

Annual PHA Plan <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

PHA Name: Montgomery County Housing AuthorityPHA Code: PA012

PHA Type: ☒ Standard PHA☐ Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2025

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

Number of Public Housing (PH) Units 550Number of Housing Choice Vouchers (HCVs) 3094

Total Combined Units/Vouchers 3644

PHA Plan Submission Type: ☒ Annual Submission☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

How the public can access this PHA Plan: PHA Plans and attachments are available for public inspection on the MCHA’s website at: www.montcoha.org

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV

B.	Plan Elements.
B.1	<div>Revision of Existing PHA Plan Elements.</div> <div>(a) Have the following PHA Plan elements been revised by the PHA?</div> <div><div><div>Y</div><div>N</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Statement of Housing Needs and Strategy for Addressing Housing Needs</div></div><div><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div><div>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Financial Resources.</div></div><div><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div><div>Rent Determination.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Operation and Management.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Grievance Procedures.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Homeownership Programs.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Community Service and Self-Sufficiency Programs.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Safety and Crime Prevention.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Pet Policy.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Asset Management.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Substantial Deviation.</div></div><div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div>Significant Amendment/Modification</div></div></div>

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
The MCHA has updated the Administrative Plan and the Admissions and Continued Occupancy Policy (ACOP) to reflect mandatory and discretionary policy changes where required due to the Housing Opportunity Through Modernization Act (HOTMA) of 2016 final rule. These changes will go into affect when the MCHA can implement full compliance (MCHA’s compliance date). Families are ineligible for Public Housing or Housing Choice Voucher assistance at admission if they have: • Net assets over \$100,000 • Real property suitable for occupancy that the family has ownership interest, legal right to reside in, and authority to sell. The MCHA requires that each family member above the age of 18 sign a HUD- 9886/A form to authorize the release of certain information to the MCHA on admission. At each annual or interim reexamination, the MCHA will determine if any family member turned 18 and has not yet signed the HUD-9886/A form. Such a family member will be required to sign the appropriate form at the reexamination. The executed consent form (Form HUD-9886/A) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the MCHA to revoke consent. Families have the right to revoke consent by notice to MCHA, however, revoking consent will result in termination or denial of assistance.

Rent Determination.
Changes resulting from HOTMA final rule: The MCHA will not enforce termination or eviction on any program participants who were assisted prior to the MCHA’s HOTMA compliance date who have net assets over \$100,000 or real property suitable for occupancy that the family has ownership interest, legal right to reside in, and authority to sell. Upon the MCHA’s HOTMA compliance date, existing participants will be able to self-certify assets valued at or below \$50,000. The MCHA defines a financial hardship exemption for health and medical care expenses (general relief) as the following: • If the family can demonstrate that their applicable expenses increased and exceed at least 5% but are less than 10% of the family’s income and; The family did not previously qualify for the phase in exemption when the increase in threshold rule went into effect. • If the family can demonstrate that their applicable expenses increased and 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: o decrease in excluded income, o The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program, o increase in expenses due to a death in the family, such as funeral expenses, o increase in expenses due to the hospitalization/care of a family member not residing in assisted unit, o other reasons determined by the MCHA to be a hardship to the family on a case-by-case basis. The MCHA will not consider more than two (2) consecutive requests for this hardship exemption. The MCHA defines a financial hardship exemption for child care expenses as the following: • If a family 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: o the family has lost eligibility for or is awaiting an eligibility determination for a federal, state, o 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, o the family income has decreased because of changed family circumstances, including the loss of employment, o 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, o other reasons determined by the MCHA to be a hardship to the family on a case-by-case basis. The MCHA will not consider more than one (1) request for this hardship exemption. The MCHA will conduct an interim reexamination if family's adjusted income is estimated to have increased or decreased by 10% or more. The MCHA will not consider earned income in estimating whether the adjusted income has increased unless the family had an interim reduction in the same certification period. • Calculated percentage decreases less than 10% will not be rounded up to the nearest whole number. • A 0% threshold applies when a decrease in family size results in a decrease in adjusted income. The MCHA will not conduct interim reexamination for an increase in income that occurs in the last three months of a certification period. The Mandatory Earned Income Disallowance (MEID) has been discontinued and removed from MCHA policies. Residents/Participants that are currently on the MEID prior to the MCHA's compliance date will continue the exclusion until their expiration date.

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

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

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.;

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

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|-------------------------------------|-------------------------------------|--|
| <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 type="checkbox"/> | <input checked="" 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. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 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

Hope VI or Choice Neighborhoods.

The MCHA continues to explore Choice Neighborhoods and Hope IV as it applies to its current portfolio and possible expansion.

Mixed Finance Modernization or Development.

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.

Demolition and/or Disposition.

The MCHA continues to explore Demolition and/or Disposition as it applies to its current portfolio.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.

The MCHA continues to explore Moderate Rehabilitation conversions, RAD or other possible federally supported conversions as it applies to its current portfolio and possible expansion.

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 maintaining Norriswoods PBV 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 finalizing a PBV Contract.

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.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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 and Foster Youth Initiative 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. 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.3

Progress Report.

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

The HCV Program has received awards for Mainstream, Emergency Housing, new VASH and Foster Youth Initiative vouchers. MCHA sought and received 120% payment standard approval from HUD. MCHA has received SEMAP bonuses over multiple years. Incremental Vouchers have been HUD approved and are presently being administered. MCHA had multiple Home Ownership closings. Family Self Sufficiency Action Plan has been HUD approved. MCHA consistently submits 50058's and has maintained PIC reporting scores of 95% or more. MCHA successfully utilizes the EIV System and actively investigates income discrepancies and brings them to resolution. The MCHA has received two

	<p>Federal Community Project Fund awards, with a third request pending. Funding is being used to tackle a large water infiltration problem at our Lee Towers development. MCHA has received an ARPA Recovery Grant, several PHARE awards and multiple CDBG awards which supplement many upcoming modernization projects. MCHA has received a Philanthropy PAHWF (Pottstown Area Health and Wellness Foundation) award being used for the renovation of our Bright Hope Community Play Spaces for the children’s enjoyment. MCHA obtained a HUD Security and Safety Grant for CO Detectors, Fobs and Cameras throughout our developments. MCHA has experienced multiple years of ‘clean’ Audits, only one non-financial finding in 2022. MCHA received only three findings during HUD’s Compliance Monitoring review in 2023 and review has been closed. Additionally, three Best Practices were noted.</p>
B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. CFP 2025-2029 Five Year Plan was made available for public hearing and review during this Agency Plan process. CFP 2024-2028 Five Year Plan is most recent HUD-approved Action Plan on 6/7/24.</p>
B.5	<p>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> (b) If yes, please describe: There was one non-financial finding related to the Housing Choice Voucher Program's HQS inspections. MCHA submitted a Corrective Action Plan to HUD on 10/13/23 in an effort to demonstrate increased oversight of the HQS internal controls. HUD accepted this plan of action and closed their review of any further Corrective Action Plan submissions by the Authority on 10/27/2023. MCHA continues to monitor HQS inspections through HUD’s PIC system to ensure accuracy and timeliness.</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y <input type="checkbox"/> N <input type="checkbox"/> (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>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL₃, <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>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</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>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>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.</p>