method of accounting. Due to the differing accounting methods, variances are expected between reports extracted from IDIS and GHURA's accounting system.

The responsible party will prepare a reconciliation between GHURA's trial balance and the IDIS reports to ensure the completeness and accuracy of the reported amounts. GHURA agrees with the recommendation to monitor subawards for reporting in FSRS.

Responsible Party: Katherine Taitano, Chief Planner; Jerricho Garcia, General Accounting Supervisor Anticipated Date of Completion: September 30, 2024

# Finding No.: 2022-002: Emergency Solutions Grant Program Special Tests and Provisions—Obligation, Expenditure, and Payment Requirements

Views of Responsible Officials and Planned Corrective Action

GHURA agrees with the recommendation to review and process payment requests from subrecipients within the 30-day time frame.

Responsible Party: Katherine Taitano, Chief Planner; Jerricho Garcia, General Accounting Supervisor Anticipated Date of Completion: September 30, 2024

#### Finding No.: 2022-003: Public and Indian Housing Procurement and Suspension and Debarment

Views of Responsible Officials and Planned Corrective Action

Responsible procurement personnel are updating the procurement policies which include emergency procurement and small purchases.

Responsible Party: Antonio Camacho, Supply Management Administrator

Anticipated Date of Completion: Ongoing effort and as training is made available.

#### Finding No.: 2022-004: Housing Voucher Cluster Reporting

Views of Responsible Officials and Planned Corrective Action

Responsible accounting personnel will coordinate and prioritize with HUD to resolve the submission of its audited Fiscal Year 2020 and 2021 financial information as required in the Financial Assessment Sub-System (FASS-PH) so that the Authority can meet the reporting requirement.

Responsible Party: Frances Danieli, Controller

Anticipated Date of Completion: Ongoing effort with HUD

## Finding No.: 2022-005: Housing Choice Cluster Special Tests and Provisions – Rolling Forward Equity Balances

Views of Responsible Officials and Planned Corrective Action

Responsible accounting personnel will coordinate and prioritize with HUD to resolve the submission of its audited Fiscal Year 2020 and 2021 financial information as required in the Financial Assessment Sub-System (FASS-PH) so that the Authority can meet the reporting requirement.

Responsible Party: Frances Danieli, Controller

Anticipated Date of Completion: Ongoing effort with HUD

# GUAM HOUSING AND URBAN RENEWAL AUTHORITY Summary Schedule of Prior Year Audit Findings Year Ended September 30, 2022

2021-001	Corrective action has been taken. The SEFA was reconciled to the General Ledger via the Trial Balance for the interim and final SEFA reports. Capital assets were included in the appropriate ALN.
2021-002	Corrective action has been taken. The CDBG grant funds are accounted for in HUD's integrated Disbursement and Information Systems (IDIS) in accordance with program income requirements.
2021-003	Corrective action has been taken. The entitlement grant funds (EN) and program income (PI) reported in the CO4PRO3 – Activity Summary Report agree with the accounting records.
2021-004	This finding is resolved. GHURA has not submitted the required FY2020 and FY2021 unaudited and audited financial information in the FASS-PH.
2021-005	This finding is resolved. GHURA has not submitted the required FY2020 and FY2021 unaudited and audited financial information in the FASS-PH.
2020-001	Corrective action has been taken. The SEFA was reconciled to the General Ledger via the Trial Balance. Capital assets were included in the appropriate ALN.
2019-001	Corrective action has been taken. In October 25, and November 9, 2020, the Accountant II and Deputy Controller were hired, respectively. For FY 2021 the SEFA was reconciled to the General Ledger accounts via the Trial Balance.
2019-002	Corrective action has been taken. Program income has been recorded in HUD's Integrated Disbursement and Information System (IDIS) and is being monitored on a quarterly basis. GHURA receives technical assistance from HUD to improve its planning for the use of program income.

	its audited Fiscal Year 2019, 2020, and 2021 financial information as required in the Financial Assessment Sub-System (FASS-PH) so that the Authority can meet the reporting requirement for its CARES Act Funding.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
C.1	(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	<b>Challenged Elements.</b> 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:

This finding is unresolved. The Capital Fund Grant reconciliations are ongoing. Responsible

accounting personnel will coordinate and prioritize with HUD to resolve the submission of

2017-01

Affirmatively Furthering Fair Housing (AFFH).
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:
Describe fair housing strategies and actions to achieve the goal
Fair Housing Goal:  Describe fair housing strategies and actions to achieve the goal
Eair Housing Goal:
Fair Housing Goal:  Describe fair housing strategies and actions to achieve the goal

### **Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs**

- 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))
- Plan Elements. All PHAs must complete this section.
  - В

.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 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 $\S903.7(a)(2)(i)$ ) 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 $\S903.7(a)(2)(ii)$ )
	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))
	☐ <b>Homeownership Programs</b> . 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(1)). 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(1))

☐ 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

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)) 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 **B.2** 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))

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

	Ccupancy 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))
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	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))
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	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.
•	December 4 P. HA. 1DI CH. 1. 1. 1. Cd. C. (A. 1DI DITA (1. 1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1
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

- В. meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
- 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.