

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p> <b>PHA Name:</b> <u>Montgomery County Housing Authority</u> <b>PHA Code:</b> <u>PA012</u>  <b>PHA Type:</b> <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Sub-Standard PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>2024</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>550</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>3,025</u>  <b>Total Combined Units/Vouchers</b> <u>3,075</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> 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.         </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements
B.1	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>Plans have been previously submitted. However, in order to address deconcentration issues further, the Housing Choice Voucher Program (HCVP) continues to implement landlord trainings and forums.</p> <p>(c) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>HUD approved MCHA to hold Payment Standards at 120% for 2023 and going forward. Previous waivers from 2022 have ended for HCVP and Public Housing.</p> <p>The MCHA will update the Administrative Plan and the Admissions and Continued Occupancy Policy (ACOP) to reflect changes where required due to the Housing Opportunity Through Modernization Act (HOTMA) of 2016 final rule. These changes will go into effect December 31, 2024.</p> <p>HOTMA permits the MCHA to add discretionary policies to adopt permissive deductions, to delay asset limitation terminations or evictions and to extend the duration of certain financial hardship exemptions found in the regulations:</p> <ul style="list-style-type: none"> <li>• The MCHA does not plan to add any such discretionary policies and will not adopt permissive deductions.</li> </ul> <p>HOTMA requires the MCHA to define what constitutes a financial hardship exemption for health and medical care expenses. The MCHA's policy is the following:</p> <ul style="list-style-type: none"> <li>• The MCHA will consider that a family has a financial hardship if they demonstrate that their applicable expenses increased and exceed at least 5% but are less than 10% of the family's income and; <ul style="list-style-type: none"> <li>○ The family did not previously qualify for the phase in exemption when the increase in threshold rule went into effect.</li> </ul> </li> <li>• The MCHA will consider that the family has a financial hardship if they demonstrate that their applicable expenses exceed at least 5% but are less than 10% of the family's income and had a change in circumstance resulting in the financial hardship that would not otherwise trigger an interim reexamination such as: <ul style="list-style-type: none"> <li>○ decrease in excluded income,</li> <li>○ The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program,</li> <li>○ increase in expenses due to a death in the family, such as funeral expenses,</li> <li>○ increase in expenses due to the hospitalization/care of a family member not residing in assisted unit,</li> <li>○ other reasons determined by the MCHA to be a hardship to the family on a case-by-case basis.</li> </ul> </li> </ul> <p>HOTMA requires the MCHA to have an established policy for determining a family's inability to pay the rent if they request a child care hardship exemption. The MCHA's policy is the following:</p> <ul style="list-style-type: none"> <li>• If a family whose eligibility for the child care expense deduction is ending, they may request a financial hardship exemption if they can demonstrate that the child care expense is still necessary even though the family member is no longer employed or furthering their education and they are unable to pay their rent without the deduction. The MCHA will consider that the family's inability to pay the rent is evident if any of the following apply: <ul style="list-style-type: none"> <li>○ the family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program,</li> </ul> </li> </ul>

- the family will be terminated or evicted and the cause of the potential termination or eviction is due to the family's failure to pay rent or tenant-paid utilities,
- the family income has decreased because of changed family circumstances, including the loss of employment,
- there was a death in the family and funeral-related expenses have occurred or the loss of the family member's income or child support,
- other reasons determined by the MCHA to be a hardship to the family on a case-by-case basis.

HOTMA permits the MCHA to determine a family's pre-deduction income based on income determinations made by other federal or public assistance programs within the previous 12 months. The MCHA will use income from these sources when available.

The MCHA will establish the policy that the revocation of consent to access financial records by any family member 18 years or older will result in denial or termination of assistance or admission.

HOTMA requires that the MCHA conduct an interim reexamination if family adjusted income is estimated to have decreased by 10% or more (Standard Threshold) or may determine a threshold less than 10%. The MCHA will use the Standard Threshold.

The MCHA will establish the policy to conduct an interim reexamination if family's adjusted income is estimated to have increased by 10% or more. The MCHA may not consider earned income in estimating whether the adjusted income has increased unless the family had an interim reduction in the same certification period.

The MCHA chooses not to conduct interim reexamination for an increase in income that occurs in the last three months of a certification period.

**Additions to HCVP Administrative Plan:**

2022 Family Self Sufficiency Action Plan was approved by the Board of Directors on 10/13/22 and will be added to Administrative Plan pending HUD approval.

MCHA adopted the Administration of Emergency Housing Vouchers in collaboration with Montgomery County's Your Way Home Program and continues to lease those vouchers. MCHA has increased the number of preference points for Your Way Home vouchers in collaboration with the CoC and the Admin Plan will be updated.

**Additions to the PH ACOP:**

The MCHA has changed the schedule to write off debts from annually to quarterly.

**Significant Amendment/Modification:**

There will be modifications made to the approved 2023 Five Year Capital Fund Plan.

**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                                   |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Hope VI or Choice Neighborhoods.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Mixed Finance Modernization or Development.  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Demolition and/or Disposition.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Conversion of Public Housing to Tenant-Based Assistance.   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Over-Income Families.   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Occupancy by Police Officers.  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Non-Smoking Policies.  |

- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

The MCHA continues to explore Choice Neighborhoods, Hope IV, Mixed Finance Modernization or Development, Demolition and/or Disposition, Moderate Rehabilitation conversions, RAD or other possible federally supported conversions as it applies to its current portfolio and possible expansion.

**Mixed Finance Development, Conversion and /or Real Estate Ventures:**

The MCHA continues to evaluate its housing portfolio, and housing opportunities inside and outside its portfolio, to increase the housing options for low and very low income households throughout Montgomery County, PA. This may include the acquisition of land and/or buildings for future development. The MCHA is considering its next repositioning effort which may include the following, either individually or in some combination thereof: Bright Hope Estates, Bright Hope Manor, Golden Age Manor, Marshall Lee Towers, Sidney Pollock House and Robert P. Smith Towers.

The MCHA and/or its affiliate(s) is considering other ventures (real estate and otherwise) inside and outside its portfolio to create revenue generating opportunities in order to further support its mission. To the extent that the MCHA should need to partner with or procure a development partner to evaluate and/or accomplish these efforts, MCHA will do so in accordance with all relevant regulations. All actions, including, but not limited to, submitting applications for funding or for required approvals and/or allocation of MCHA’s financial/subsidy resources may be pursued subject to all relevant regulations, policies and procedures.

**Project Based Vouchers:**

The MCHA HCVP currently administers Project Based Vouchers as follows:

1. Jefferson School Project – Pottstown, PA – 23 units
2. Ardmore Crossing Project, Ardmore, PA – 53 units
3. Rittenhouse School Project – Norristown, PA - 44 units (these are project based Certificates)
4. Crest Manor, Willow Grove, PA - 16 units
5. North Hills Manor, Glenside, PA – 50 units

The owners of Norriswoods Apartments, a 42 unit Moderate Rehabilitation development currently assisted by MCHA, are in the application process of requesting these units be converted to Project Based Voucher units. The MCHA will be involved with this endeavor by supplying applicants from the HCVP Waiting list. This endeavor continues to be in process. The owners of Jefferson Apartments, privately owned and subsidized and located in West Norriton are in the application process of requesting some of the units be converted to Project Based Voucher units or TBV assistance. The MCHA is currently exploring joining this endeavor.

**Units With Approved Vacancies For Modernization:** Currently, vacant units in Bright Hope Manor, Golden Age Manor, Robert Smith Towers and Marshall Lee Towers are being placed in Modernization status to prepare for upcoming modernization work. Should the need to place other vacant units under modernization status over the next year arise, due to work related to modernization and /or development projects, MCHA plans to apply for this status.

**Applications:** The MCHA is considering applying and may apply to the following programs: HOPE VI/Choice Neighborhoods, Emergency Safety and Security Grants, VASH PBV, Family Self Sufficiency (FSS), Set Aside and Other Funding that may be offered comparable to what is included in Notice PIH 2018-9 and may re-apply for Mainstream Vouchers. The MCHA is exploring applying to the Moving to Work (MTW) program. The MCHA plans to apply to non-HUD/federal government funding as well. MCHA has applied for Foster Youth Initiative Vouchers and it is pending HUD’s response.

**Resident Opportunities and Self Sufficiency (ROSS) Grant Program:** The MCHA has received grant funding for a Resident Opportunities (ROSS) Service Coordinator. The position was filled with a qualified individual and the MCHA plans to re-apply for ROSS funding when this term is completed.

<b>B.3</b>	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>Refer to Progress Report in 2020-2024 Five Year Plan.</p>
<b>B.4</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>CFP 2024-2028 Five Year Plan and modifications to the CFP 2023 Five Year Plan were made available for public hearing and review during this Agency Plan process.</p> <p>CFP 2023-2027 Five Year Plan was HUD-approved on 3/3/23.</p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C. Other Document and/or Certification Requirements.</b>	
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(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.</p> <p>All residents were provided the opportunity make capital fund comments. These comments were reviewed by staff and incorporated into the final Capital Fund Plan. Additionally, resident advisory boards were provided the draft agency plan for comment.</p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>C.4</b>	<p><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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<b>C.5</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

**D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing (AFFH).**

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

<b>Fair Housing Goal:</b>
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>

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