



NOTICE of AMENDMENTS TO THE HIGHLAND PARK HOUSING COMMISSION 2024 ANNUAL PLAN AND THE FIVE-YEAR PLAN (2024-2028)

The Highland Park Housing Commission (HPHC) 2024 Annual Plan and Five-Year Plan (2024-2028) is published as amended for a significant change in the planned development repositioning. HPHC submitted a Streamlined Voluntary Conversion (SVC) application to HUD in June 2024. The SVC was detailed in the Annual Plans and presented to the public and residents of HPHC. HUD notified HPHC of program changes which resulted in the removal of the SVC application and an invitation to consider applying through the HUD Small PHA RAD Blend Program.

The application for the Small PHA RAD Blend is expected to be submitted to HUD in the fourth quarter of 2024. The differences between the programs, SVC and RAD, have been presented to the residents of HPHC. The amendments to the Annual Plans will be presented to the HPHC Resident Advisory Board.

Public Comments can be made through the US Mail to Highland Park Housing Commission, 13725 John R, Highland Park, MI 48203, email Information@highlandparkhc.org. All comments must be received by 2:00pm November 14, 2024. A public hearing will be held at Downes Manor at 13724 John R, Highland Park MI 48203 on November 14, 2024 at 5:00.

HIGHLAND PARK HOUSING COMMISSION
13725 John R, Highland Park MI



Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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.
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A.1 PHA Name: Highland Park Housing Commission PHA Code: MI105
 PHA Type: Standard PHA Troubled PHA
 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/1/2024
 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
 Number of Public Housing (PH) Units 198 Number of Housing Choice Vouchers (HCVs) 0 Total Combined Units/Vouchers 0
 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. This plan is posted at the offices of HPHC in the Downes Manor building at 13725 John R. Street during normal business hours. This plan will also be posted on the City of Highland Park website <https://highlandparkmi.gov>.

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
Lead PHA:					

B.	Plan Elements				
<input type="checkbox"/> B <input type="checkbox"/> .1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" 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"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency 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"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>Per Resolution H2021.06.16c Affirmation and Recertification of the Definition of a Significant Amendment; Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans or policies of the HPHC, that fundamentally change the mission, goals, objectives or plans of the agency, and require formal approval of the Board of Commissioners.</p> <p>2023 Formation of an HPHC Non-Profit: The HPHC established a non-profit affiliate, the purpose of which may include activities such as own, acquire, finance, refinance, maintain, improve, operate, develop, construct, rehabilitate, manage, lease, provide supportive services to affordable housing for low income seniors and families, and if appropriate or desirable, sell or otherwise dispose of such housing. The board of the non-profit will consist of the members of the HPHC advisory committee or board, with appointments based on service on the HPHC advisory committee or board. Officers will initially consist of Co-Recovery Administrators and HPHC's ED.</p> <p><i>The purpose or purposes for which the corporation is formed are: The corporation is formed in accordance with the Michigan Nonprofit Corporations Act and is organized exclusively for charitable purposes in accordance with Section 501(c)(3) of the Internal Revenue Code, or any corresponding section of any future federal tax code. In accordance with such charitable purposes, the corporation may own, acquire, finance, refinance, maintain, improve, operate, develop, construct, rehabilitate, manage, lease, provide supportive services to affordable housing for low income seniors and families, and if appropriate or desirable, sell or otherwise dispose of such housing. Subject to the Nonprofit Corporations Act, and Section 501(c)(3), the corporation may engage in any and all manner of business in furtherance of such charitable purposes.</i></p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>				
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input checked="" type="checkbox"/> X Conversion of Public Housing to Tenant-Based Assistance. Removed due to change from SVC to Small PHA RAD Blend</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p>				

(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 following activities began in 2023 and will continue throughout 2024. At the time of this plan, HPHC is preparing the submission of a HUD ~~Streamlined Voluntary Conversion (see below)~~ Small PHA RAD Blend application. It is anticipated that at ~~9/1/2024~~, 12/31/2024 the ~~SVC~~ RAD Blend will be in place. The 2023 activity remained on the plan for clarification of activities.

Mixed Finance Modernization or Development – 2023/2024

- Mixed Finance Modernization: HPHC is pursuing ~~HUD's Streamlined Voluntary Conversion ("SVC")~~ HUD's Small PHA RAD (Rental Assistance Demonstration) Blend Program fitting the definition of Mixed Finance Modernization. Please see attached detailed repositioning plan in Exhibit A to include the following general directives: Up to 160 units and eight buildings repositioned through ~~HUD's Streamlined Voluntary Conversion Program~~ HUD's Small PHA RAD Blend Program to allow outside financing through Low Income Housing Tax Credits and MSHDA bond financing. This repositioning will generate over \$12MM for rehab to include upgrades to all buildings' exteriors and interiors. Residents will be offered more rental assistance options to include HUD Project-Based Vouchers ~~or Tenant Protection Vouchers~~, administered by MSHDA. Residents will still essentially pay 30% of the adjusted annual income towards rent. HPHC's non-profit will serve as a co-managing member with MHT Housing, Inc., a Michigan non-profit. The following units ~~may or may not be included in this SVC repositioning~~. (identified in 1 through 8. 160 count) will be including in the Small PHA RAD Blend repositioning.
 1. 13725 John R Street (5-Story Downes Manor building): 100 Units: 101, 102, 104, 105, 106, 108, 110, 201-212, 214, 215, 217-225, 301-312, 314,315, 317-325, 401-412, 414, 415, 417-425, 501-512, 514, 515, 517-725.
 2. 257 Tuxedo (3-Story Walk-Up): 16 Units: 101-104, 201-206, 301-306.
 3. 12810 Trumbull (3-Story Walk-Up): 17 Units: 101-104, 106, 201-206, 301-306.
 4. 260 West Grand (3-Story Walk-Up): 6 Units: 101, 102, 201, 202, 301, 302.
 5. E. Grand Townhomes: 9 Units: 37, 39, 41, 43, 45, 47, 49, 51, 53
 6. Hamilton Townhomes: 4 Units: 13552, 13554, 13556, 13558
 7. 2nd Avenue Townhomes: 4 Units: 13905, 13907, 13909, 13911
 8. 3rd Avenue Townhomes: 4 Units: 13904, 13906, 13908, 13910
- Application of not less than 38 units to include 36 single family homes and two duplexes for HUD's Demo/Dispo application. Initially, all parcels/units will be offered for sale. Those units not sold may be transferred to a land bank or demolished leaving vacant lots. The Faircloth authority will be preserved for future development. The few remaining residents will be provided tenant protection vouchers or encouraged to pursue other housing options. Twelve of these units have been contracted and funded for demolition with the vacant lots eventually being offered for sale under the demo/dispo application. The following units may or may not be included in the demo/dispo application:
 1. Single Family Homes: 119, 154 & 174 E. Buena Vista, 393 Louise, 126 & 166 Colorado, 111 Cortland, 234 Richton, 91 Florence, 346 Highland, 169 Grove, 93 Ford, 215 California, 134 Colorado, 233 Colorado, 58 Grove, 87 Grove, 186 Massachusetts, 198 Pasadena, 139 E Buena Vista, 305 Cortland, 169 Connecticut, 109 W. Grand, 191 W. Grand, 201 W. Grand, 319 Highland, 312 Moss, 182 Pasadena, 231 Pasadena, 242 Richton, 82 Sturtevant, 197 Winona, 52 Tuxedo and 94 Ford
 2. Duplexes: 169 Pasadena, 171 Pasadena, 93 Cortland, 95 Cortland
- It is anticipated that the disposition and demolition of the units identified may extend beyond 9/1/2024. The HPHC will remain in control of the assets until removed from inventory. Any proceeds will be applied to the cost to carry the assets and dispose of the asset. Revenue is to be applied toward new affordable housing opportunities in conjunction with the development partners and non-profit.
- HPHC and the non-profit will share the same board, appointed by the City of Highland Park's mayor and retain certain levels of ownership in all facets of the repositioning.

Demolition and/or Disposition – 2023- 2024

As part of portfolio repositioning, the PHA will pursue further demolition and disposition activities within the portfolio, beyond those already approved by HUD. The PHA is going pursue Demo/Dispo with respect to the scattered site repositioning. Initial plan remains to demolish 12 vacant single family homes approved by HUD in 2016. The balance of units will be potentially dispose/sold or demolished. As part of the demo/dispo process, all parcels and buildings will be offered for sale as-is for fair market value. Those units not sold may be offered to the local land bank. If parcels with buildings don't sell, they will be demolished.

Conversion of Public Housing to ~~Tenant-Based Assistance~~ Project Based Vouchers

As part of HPHC's pursuit of repositioning through Small PHA RAD Blend ~~or Streamlined Voluntary Conversion ("SVC")~~, transition from Section 9 subsidies to Section 8 ~~Project Based Vouchers~~ ~~Tenant-Based Assistance is scheduled, affording residents a viable and flexible rental assistance platform.~~

Conversion of Public Housing to Project-Based Assistance under ~~SVC~~ the RAD Blend in fourth quarter 2024

Through the ~~SVC~~ RAD Blend (noted above), the Public Housing subsidy structure will be converted to Project-Based Vouchers under an initial 20 year Housing Assistance Payment Contract. This activity is expected to be in place as ~~of 9/1/2024~~ of 12/31/2024.

	<p>Capital Grant Programs HPHC will not pursue any additional Capital Grant Money in 2024. The capital funds available through 2023 will be spent on approved activity, all allocated capital funds will be spent on the remaining a backlog of deferred maintenance, safety/security concerns, and unmet physical needs. The balance of Capital funds will be used to support expenses associated with managing (demo/dispo) the vacant Single Family Homes and Duplexes until removed from inventory.</p>
<p>B.3</p>	<p>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.</p> <p>The 5YP for FYE 9/2022 has been adopted and missions and goals similar to the ones outlined herein are being pursued. Notable progress has been made in HPHC being awarded \$7.8 MM in Emergency and Receivership grants as well as making available ~\$1MM in allocated capital funds from 2020-2023.</p> <p>Performance: HPHC addressed capital improvements throughout the portfolio (identified in the 5 YCAP and in the specific grant approvals) erasing the backlog of deferred capital items.</p> <p>HUD has taken possession of the PHA and made strides towards improving transparency, compliance, and sustainability at the PHA.</p> <p>Development: A property management agreement with Continental Management is expected to be renewed, which includes provisions to provide training opportunities to on-site administrative and maintenance staff. The results of the management presence has been improved occupancy, reduced TAR, managed work-orders and improved internal controls.</p>
<p>B.4</p>	<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.</p> <p>Please see attached and revised 5YCAP, approved April 19, 2023.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: The audit is for the period ending 9/30/22, two findings were identified. 10 Non-compliance with file information and internal controls</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</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. HPHC met with the RAB to review revisions to the 2023 Plan and discuss the proposes 2024 Plan.</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <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>
<p>C.3</p>	<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</i></p>

	<i>Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.</i>				
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 N <input type="checkbox"/> <input checked="" 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 N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>The PHA has a comprehensive Recovery Agreement in place, executed December 2018. Breach of the terms of this agreement led to a declaration of substantial default by HUD on 4/29/21, with HUD taking possession on 5/10/21. Co-Recovery Administrators are currently working to close out the Recovery Agreement and otherwise improve the status of the PHA.</p>				
D.	Affirmatively Furthering Fair Housing (AFFH).				
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> <table border="1" style="width: 100%;"> <tr> <td>Fair Housing Goal:</td> </tr> <tr> <td><i>Describe fair housing strategies and actions to achieve the goal</i></td> </tr> <tr> <td> <p>HPHC will follow the Fair Housing Strategies and practices recommended by the Fair Housing Center of Metropolitan Detroit. The HPHC is committed to affirmatively furthering fair housing. This includes participating in education with residents and staff.</p> </td> </tr> <tr> <td>Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<i>Describe fair housing strategies and actions to achieve the goal</i>	<p>HPHC will follow the Fair Housing Strategies and practices recommended by the Fair Housing Center of Metropolitan Detroit. The HPHC is committed to affirmatively furthering fair housing. This includes participating in education with residents and staff.</p>	Fair Housing Goal:
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Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

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

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(d)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(iii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(ii))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission; 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices](#).

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03](#). (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

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

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(o))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

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.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Highland Park Housing Commission</u> PHA Code: <u>MI105</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/1/2024</u> The Five-Year Period of the Plan (i.e. 2019-2023): <u>2024-2028</u> PHA Plan Submission Type: <input type="checkbox"/> 5-Year Plan Submission <input checked="" type="checkbox"/> Revised 5-Year Plan Submission 9/30/2024 Revised/Amended</p> <p>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.</p> <p><input type="checkbox"/> PHA Consortia: (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: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">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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		PH	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. See Narrative
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. See Narrative
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. See Narrative
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. See Narrative
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. See Narrative
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year 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 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.3	<p>Certification by State or Local Officials.</p> <p>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.</p>
C.4	<p>Required Submission for HUD FO Review.</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>(b) If yes, include Challenged Elements</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1

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.

<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>HPHC will follow the Fair Housing strategies and practices recommended by the Fair Housing Center of Metropolitan Detroit. The HPHC is committed to affirmatively furthering fair housing. This includes participating in education with staff and residents.</p>
<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>
<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>

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.

Fiscal Year (FY) 2024-2028 Five-Year Public Housing Agency (PHA) Plan
Highland Park Housing Commission, Highland Park MI
Amended

Narrative and Additional Information

A.1 The public may view the 2024 Amended 5-Year PHA Plan, supporting documentation, and obtain information regarding any of the activities outlined in the plan at HPHC's main office Downes Manor:

13725 John R, Highland Park, MI 48203

during the hours of 9:00am and 5:00pm on Monday, Tuesday, Thursday and Friday

Additional documents and supporting documents for this PHA Plan, are also available for viewing at the above location are listed below:

Form HUD 50077 ST: PHA Certification of Compliance with the PHA Plans and Related Regulations

Resident Advisory Board (RAB) Comments on the PHA Plan

Form HUD 50077- CR: Civil Rights Certifications

Form HUD 50077-SL: Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

The PHA Plan will also be available on the City of Highland Park's website:

www.highlandparkmi.gov

Staff meet with the Resident Advisory Board (RAB) on May 29, 2024, to discuss the PHA Plan and will provide any comments from the RAB

A public hearing regarding this PHA Plan will be held on July 17, 2024 at 5:00 p.m. in the Community Rooms at the Downes Manor, 13725 John R, Highland Park MI 48203

B.1. Mission

The Highland Park Housing Commission is committed to providing quality housing services to families and individuals with low and very-low incomes. Our goal is to help families and individuals advance to a lifestyle of stability and self-reliance, by offering safe,

affordable, and quality housing as well as community resources delivered through mission-aligned partnerships so that:

- Our residents are afforded quality housing;
- We strengthen families and the community as good neighbors;
- We establish an efficient and productive environment that fosters trust, open communication and mutual respect;
- We work with advocates and providers to maintain support all the work of the Commission

B.2. Goals and Objectives

In support of its mission, HPHC will engage in the following goals and objectives in the Public Housing program over the next five years. This includes the fiscal years 2024-2028.

HPHC anticipates repositioning the public housing portfolio ~~through HUD's Streamline Voluntary Conversion in the fourth quarter of 2024~~ through HUD's Small PHA RAD (Rental Assistance Demonstration) Blend program. 160 units will be financially restructured through Low Income Tax Credits, MSHDA bond financing and a Project-Based Voucher Contract. 38 long term vacant units (Single Family Homes and Duplexes) will be scheduled for disposition and demolition. The disposition or sale of the units is scheduled to be at Fair Market Value (FMR). If HPHC is unable to dispose or sale at the FMR, HPHC will work with HUD to consider additional options including selling below FMR levels and meeting affordability requirements.

With this conversion, HPHC will no longer have Capital Fund Program (CFP) supporting the 160 Public Housing Units in its' portfolio. Accordingly, HPHC anticipates limited activity related to the Public Program beyond fiscal year 2025.

The inventory/property addresses are:

13725 John R Street (5-Story Downes Manor building): 100 Units: 101, 102, 104, 105, 106, 108, 110, 201-212, 214, 215, 217-225, 301-312, 314,315, 317-325, 401-412, 414, 415, 417-425, 501-512, 514, 515, 517-725.

257 Tuxedo (3-Story Walk-Up): 16 Units: 101-104, 201-206, 301-306.

12810 Trumbull (3-Story Walk-Up): 17 Units: 101-104, 106, 201-206, 301-306.

260 West Grand (3-Story Walk-Up): 6 Units: 101, 102, 201, 202, 301, 302.

E. Grand Townhomes: 9 Units: 37, 39, 41, 43, 45, 47, 49, 51, 53

Hamilton Townhomes: 4 Units: 13552, 13554, 13556, 13558

2nd Avenue Townhomes: 4 Units: 13905, 13907, 13909, 13911

3rd Avenue Townhomes: 4 units: 13904, 13906, 13908, 13910

Single Family Homes: 119, 154 & 174 E. Buena Vista, 393 Louise, 126 & 166 Colorado, 111 Cortland, 234 Richton, 91 Florence, 346 Highland, 169 Grove, 93 Ford, 215 California, 134 Colorado, 233 Colorado, 58 Grove, 87 Grove, 186 Massachusetts, 198 Pasadena, 139 E Buena Vista, 305 Cortland, 169 Connecticut, 109 W. Grand, 191 W. Grand, 201 W. Grand, 319 Highland, 312 Moss, 182 Pasadena, 231 Pasadena, 242 Richton, 82 Sturtevant, 197 Winona, 52 Tuxedo and 94 Ford Duplexes: 169 Pasadena, 171 Pasadena, 93 Cortland, 95 Cortland

The sustainability of the Public Housing program is directly related to the sale (disposition) of the Single-Family Homes and Duplexes (structure and land). The Capital Fund Program and Operating Fund Balances (shortfall fees) will be used to manage the vacant assets and associated costs. Revenue from the sale of properties is expected to address expenses and may support replacement housing activities. Once the 38 units/land are removed from the HPHC portfolio there will be no HUD funds available.

2023 Formation of an HPHC Non-Profit: The HPHC established a non-profit affiliate, the purpose of which may include activities such as own, acquire, finance, refinance, maintain, improve, operate, develop, construct, rehabilitate, manage, lease, provide supportive services to affordable housing for low-income seniors and families, and if appropriate or desirable, sell or otherwise dispose of such housing. The board of the non-profit will consist of the members of the HPHC advisory committee or board, with appointments based on service on the HPHC advisory committee or board. Officers will initially consist of Co-Recovery Administrators and HPHC's ED.

The HPHC residents residing in the single family homes/duplexes are expected to receive HUD's Tenant Protection Vouchers through the demo/dispo program ~~of HPHC will receive rental assistance through HUD's Tenant Protection Vouchers~~ or the HPHC residents impacted by the Small PHA RAD Blend will receive Project-Based Vouchers managed by MSHDA under a HAP contract with the new owner entity. ~~Outlined in the 2023 Annual Plan is the resident rights to Tenant Protection Vouchers and the~~ The contracting of the units to Project-Based Vouchers is a key component of the RAD transaction.

Future development activities: replacement housing , specifically the 38 units of single family homes/duplexes ~~including the~~ available use of Fair Cloth will be structured in conjunction with the HPHC, the current development partner (MHT Housing, Inc.), the non-profit and the city of Highland Park. The specific plan is not outlined at this time.

B.3. Progress Report

Beginning in FY 2019 HPHC began to undergo management, operational and restructuring. A Recovery Agreement between HPHC and HUD (dated December 11, 2018) required HPHC to pursue restructuring of the housing commission. May 8, 2020 HUD selected Continental Management as the full-service Property Management at HPHC. On April 29, 2021, HUD took receivership of the housing commission. On September 1, 2023, MHT Housing Inc., was chosen as the development partner to assist HUD with the repositioning.

To date the following as been accomplished:

HPHC was awarded \$7.8 Million in Emergency and Receivership Capital Funds
HPHC reconciled \$1MM in Capital Fund Program allocations
Management has met the program obligation and spending requirements of the capital funds.

The fund allocation is outlined in the Five-Year Capital Action Plan and based on specific emergency capital needs. Structural repairs include, but are not limited to: new roofs, new elevators, new security systems (lights, intercom), parking lots, balconies, trash compactor.

Management is on site and has structured operations to improve customer service, through response time and awareness of systems. Resident engagement has evolved to include a viable Resident Advisory Board and strong community engagement in the redevelopment process throughout the portfolio.

Although HPHC remains under HUD control and is ranked Troubled the key performance indicators show continuous improvement:

Work orders are addressed timely, with emergency items addressed within 24 hours.
Occupancy levels reach 90% (leasing levels and waiting list applicant levels were low during the pandemic, adversely affecting occupancy and timing recertifications)
Tenant Accounts Receivables have been reduced
Tenant Debt is managed with repayment agreements managed

Unit occupancy has been right sized to occupancy standards
 File Reviews and Wait list management meet compliance requirements
 Accounts Payables are current and within budget expectations

B.4 Violence Against Women Act (VAWA) Goals.

Applicants who otherwise qualify for assistance or admission will not be denied admission on the basis that the applicant is or have been a victim of domestic violence, dating violence, sexual assault or stalking. VAWA does not limit HPHC’s authority to deny assistance to an individual or family that is not otherwise qualified or eligible for assistance.

Prohibition Against Termination of Assistance Related to Victims of Domestic Violence, Dating Violence, Stalking or sexual assault Criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a participant’s household or any affiliated individual will not be the basis for termination of assistance, tenancy, or occupancy rights if the participant or an immediate member of the participant’s family is the victim or threatened victim of domestic violence, dating violence, sexual assault or stalking. Incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking will not be construed either as serious or repeated violations of the program obligations by the victim of such violence or as a good cause for terminating assistance. Notwithstanding the foregoing, HPHC may exercise its authority to, remove, terminate occupancy rights, or terminate assistance to any individual who is a household member or lawful occupant and who engages in criminal acts of physical violence against family members or others, without removing/terminating the assistance to, or otherwise penalizing the victim of such violence. HPHC retains its authority to terminate the assistance of any household member if HPHC concludes that there is an actual and imminent threat to other residents or those employed at or providing services to the property if the participant/household member is not evicted or terminated from assistance

HPHC’s VAWA Policy incorporates and explains the Commission’s use of the following four HUD documents required as per the VAWA 2013 Final Rule:

- Notice of Occupancy Rights under the Violence Against Women Act;
- Model Emergency Transfer Plan for Victims of Domestic Violence;
- Certification of Domestic Violence; and
- Emergency Transfer Request for Victims of Domestic Violence.

B. 5 Significant Amendment or Modification.

If certain situations or priorities necessitate actions due to health, safety, new regulations, changing regulatory or local, state or federal ordinance changes, which would represent a substantial departure from the stated mission goals, objectives, time frames or existing policies as set forth in the last approved 5-Year Plan, HPHC will make available and solicit resident review and input prior to pursuing amendments that would implement substantial changes. Development of subsequent Annual Plans shall be a vehicle through which updates and minor or routine modifications to the plan are made. Annually HPHC will review its progress toward the achievement of its goals and objectives and the existing policies and procedures, adequately addressing the needs of its constituents, stakeholders and the agency. To the extent that those needs are not met by the elements of the existing plan, the subsequent Annual Plan shall be written to reflect changes to goals, objectives, policies and procedures to address those needs. In the event that the elements of the subsequent annual plan represent a significant departure from those of the existing plan, a Significant Amendment or Modification to the plan will be undertaken. Under these circumstances, a full and participatory planning process will be used to obtain resident and stakeholder input. A draft of the substantially modified plan will be subject to the public review, comment, and hearing process.

~~As part of the Streamline Voluntary Conversion (SVC);~~ As part of the Small PHA RAD Blend the HPHC is redefining the definition of a substantial deviation from the PHA Plan to exclude the following ~~SVC~~ RAD Blend specific items:

- Changes to the construction and rehabilitation plans in the demo/dispo
- Changes to the financing structure for disposition and demolition (HUD Section 18) of 38 Single Family Homes and Duplexes

B.6 Resident Advisory Board (RAB) Comments

To be included

B.7 Certification by State or Local Officials

To be included