

DATA COLLECTION TOOL FOR INFORMATION TO COMPLETE ANNUAL PHA PLAN

Housing Authority of the City of Lubbock

The following information is needed to complete the HUD-50075 PHA Plan form.

A. PHA Information

PHA Name: Housing Authority of the City of Lubbock **PHA Code:** TX018

PHA Type: Small High Performer

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2020

PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning above)

Number of Public Housing (PH) Units: 306

Number of Housing Choice Voucher (HCVs): 899

Total Combined Units/Vouchers: 1205

PHA Plan Submission Type: Annual Submission Revised Annual Submission

The following are the specific locations where the public may obtain copies of the 2020 Annual Plan:

- Administrative Office – 1708 Crickets Avenue, Lubbock, TX 79401
- Cherry Point Office – 1329 E. 19th, Lubbock, TX 79403
- 36 South Office – 1318 52nd C, Lubbock, TX 79412
- Behner Place Office – 4215 36th, Lubbock, TX 79413
- Mary Myers Office – 5421 Utica, Lubbock, TX 79413
- 96 West Office – 2410 Frankford, Lubbock, TX 79407
- Lubbock Housing Authority website – lubbockha.org

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

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
Lead HA:					

Deconcentration Policy
(See attachment tx018b01)

Statement of Housing Needs and Strategy for Addressing Housing Needs
REVISION

Statement of Housing Needs REVISION

Affordable housing is still a high need. Over 50% of renters are overburdened in next payments. The Housing Authority continues to run a waiting list.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	14,032	4	5	4	4	6	6
Income >30% but <=50% of AMI	11,024	4	5	4	4	3	3
Income >50% but <80% of AMI	15,241	4	5	4	4	3	3
Elderly	2,800	4	5	4	4	3	3
Families with Disabilities	16,471	4	4	4	4	3	3
White	16,905	4	5	4	4	3	3
Black/African American	7,065	4	5	4	4	3	3
American Indian/Alaska Native	76	4	5	4	4	3	3
Asian	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Native Hawaiian/Other Pacific Islander	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Hispanic	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	519		
Extremely low income <=30% AMI	Not Available		
Very low income (>30% but <=50% AMI)	Not Available		
Low income (>50% but <80% AMI)	Not Available		
Families with children	396	76%	
Elderly families	31	6%	
Families with Disabilities	126	24%	
White	305	59%	
Black/African American	160	31%	
American Indian/Alaska Native	4	1%	
Asian	1	0.19%	
Native Hawaiian/Other Pacific Islander	1	0.19%	
Hispanic	2	0.39%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	114	22%	
2 BR	142	27%	
3 BR	193	37%	
4 BR	66	13%	
5 BR	4	1%	
5+ BR	0	0%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 2 months Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input checked="" type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction: Park Meadows (32 Low income tax credit units)			
	# of families	% of total families	Annual Turnover
Waiting list total	5		
Extremely low income <=30% AMI	5	100%	
Very low income (>30% but <=50% AMI)	0	0%	
Low income (>50% but <80% AMI)	0	0%	
Families with children	2	40%	
Elderly families	0	0%	
Families with Disabilities	3	60%	
White	0	0%	
Black/African American	3	60%	
American Indian/Alaska Native	0	0%	
Asian	0	0%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	2	40%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	3	60%	
2 BR	1	20%	
3 BR	1	20%	
4 BR	N/A	N/A	
5 BR	N/A	N/A	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? N/A Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes N/A Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	565		
Extremely low income <=30% AMI	Not Available		
Very low income (>30% but <=50% AMI)	Not Available		
Low income (>50% but <80% AMI)	Not Available		
Families with children	360	64%	
Elderly families	65	12%	
Families with Disabilities	185	33%	
White	304	54%	
Black/African American	223	39%	
American Indian/Alaska Native	3	1%	
Asian	2	0.35%	
Native Hawaiian/Other Pacific Islander	1	0.17%	
Other	6	1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	
2 BR	N/A	N/A	
3 BR	N/A	N/A	
4 BR	N/A	N/A	
5 BR	N/A	N/A	
5+ BR	N/A	N/A	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 2 months Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Strategies for Addressing Housing Needs

Need: Shortage of affordable housing for all eligible populations

PHA shall maximize the number of affordable units available to the PHA within its current resources by:

- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program

PHA shall increase the number of affordable units available to the PHA within its current resources by:

- Apply for additional Section 8 units should they become available

Need: Specific Family Types: Families at or below 30% of median

PHA shall target available assistance to families at or below 30% of AMI by:

- FSS Programs to support and encourage work
- Apply for applicable programs as funding becomes available

Need: Specific Family Types: Families at or below 50% of median

PHA shall target available assistance to families at or below 50% of AMI by:

- FSS Programs to support and encourage work

Need: Specific Family Types: The Elderly

PHA shall target available assistance to the elderly by:

- Apply for special-purpose vouchers targeted to the elderly, should they become available

Need: Specific Family Types: Families with Disabilities

PHA shall target available assistance to Families with Disabilities by:

- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing

- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

PHA will increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs

The PHA will conduct activities to affirmatively further fair housing by:

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the Section 8 program to owners outside areas of poverty/minority concentrations

Reason for Selecting Strategies:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions *REVISION*

Public Housing

(1) Eligibility

Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:

- (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
- (ii) An elderly family;
- (iii) A near-elderly family;
- (iv) A disabled family;
- (v) A displaced family; and
- (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

The Housing Authority of the City of Lubbock verifies eligibility for admission to public housing when unit becomes available and offer is made.

The PHA uses the following non-income screening factors to establish eligibility for admission to public housing:

- Criminal or Drug-related activity
- Rental history
- Criminal background check
- Drug Treatment Center check
- Sex Offender Registration check
- Citizenship/Legal Non-Citizen Status check
- The PHA will attempt to ascertain whether domestic violence was a factor in the poor rental and tenancy history and exercise discretion in determining suitability for tenancy, taking into consideration the circumstances that may have contributed to the negative reporting.

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies

(2) Selection and Assignment

Selection for admission to public housing shall be made from the PHA's current waiting list in accordance with date and time of application.

(3) Preferences **REVISION**

The PHA does not plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of the median area income.

It is the policy of the PHA that transfers will take precedence over new admissions in the following circumstances:

- Emergencies
- Over-housed
- Under-housed
- Medical justification
- Administrative reasons determined by the PHA
- Domestic Violence

In accordance with the Department's request to assist existing voucher program participants who were affected by Hurricane Katrina, the Housing Authority of the City of Lubbock amended its Admission and Continued Occupancy Policy as follows. This amendment is in accordance with the Housing Authority's Natural Disaster Response Policy (Emergency Action Plan).

The Lubbock Housing Authority (LHA) will employ a preference for a disaster affected family over other waiting list placeholders as follows:

- (1) To a disaster affected family qualified by the Federal Emergency Management Agency (FEMA) to be in the federally declared disaster area and are Public Housing residents
- (2) To a disaster affected family applying for Public Housing assistance who is qualified by the Federal Emergency Management Agency (FEMA) as a disaster affected family and who is income eligible

The LHA will require the disaster affected family to self-certify to its rental history, drug activity and criminal history, and all other elements of the LHA's screening process.

Should the disaster affected family refuse to comply with the self-certification, the LHA will deny the family public housing assistance.

Should the self-certification prove to be inaccurate, the family's public housing assistance will be terminated with a thirty (30) day written notice.

The PHA plans to employ the following admission preferences for admission to public housing:

Priority Preference

1 - Applicant families whose head of household, or spouse is employed or has an offer for employment

1 - Elderly and/or Disabled

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that the PHA will meet income targeting requirements.

(4) Unit Assignment

Applicants are ordinarily given one (1) vacant unit choice before they fall to the bottom of, or are removed from the waiting list. This policy is consistent across all waiting list types.

(5) Maintaining Waiting List

The Housing Authority of the City of Lubbock maintains a community-wide waiting list except for site-based waiting list for Park Meadows 2.

Interested persons may apply for admission to public housing at the main administrative office located at 1708 Crickets Avenue, Lubbock, Texas or at the following development site management office:

- Park Meadows 2
2627 Oak Drive
Lubbock, TX 79404

The Housing Authority of the City of Lubbock operates one (1) site-based waiting list at Park Meadows 2. This site-based waiting list is a previously HUD approved site-based waiting list plan.

Families may be on three (3) waiting lists simultaneously as follows:

- Site-based list at Park Meadows 2
- Public Housing waiting list
- Section 8 HCV waiting list

Interested persons may obtain more information about and sign up to be on the site-based waiting list at the main administrative office located at 1708 Crickets Avenue, Lubbock, Texas or at the following development site management office:

- Park Meadows 2
2627 Oak Drive
Lubbock, TX 79404

(6) Occupancy

Applicants and residents may use the following reference materials to obtain information about the rules of occupancy of public housing.

- PHA-resident lease
- The PHA's Admissions and Continued Occupancy Policy
- PHA's briefing seminars or written materials

Residents must notify the PHA of changes in family composition:

- At any time family composition changes

(7) Deconcentration and Income Mixing **REVISION**

The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results follow:

The PHA does have general occupancy public housing developments covered by the deconcentration rule.

None of the covered developments have average incomes that fall above or below the Established Income Range.

Section 8

(1) Eligibility

Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - (ii) An elderly family;
 - (iii) A near-elderly family;
 - (iv) A disabled family;
 - (v) A displaced family; and
 - (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

The PHA conducts screening to the extent of:

- Criminal or Drug-related activity only to the extent required by law or regulation
- Domestic Violence – Attempt to ascertain whether domestic violence was a factor in the poor rental and tenancy history or criminal activity and exercise discretion in determining suitability for tenancy about the circumstances that may have contributed to the negative reporting.

The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies

The PHA shares the following information with prospective landlords:

- Current and previous landlord name and address
- Resident name and mailing address (last known to PHA)

(2) Waiting List Organization

The Housing Authority of the City of Lubbock's waiting list for the Section 8 tenant-based assistance is not merged with any other program waiting list.

Interested persons may apply for admission to Section 8 tenant-based assistance at:

- PHA main administrative Office

(3) Search Time

The PHA does give extensions on standard 60-day period to search for a unit as follows:

- Illness, hard to house, family emergency/death, not to exceed 120 days

(4) Preferences **REVISION**

The PHA does not plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the Section 8 Program to families at or below 30% of the median area income.

In accordance with the Department's request to assist existing voucher program participants who were affected by Hurricane Katrina, the Housing Authority of the City of Lubbock amended its Section 8 Administrative Plan as follows. This amendment is in accordance with the Housing Authority's Natural Disaster Response Policy (Emergency Action Plan).

The Lubbock Housing Authority (LHA) will employ a preference for a disaster affected family over other waiting list placeholders as follows:

- (1) To a disaster affected family qualified by the Federal Emergency Management Agency (FEMA) to be in the federally declared disaster area and are Section 8 Voucher holders
- (2) To a disaster affected family applying for Section 8 assistance who is qualified by the Federal Emergency Management Agency (FEMA) as a disaster affected family and who is income eligible

The LHA will require the disaster affected family to self-certify to its rental history, drug activity and criminal history, and all other elements of the LHA's screening process.

Should the disaster affected family refuse to comply with the self-certification, the LHA will deny the family Section 8 assistance.

Should the self-certification prove to be inaccurate, the family's Section 8 assistance will be terminated with a thirty (30) day written notice.

This preference does not affect the Special Purpose Vouchers administered by the Housing Authority: Mainstream Vouchers or Family Unification Vouchers.

Special Purpose Voucher holders that no longer qualify will be given preference for a regular Section 8 voucher as long as they are still eligible.

The PHA plans to employ the following admission preferences for admission to Section 8:

Priority Preference

- 1 - Applicant families whose head of household, or spouse is employed or has an offer for employment***
- 1 - Elderly and/or Disabled***

Among applicants on the waiting list with equal preference status applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensures that the PHA will meet income targeting requirements.

(5) Special Purpose Section 8 Assistance Programs

The policies governing eligibility, selection and admissions to any special-purpose Section 8 program administered by the PHA are contained in the following documents or other reference materials:

- The Section 8 Administrative Plan
- Briefing sessions and written materials

The PHA announces the availability of any special-purpose Section 8 program to the public through:

- Family Unification Program Vouchers
- Mainstream Program Vouchers
- Veterans Affairs Supportive Housing (VASH)

Financial Resources *REVISION*

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2020 grants)		
a) Public Housing Operating Fund	1,388,484.00	
b) Public Housing Capital Fund	864,481.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	6,500,000.00	
f) Resident Opportunity and Self- Sufficiency Grants	46,113.00	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
501-17 CFP Grant	33,132.00	Public housing capital improvements
501-18 CFP Grant	86,343.00	Public housing capital improvements
501-19 CFP Grant	812,095.00	Public housing capital improvements
3. Public Housing Dwelling Rental Income	600,000.00	Public housing operations
4. Other income (list below)		
Tenant charges	27,000.00	Public housing operations
5. Non-federal sources (list below)		
Total resources	\$10,357,648.00	

Rent Determination REVISION

Public Housing

(1) Income Based Rent Policies

a. Use of discretionary policies

The PHA will employ discretionary rent-setting policies for income-based rent in public housing.

b. Minimum Rent

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. The minimum rent requirement may be waived due to certain financial hardships. The request for minimum rent hardship must be made in writing to the PHA prior to the rent becoming delinquent. The PHA will verify whether the hardship claimed is temporary or long term. Payment of the minimum is suspended immediately for ninety days when a hardship is requested on one of the following conditions:

- a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;
- b. The family income has decreased due to changed circumstances such as loss of employment, separation, divorce, and abandonment;
- c. The family would be evicted as a result of imposing the minimum rent requirement;
- d. There has been a death in the family; or
- e. There are other hardship situations determined by the PHA on a case-by-case basis, i.e. alimony, child support, etc.

Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP) or Flat Rent in the public housing program.

2. If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:
 - a. Rent may be suspended, during the ninety (90) day period beginning on the day the request is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension.
 - b. The PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.
 - c. The family may not be evicted for non-payment of rent during this ninety (90)-day suspension period.
 - d. If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.
 3. If the circumstances supporting the request for a minimum rent hardship exemption are long term, tenant's rent will be based on the statutory income-based rent calculation formula during the minimum rent exemption period.
 4. Hardship determinations are subject to the PHA's Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.
- c. Rents set at less than 30% than adjusted income
- The PHA does not plan to charge rents at a fixed amount or percentage less than 30% of adjusted income.
- d. Discretionary deductions and/or exclusion policies
- The PHA does not plan to employ any discretionary (optional) deductions and/or exclusions policies.
- e. Ceiling Rents
- The PHA does not have ceiling rents.
- f. Rent Re-determinations
- Between annual income reexaminations, the tenant is required to report changes in income or family composition to the PHA such that the changes result in an adjustment to rent as follows:
- Any time the family experiences an income increase

Additional family members cannot be added without written approval from the PHA. With the exception of a new birth, members added to the family will undergo the screening process required before the PHA makes its decision to approve or disapprove adding a new member.

g. Individual Savings accounts (ISAs)

The PHA does not plan to implement individual savings accounts for residents as an alternative to the required 12-month disallowance of earned income and phasing in of the rent increase in the next year.

(2) Flat Rents **REVISION**

The PHA used the following sources of information in setting the market-based flat rents to establish comparability.

- The Section 8 rent reasonableness study of comparable housing
- Lubbock Apartment Association – apartment directory
- ***Guidelines found in the 2015 Appropriations Act (PIH 2015-13) in determining the Public Housing Flat Rent schedule. The PHA will establish a flat rent for each public housing unit that is no less than 80% of the applicable Fair Market Rent (FMR)***

Section 8

(1) Payment Standards

The PHA's payment standard is:

- At or above 90% but below 100% of FMR

The PHA has selected this standard because:

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket

The PHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:

- Success rates of assisted families

(2) Minimum Rent

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

1. The minimum rent requirement may be waived under certain circumstances. Financial hardship status is to be granted immediately for ninety (90) days in the event of the following:
 - a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;
 - b. The family income has decreased due to changed circumstances such as separation, divorce, and abandonment;
 - c. One or more family members have lost employment;
 - d. The family would be evicted as a result of imposing the minimum rent requirement;
 - e. There has been a death in the family; or
 - f. There are other hardship situations determined by the PHA on a case-by-case basis, i.e. alimony, child support, etc.Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP).
2. If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:
 - a. If the hardship is determined to be temporary, minimum rent may be suspended; during the ninety (90) day period beginning on the day the request is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension and the HAP is again adjusted.
 - b. In the case of a temporary hardship, the PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.
 - c. If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.

- d. Note that the PHA can only suspend the minimum rent contribution. If the family is residing in a unit whose Gross Rent exceeds the Payment Standard, the family will be responsible for the excess rent.
3. Hardship determinations are subject to the PHA's Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.

Operation and Management REVISION

(1) PHA Management Structure

- a. A brief description of the management structure and organization of the PHA.

The Executive Director directs the day-to day management and operation of the Housing Authority with the assistance of the following managers and lead staff.

Section 8 Administrator (1)

- Section 8 Caseworkers (3)
- Section 8 Inspector (1)
- FSS Coordinator (1)
- Occupancy Specialist (1)
- Receptionist (1)

Public Housing Administrator (1)

- AMP Housing Managers (2)
- Maintenance Staff (6)
- Clerical Assistants (3)
- PH Occupancy (1)

Executive Assistant/HR (1)

CFP/Construction Superintendent (1)

Accountant (1)

- Accounting Clerk (1)

Compliance Officer (1)

b. HUD Programs Under PHA Management **REVISION**

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	366	37
Section 8 Vouchers	1034	82
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually)	(FUP) 30 VASH 75	
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs (list individually)		
Homeownership	1	
FSS – Section 8	24	
FSS – Low Rent	0	

c. Management and Maintenance Policies

The PHA has adopted the following policies that contain the Agency’s rules, standards, and policies that govern management, operation, and maintenance of the Public Housing and Section 8 assistance programs.

Public Housing Management:

- Work Order System
- Pest Eradication Policy
- Maintenance Plan
- Uniform Inspection System
- Admissions and Continued Occupancy Policy (ACOP)
- ACOP Procedures Manual
- Fair Housing Policy
- Grievance Procedures
- Tenant Selection and Assignment Plan
- Community Service Plan
- Handicapped Policy
- Termination and Eviction Policy
- Transfer and Transfer Waiting List Policy
- Resident Initiative
- FSS Action Plan
- Section 3 Plan
- Pet Policy for Families/Elderly
- Procurement Policy
- Personnel Policy

- Deconcentration and Income Targeting Policy
- Fraud Policy
- Natural and National Disaster Policy and Plan
- Capitalization Policy
- Cash Management Internal Control Policy
- Check Writing Policy
- Collection Loss Policy
- Credit Card Policy
- Disposition Policy
- Doubtful Accounts Policy
- ELOCCS Policy
- Investments Policy
- Petty Cash Policy
- Policy for Acquiring Insurance Coverage
- Repayment Agreement Policy

Section 8 Management:

- Administrative Plan
- SEMAP Procedures
- Section 8 Procedures Manual

Grievance Procedures

Public Housing

The PHA has not established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing.

Residents or applicants who desire to initiate the PHA grievance Process should contact the following:

- PHA main administrative office
- PHA development management offices

Section 8

The PHA has not established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982.

Section 8 applicants or assisted families who desire to initiate the informal review and informal hearing process should contact the following:

- PHA main administrative office

Homeownership Programs

Public Housing

The PHA does not administer any homeownership programs for public housing.

Section 8 Tenant Based Assistance

The PHA does not plan to administer any homeownership programs for Section 8.

Community Service and Self-Sufficiency Programs *REVISION*

A. PHA Coordination with the Welfare (TANF) Agency.

1. The PHA has not entered into a cooperative agreement with the TANF Agency, to share information and /or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937.)
2. Other coordination efforts between the PHA and TANF agency include:
 - Client referrals
 - Information sharing regarding mutual clients (for rent determinations and otherwise)
 - Coordinate the provision of specific social and self-sufficiency services and programs to eligible families

B. Services and programs offered to residents and participants by the Housing Authority of the City of Lubbock are as follows:

(1) General

a. Self-Sufficiency Policies

The PHA will not employ discretionary policies to enhance the economic and social self-sufficiency of assisted families.

b. Economic and Social self-sufficiency programs

The PHA does not coordinate, promote or provide any policies or programs for the enhancement of the economic and social self-sufficiency of assisted families.

(2) Family Self Sufficiency Programs **REVISION**

Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants	Actual Number of Participants <i>(As of: 04/09/2020)</i>
Public Housing	0	1
Section 8	25	40

C. Welfare Benefit Reductions

The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination

D. Community Service Requirement

Pursuant to section 12(c) of the U. S. Housing Act of 1937, the PHA will comply with requirements of community service by identifying the number of tenants required to perform community service, the number of tenants granted exemptions, the number of tenants in non-compliance, and the number of tenants terminated/evicted due to non-compliance.

Description of the Community Service Policy

The Housing Authority of the City of Lubbock Community Service Policy is simple and definitive of Section 512 of the Quality and Work Responsibility Act of 1998. The Housing Authority of the City of Lubbock believes that the community service requirement should not be received by the resident to be a punitive or demeaning activity, but rather to be a rewarding activity that will benefit both the resident and the community.

Community service offers public housing residents and opportunity to contribute to the communities that support them while gaining work experience. The requirement is easy and rewarding and the Housing Authority provides the residents with the name of agencies, the agencies point of contact and all required paperwork necessary to accomplish the monthly service.

The Community Service Policy allows the PHA to identify those residents required to participate in the community service requirement. Participants will be required to contribute 8 hours of community service each month or to participate in a self-sufficiency program for 8 hours each month. Identified residents are responsible to determine the appropriateness of the voluntary service within guidelines provide in the policy. Allowed activities that may be included are listed in the policy. Voluntary political activities are prohibited from being considered to meet the Community Service requirement. Participation in self-sufficiency activities that may be included are listed in the policy. A list of exemptions that may be claimed from the requirement is provided in the policy. Family obligations and PHA obligations are addressed in detail. Lease requirements and documentation and non-compliance are all clearly addressed.

Administrative Steps Taken to Implement The Requirement

The following administrative steps were taken in implementing the PHA Community Service Policy. A written notification was sent to all residents regarding requirements on exempt status of each adult family member. Informed all residents that the program would be administered by the PHA, however; they are required to have their hours documented and signed by the agencies where they volunteered. Finally, that the volunteer sheet required for filing would be provided by the PHA. The PHA maintains a tracking log.

Programmatic Aspects Of The Requirements

Activities that the residents can participate in and receive community service credit are Reading Mentors, Library Assistant, Salvation Army Store Clerk or clothes or other items Sorter, Office filing, assisting with Kids after school and homework Helper. The following agencies assist the residents in accomplishing their community service, Independent School District, Salvation Army, Boys and Girls Clubs, YMCA and the City and School Libraries. For non-compliance with the Community Service Policy the PHA informed residents again of the requirements, then inform them of the consequences for non-compliance, i.e., grounds for eviction.

Community Service Implementation Report: REVISION

- Number of tenants required to perform community service: 76
- Number of tenants performing community service: 9
- Number of tenants granted exemptions: 216
- Number of tenants in non-compliance: 67
- Number of tenants terminated/evicted due to non-compliance: 0

Safety and Crime Prevention

The PHA's plan for safety and crime preventions to ensure the safety of the public housing residents is addressed below.

A. Need for measures to ensure the safety of public housing residents:

1. Description of the need for measures to ensure the safety of public housing residents.
 - Observed lower-level crime, vandalism and/or graffiti
2. Information or data used by the PHA to determine the need for PHA actions to improve safety of residents:
 - Resident reports
 - PHA employee reports
 - Due to staff and funding reductions, the PHA does not have an adequate system in place to measure safety. Resident reports and PHA employee reports are heavily relied on. Monitoring of developments currently being performed by management staff. This is on-going and no increase in activity has been noticed.
3. Developments that are most affected:
 - Cherry Point
 - Behner Place
 - 36 South
 - 96 West
 - The increase in crime is negligible in all developments to-date

B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year. **N/A**

C. Coordination between PHA and the police. **N/A**

Pet Policy

All residents are permitted to own and keep common domesticated household pets. Common household pet means a domesticated cat, dog, bird, gerbil, hamster, Guinea pig, and fish in aquariums.

Pet owners must agree to abide by the PHA's Pet Ownership Rules.

A non-refundable nominal pet fee of \$150.00 will be charged and is intended to cover the reasonable operating costs to the development directly attributed to a pet or pets in the unit (i.e. fumigation of a unit), excluding elderly/disabled residents.

A refundable pet deposit of \$150.00 will be assessed and is intended to cover additional costs not otherwise covered which are directly attributable to the pet's presence (i.e. damages to the unit, yard, fumigation of a unit, etc.), excluding elderly/disabled residents.

Limit of one pet per household.

Limit for birds is two (2).

Pet owner may have only a small cat or a small dog. Limitations: weight not to exceed twenty (20) pounds; height shall not exceed fifteen (15) inches. This does not apply to service animals that assist persons with disabilities.

Pet owner shall license their pet as required by law.

Pet owner must not violate any state or local health or humane laws.

Pet must be spayed or neutered.

Pet must be maintained on leash and kept under control when taken outside the unit.

Most Recent Fiscal Year Audit

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

Y N

If, yes, please describe: **N/A**

Asset Management

The PHA will conduct a Physical Needs Assessment (PNA) of all AMP's within the next fiscal year. The needs of the projects have been prioritized, not only based upon the PNA, but also upon needs identified during inspections performed by PHA staff and HUD REAC and during Energy Audits. A combination of these methods has determined the agency's long-term operating goals and serves as a guide in handling the agency's capital investments. The needs, as determined, will serve as the agency's guide towards developing a plan of action with regards to rehabilitation, demolition/disposition. The current plans for

modernization activities are included in the agency's Annual Statement and Five-Year Action Plan.

Substantial Deviation/Significant Amendment or Modification

Substantial Deviation

A substantial deviation may be defined as a loss and/or inadequate funding for a program, reallocation of funding to sustain programs and/or a change in regulatory requirements governing a program, thus requiring LHA to amend its agency plan. As part of the Rental Assistance Demonstration (RAD) and the Section 18 Disposition process, LHA excludes the following Section 18 and RAD-specific items:

- Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to Relocation Plan and processes for each approved RAD conversion;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion; and
- The decision to convert to either Project-Based Rental Assistance or Project-Based Voucher Assistance.
- Changes to the Section 18 Disposition Plan and/or application for units identified in this plan.

Significant Amendment/Modification

LHA will amend or modify its agency plan upon the occurrence of any of the following events during the first nine months of the term of an approved plan:

- A federal statutory or regulatory change is made effective and, in the opinion of the Authority, has either substantial programmatic or financial effects on the programs administered by the Authority, or creates substantial obligations or administrative burdens beyond the programs under administration at the start of the Plan year.
- Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals not already identified in this plan and those that are considered by HUD to be significant amendments to the Agency Plan and CFP 5 Year Action Plan.
- Any Capital Fund project not already in the Five-Year Action Plan excluding projects arising out of federally declared major disasters, acts of God beyond the control of the Authority, such as earthquakes, fire and storm damages, civil unrest, or other unforeseen significant event or changes in use of replacement reserve funds under the Capital Fund in the amount of 20% or more of the annual grant.
- Any other event that the Authority's Board determines to be a significant amendment or modification of the approved annual plan.

Violence Against Women Act (VAWA)

The Housing Authority of the City of Lubbock has incorporated in its PHA Plan goals and objectives, and policies and procedures the applicable provisions of the Violence Against Women and Reauthorization Act of 2005 (VAWA) to support or assist victims of domestic violence, dating violence, or stalking.

The PHA goal to provide an improved living environment is being met by the PHA by its effort to implement measures to assist victims of domestic violence in avoiding their abusers and continuing occupancy in public housing.

Notification has been sent to all Public Housing tenants, Section 8 participants and owners/landlords concerning VAWA and all new tenants are briefed at move-in. We are also utilizing an updated VAWA pamphlet.

Towards its effort to meet the PHA goal to promote self-sufficiency and asset development of assisted households the PHA is partnering with local agencies to provide or attract supportive services to assist victims of domestic violence move out of abusive situations and begin again. The PHA refers victims of domestic violence to the Women's Protective Shelter (which provides a variety of assistance) and the Child Protective Service (CPS).

In addition, the PHA has amended its policies and procedures to include language and applicable provisions of the VAWA. It is the PHA's intent to maintain compliance with all applicable requirements imposed by VAWA.

The PHA efforts may include to:

- Provide and maintain housing opportunities for victims of domestic violence, dating violence, or stalking (will allow a family who is a victim of domestic violence transfer to a different development);
- Create and maintain collaborative partnerships between PHA, victim service providers, law enforcement authorities, and other supportive groups to promote the safety and well-being of victims of domestic violence, dating violence, or stalking (whether actual or imminent threat) who are assisted by PHA;
- Ensure the physical safety of victims of domestic violence, dating violence, or stalking (whether actual or imminent threat) who are assisted by PHA; maintain compliance with all applicable requirements imposed by VAWA.
- Take appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting families or individuals assisted by PHA.

The Housing Authority of the City of Lubbock shall train its staff on the required confidentiality issues imposed by VAWA.

The Housing Authority of the City of Lubbock has adopted an Emergency VAWA Transfer Plan and provides it to applicants and residents/participants in accordance with HUD guidelines.

Hope VI or Choice Neighborhoods

The PHA has not received a HOPE VI revitalization grant.

The PHA does not plan to apply for a HOPE VI Revitalization grant in the Plan year.

Mixed Finance Modernization or Development

The PHA will be engaging in mixed-finance development activities for public housing in the Plan year. The PHA will try to help refinance a tax credit property and use RHF funds to make some units into public housing.

The PHA will not be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement.

Demolition and/or Disposition *REVISION*

The PHA does plan to conduct demolition or disposition activities in the plan Fiscal Year.

Demolition/Disposition Activity Description
1a. Development name: Cherry Point 1b. Development (project) number: AMP 021
2. Activity type: Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one) Approved <input checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved , submitted, or planned for submission: <u>03/08/2019</u>
5. Number of units affected: 72
6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <u>03/08/2019</u> b. Projected end date of activity: <u>09/27/2019</u>

Designated Housing for Elderly and Disabled Families

The PHA will be applying for the Elderly families designation for the 48 current Mary Myers units and the 12 expansion units as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year.

Conversion of Public Housing to Tenant Based Assistance

The PHA is not planning to convert any Public Housing to Tenant Based Assistance.

Conversion of Public Housing to Project-Based Assistance under RAD *(See attachment tx018c01)*

Occupancy by Over-Income Families REVISION

Significant Amendment to the PHA Plan: Public Housing Income Limit

Section 103 of the Housing Through Modernization Act of 2016 (HOTMA) amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a) to place an income limitation on public housing tenancy for families. The law requires the PHA to terminate assistance of over-income families.

After a family's income has exceeded 120% of the area median income (AMI) (or a different limitation established by the Secretary) for two consecutive years, the PHA must terminate the family's tenancy within 6 months of the second income determination or charge the family a monthly rent equal to the greater of (1) the applicable Fair Market Rent, or (2) the amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations.

Occupancy by Police Officers N/A

Non-Smoking Policies

EXHIBIT 8-1 SMOKE-FREE POLICY

Effective Date: October 1, 2017

In accordance with HUD regulations, the Housing Authority of Lubbock has adopted these smoke-free policies. The policies are effective as of October 1, 2017.

Due to the increased risk of fire, increased maintenance costs, and the known health effects of secondhand smoke, smoking is prohibited in all living units and interior areas, including but not limited to hallways, rental and administrative offices, community centers, day care centers, laundry centers, and similar structures. Smoking is also prohibited in outdoor areas within 25 feet from public housing and administrative office buildings.

This policy applies to all employees, residents, household members, guests, and service persons. Residents are responsible for ensuring that household members and guests comply with this rule.

The term "smoking" means any inhaling, exhaling, burning, or carrying any lighted cigar, cigarette, pipe, or other prohibited tobacco product in any manner or any form. Prohibited tobacco products include water pipes or hookahs.

Violation of the smoke-free policy constitutes a violation of the terms of the public housing lease. Consequences of lease violations include termination of tenancy.

PHA POLICIES

Designated Smoking Areas (DSA)

The PHA has not designated any smoking areas on the PHA's property. Residents may not discard smoking products on the property.

Electronic Nicotine Delivery Systems (ENDS)

Electronic nicotine delivery systems (ENDS) include e-cigarettes, nicotine inhalers, and vaping devices.

Use of ENDS is permitted in public housing units but prohibited in administrative buildings.

Effective Date

The PHA's effective date(s) of this smoke-free policy is/are as follows:

Example 1: The smoke-free policy will be effective for all residents, household members, employees, guests, and service persons October 1, 2017.

Enforcement

The PHA must enforce smoke-free policies when a resident violates this policy. When enforcing the lease, the PHA will provide due process and allow residents to exercise their right to an informal settlement and formal hearing.

The PHA will not evict a resident for a single incident of smoking in violation of this policy. As such, the PHA will implement a graduated enforcement framework that includes escalating warnings. Prior to pursuing eviction for violation of smoke-free policies, the PHA will take specific, progressive monitoring and enforcement actions, while at the same time educating tenants and providing smoking cessation information.

The lease will identify the actions that constitute a policy violation, quantify the number of documented, verified violations that warrant enforcement action, state any disciplinary actions that will be taken for persistent non-responsiveness or repeated noncompliance, and state how many instances on noncompliance will constitute a violation. Tenancy termination and eviction will be pursued only as a last resort.

The PHA may terminate tenancy at any time for violations of the lease and failure to otherwise fulfill household obligations if resident behavior disturbs other residents' peaceful

enjoyment and is not conducive to maintaining the property in a decent, safe, and sanitary condition.

As materials and services are available, the PHA will provide information and resources on smoking cessations.

If the resident does not exceed a total of three violations within 24 months, the resident will be considered to have a clear record.

Project-based Vouchers

The Housing Authority of the City of Lubbock intends to operate a Section 8 Project-Based Voucher Program.

Units with Approved Vacancies for Modernization N/A

Other Capital Grant Programs (i.e. Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). **N/A**

Mission

The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

Progress Statements – Progress the PHA has made in meeting the goals and objectives described in the 5-Year Plan

Goals and Objectives

PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #1:

- Acquire or build units or developments - RHF

Progress Statement: *In process of transitioning 72 units from Section 18 to PBV.*

PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING

The PHA established the following objectives to strive in meeting goal #2:

- Improve public housing management
- Improve voucher management
- Increase customer satisfaction
- Concentrate on efforts to improve specific management functions

- Renovate or modernize public housing units
- Provide replacement public housing

Progress Statement:

- *Working on intake and recert process to allow for mail or online process*
- *Continue to renovate our existing housing*
- *Disposed of 72 units in scattered site public housing*

PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES

The PHA established the following objectives to strive in meeting goal #3

- Provide voucher mobility counseling
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards

Progress Statement:

- *Letters were sent to Lubbock Apartment Association members to educate them on HCV*
- *Review payment standards every year*

PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT

The PHA established the following objectives to strive in meeting goal #4

- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments

Progress Statement: *Still working on this, exploring opportunities with development partners.*

PHA GOAL #5: ENSURE EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING

The PHA established the following objectives to strive in meeting goal #6

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

Progress Statement: *LHA continues to provide access to housing regardless of race, color, religion, national origin, sex, familial status or disability.*

Resident Advisory Board (RAB) Comments

Did the RAB(s) provide comments to the 5-Year PHA Plan? *(See attachment tx018a01)*

Y N

If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

- 1) Capital Improvements. Include a reference here to the most recent HUD approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.

See HUD Form 50075.2 approved by HUD on __/__/__

Challenged Elements – No Challenged Elements