

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
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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, 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	PHA Name: <u>Highland Park Housing Commission</u> PHA Code: <u>MI105</u>					
	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 checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission					
<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>						
<input type="checkbox"/> 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	
Lead PHA:					PH	HCV

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><u>Form HUD-50077-SL</u>, <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.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 type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>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.)</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> <div data-bbox="217 636 1487 1021"> <p>Fair Housing Goal:</p> <p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></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> </div> <div data-bbox="217 1048 1487 1429"> <p>Fair Housing Goal:</p> <p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> </div> <div data-bbox="217 1456 1487 1841"> <p>Fair Housing Goal:</p> <p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> </div>

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 Draft Public Housing Agency (PHA) Plan
Highland Park Housing Commission, Highland Park MI

Narrative and Additional Information

A.1 The public may view the 2024 Draft 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 draft 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. 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: 13095, 13907, 13090, 13911

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 residents of HPHC will receive rental assistance through HUD's Tenant Protection Vouchers or 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 contracting of the units to Project-Based Vouchers.

Future development activities: replacement housing including the 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 xx 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 has 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), the HPHC is redefining the definition of a substantial deviation from the PHA Plan to exclude the following SVC specific items:

- Changes to the construction and rehabilitation plans in the demo/dispo
- Changes to the financing structure for disposition and demolition 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