5-Year PHA Plan
(for All 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, 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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

А.	PHA Information.						
A.1	PHA Name: <u>Arlin</u>	gton Housing	Authority	РНА С	ode: <u>MA048</u>		
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024 The Five-Year Period of the Plan (i.e. 2019-2023): FY 2025-2030 PHA Plan Submission Type: ∅ 5-Year Plan Submission						
	Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. The Public may view this PHA Plan, supporting documentation, and obtain information regarding any of the activities outlined in this plan at the Arlington Housing Authority's Administrative Office located at 4 Winslow Street, Arlington, MA 02474.						
	The proposed FY 2025 -	- 2030 Five Ye	ar plan is also available at <u>ww</u>	w.arlingtonhousing.org			
	The Arlington Housing Authority RAB board consists of all AHA HCVP participants. On April 19, 2024, all HCV participants were mailed notification of the Proposed Five-Year plan with information about how to find the remote access instructions for the virtual hearing, instructions about accessing the Plan, and instructions about how to comment on the Plan. A Public Hearing is scheduled for Wednesday, June 26, 2024, at 6:30 PM virtually. The Public Hearing will be an opportunity for the RAI Board (consisting of all HCVP participants) to voluntarily convene prior to amending the Annual or 5-Year Plan. Following the public meeting and Board vote, the AHA will submit the Plan including a summary or copy of written comments of the RAB.						
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	PH	Each Program HCV	
	Lead PHA:						

B.	Plan Elements. Required for <u>all</u> PHAs completing this form.					
B.1	Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.					
	The Arlington Housing Authority's mission is to provide adequate, affordable and safe housing opportunities to low, very low, and extremely low-income individuals and families through collaborative partnerships with community agencies and to manage Housing Authority finances in a fiscally responsible manner.					
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.					
	The Arlington Housing Authority presents the following quantifiable goals and objectives that will enable us to serve the needs of low-income families for the next five years:					
	• The AHA Section 8 Administrative Plan will be brought current with all changes (both required and discretionary) in accordance with Section 102 and 104 of HOTMA. These changes will take effect on January 1, 2025.					
	 Update and implement VAWA policies to comply with VAWA 2022 implementation guidance, set forth in the Federal Register January 4, 2023 which now includes victims of human trafficking. Continue to expand the supply of vouchers by maximizing our funding and achieving maximum utilization to help as many families as possible. To do so, the AHA will use HUD resources such as the 2-year forecasting tool to closely monitor program costs to maximize voucher utilization. Remain committed to affirmatively furthering fair housing to ensure equal opportunity regardless of race, national origin, ethnic origin, color, sex, religion, age, disability, familial status, marital status, ancestry, status as victim of domestic violence, dating violence or stalking, actual or perceived sexual orientation, gender identity, gender expression, pregnancy or source of income. We will work with landlords and our local bank to develop a direct deposit procedure. We continue to participate in the Massachusetts Centralized Waiting List administered by Massachusetts NAHRO chapter. We will continue to apply for new voucher allocations as appropriate and maximize utilization of existing funding. We will continue to pursue "High Performer" status under SEMAP by closely monitoring program performance through regular quality control reviews. We will ensure ongoing compliance with the Limited English Proficiency (LEP) policy. We will implement a Project Based Voucher program under the Section 8 program to expand the number of affordable units in Arlington. We will regularly assess the rent burden and success rates for our program participants to determine if payment standard amounts are in line with the local market. 					

B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.
	AHA has a history of meeting "high performer" status for the administration of the Section 8 program.
	The AHA continues to offer Section 8 families the opportunity to enroll in our highly successful Family Self-Sufficiency program. We continue to seek additional resources and local partnerships for this important program that supports participants in their goals related to economic independence.
	All AHA new hires are trained by available NAHRO or Nan McKay HCV trainings on eligibility, income and rent calculation, VAWA and MCAD Fair Housing Training. Additionally, staff regularly attend trainings through Section 8 Administrators Association.
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.
	The AHA's goal is to update and implement VAWA policies contained within the Administrative Plan to comply with VAWA 2022 implementation guidance, set forth in the Federal Register January 4, 2023 which now includes victims of human trafficking. The AHA complies with the requirements for applicant and participant notification of rights under VAWA and has established an emergency transfer plan for the HCVP program.
	The Arlington Housing Authority will continue to develop relationships with domestic violence victim advocates, legal aid services, and law enforcement agencies to ensure that victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking are provided the necessary support and resources they need.
C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
	A significant change or modification is defined as discretionary changes in the plan or policies of the housing authority that fundamental changes the mission, goals, objectives or plans of the agency which require the formal approval of the Board of Commissioners.
C.2	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the 5-Year PHA Plan?
	(b) 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.
C.3	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.4	Required Submission for HUD FO Review.		
	(a) Did the public challenge any elements of the Plan?		
	(b) If yes, include Challenged Elements.		
D.	Affirmatively Furthering Fair Housing (AFFH).		

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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:

D.1

Describe fair housing strategies and actions to achieve the goal

Until such time as the AHA is required to submit an AFH, the AHA will not have to complete this section. Nonetheless, on an ongoing basis the AHA commits to Affirmatively Further Fair Housing in all aspects of program operations. The AHA will ensure the fulfillment of Fair Housing requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015.

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Instructions for Preparation of Form HUD-50075-5Y - 5-Year PHA Plan for All PHAs

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

A.1 Include the full PHA Name, PHA Code, PHA Fiscal Year Beginning (MM/YYYY), Five-Year Period that the Plan covers, i.e. 2019-2023, PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. Plan Elements.

- **B.1 Mission.** State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR § 903.6(a)(1))
- **B.2** Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. (24 CFR § 903.6(b)(1))
- **B.3** Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR § 903.6(b)(2))
- **B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR § 903.6(a)(3)).

C. Other Document and/or Certification Requirements.

C.1 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year 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 2.

C.2 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB have comments?
- (b) If yes, submit 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 § 903.17(b), 24 CFR § 903.19)

C.3 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.4 Required Submission for HUD FO Review.

- Challenged Elements.
- (a) Did the public challenge any elements of the Plan?
- (b) If yes, include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

(Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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 PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low-income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average 1.64 hours per year per response or 8.2 hours per response every five years, 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.

Arlington Housing Authority Proposed HOTMA POLICY DECISIONS Expected Effective Date: 1/1/2025

1. **SELF-CERTIFICATION OF NET FAMILY ASSETS**: 24 CFR 5.603(b) "Net Family Assets" para. (2); 5.618(b)

The PHA will determine net family assets and anticipated income earned from assets at new admission and at recertification by fully verifying the information reported by the family, regardless of the family having assets that are equal to or less than \$50,000.

ASSET LIMITS: ASSET LIMITATION FOR INTERIM AND ANNUAL REEXAMINATION (24 CFR § 5.618

At admission, a family may not be assisted if they have \$100,000 or more in assets (including real estate) or real property ownership that is suitable for the applicant household to live in.

For participant families as of 1/1/2025, the PHA will not enforce the \$100,000 asset limit (including real estate) or real property ownership suitable for the family to live in. Families, however, must report all changes in income and assets and may be terminated for failure to disclose all assets and income fully.

2. **DETERMINING NET FAMILY ASSETS**: 24 CFR 5.603(b)(3) and (4)

The PHA will include the value of non-necessary items of personal property if the combined value exceeds \$50,000.

3. HARDSHIP EXEMPTIONS FOR HEALTH/MEDICAL CARE EXPENSES & REASONABLE ATTENDANT CARE & AUXILIARY APPARATUS EXPENSES 24 FR 5.611(c)(1) and 5.611(c)(2)

Phased-In Relief: The Health and Medical Care Expenses deduction will be capped at qualifying expenses in excess of 10% of annual income starting in 2025. The PHA will incrementally implement this policy for current participants with medical expenses. "Phased in Relief", will begin automatically as 5% in the first year; 7.5% for the second year and 10% for the third year.

General Relief: A family that did not have medical expenses prior to the implementation date may request a hardship exemption for 90 days, (deduction would be capped at qualifying expense in excess of 5% instead of 10%) for an unexpected increase in health or medical care expenses that the PHA will verify and approve.

4. HARDSHIP EXEMPTION TO CONTINUE CHILDCARE EXPENSES DEDUCTION: 24 CFR 5.611(a)(4)

The PHA may extend the childcare expense deduction for additional 90-day periods if the family demonstrates that they are unable to pay their rent because of loss of the childcare expense deduction, and the childcare expense is still necessary even though the family member is no longer employed, looking for work, or furthering his or her education

INTERIM REEXAMINATIONS: 24 CFR §§ 960.257(b)(6); 982.516(c)(4); and 882.515(b)(4) - (b)(5).

Families must report all changes in family income or household composition within 30 business days from the effective date of the change to be considered "timely."

6. **DECREASES IN INCOME:** 24 CFR §§ 960.257(b)(2); 982.516(c)(2); and 882.515(b)(2)

An interim reexamination will be conducted when the PHA is notified by the family that the family's adjusted income has decreased by any amount.

7. **INCREASES IN INCOME:** 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)

All families are required to report any changes in family income and assets. The PHA will not consider any increases in **earned income** when estimating or calculating whether the family's adjusted income has increased unless the family had a previous interim examination where the family's income, of any type, decreased during the same reexamination cycle.

8. AUTHORIZATION FOR THE RELEASE OF INFORMATION and REVOCATION OR CONSENT 24 CFR 5.230 and 24 CFR 5.232(c)

Applicants and participants must sign and submit the HUD-9886, as applicable, at admission and no later than the next interim or regularly scheduled income reexamination.

9. DE MINIMIS ERRORS 24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); and 882.808(i)(5)

Once the PHA becomes aware of the existence of an income calculation error, the error(s) will be corrected retroactively to the effective date of the action, regardless of the dollar amount associated with the error. The PHA will take corrective action to credit or repay a family if the family was overcharged tenant rent.

10. HUD'S ENTERPRISE INCOME VERIFICATION (EIV) 24 CFR 5.233

The PHA will use HUD's verification hierarchy when verifying each household's income, assets, deductions, and expenses. *The PHA* will access the EIV system and obtain an Income Report for each household during annual recertifications and interim re-examinations.

11. DETERMINATION OF INCOME USING OTHER MEANS-TESTED PUBLIC ASSISTANCE, I.E., "SAFE HARBOR" 24 CFR 5.609(c)(3)

The PHA **will not** accept income calculation information from other means-tested forms of federal public assistance.

12. SSN NUMBER REQUIREMENT

If a member of the family is unable to provide a Social Security card or other evidence of their SSN, the PHA will accept a document stating the person's name and a declaration stating 1) why they cannot obtain their Social Security card and 2) what their SSN is.

13. SYSTEM ZERO INCOME REVIEWS: 24 CFR § 5.609(b)(24)(vi); 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)

The PHA will continue to conduct zero-income reviews for zero-income families.

Additional Important Changes Under HOTMA

Calculation of Income — 24 CFR 5.609(c): For initial occupancy/assistance and interim reexaminations, the PHA must estimate the family income for the upcoming 12-month period using current income. For all annual reexaminations, the PHA must determine the family income for the previous 12-months unless using a streamlined income determination, taking into account any redetermination from an interim reexamination and any unaccounted-for income changes.

Mandatory deductions.

(1) \$480 for each dependent, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25.

(2) \$525 for any elderly family or disabled family, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25.

Non-HOTMA Changes to Administrative Plan

A. National Standards for the Physical Inspection of Real Estate (NSPIRE)

The new inspection standards that replace HQS called NSPIRE becomes effective October 1, 2024.

B. Repeal of the Earned Income Disregard

The EID allowed eligible families to have a portion of their earned income excluded from annual income for a maximum period of 24 consecutive months. The Earned Income Disregard (EID) will not apply to any family who is not eligible for and already participating in the disallowance as of December 31, 2023. Families who were receiving the EID benefit as of December 31, 2023, may continue to receive the full benefit until the remaining timeframe for an individual family's EID expires. Because the EID lasts up to 24 consecutive months, no family will still be receiving the EID benefit after December 31, 2025.