# PHA 5-Year and Annual Plan

# U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB No. 2577-0226 Expires 4/30/2011

1.0	PHA Information PHA Name: Garfield County Housin	g Authority_		РНА С	ode:CO	095	
	PHA Type: Small High PHA Fiscal Year Beginning: (MM/YYYY):	Performing	☐ Standard	☐ HCV (Section 8)			
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above)  Number of PH units: None Number of HCV units: 434						
3.0	Submission Type  ☐ 5-Year and Annual Plan ☐ Annual Plan Only ☐ 5-Year Plan Only						
4.0	PHA Consortia: (Check box if submitting a joint Plan and complete table below.)						
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Unit Program PH	s in Each	
	PHA 1:				FII	TICV	
	PHA 2: PHA 3:						
5.0		lv. at 5 Vaan I	Dlam sumdata				
<i>5</i> 1	5-Year Plan. Complete items 5.1 and 5.2 on Mission. State the PHA's Mission for serving	•	1	4		TT A ? -	
5.1	jurisdiction for the next five years:	ng the needs t	of low-income, very low-income	, and extremely low income la	milies in the P	на s	
	For 2015-2020 Garfield County Housing Auth					Contlo	
	opportunities as they strive to achieve self-surental or purchase of appropriate housing; to						
5.2	Goals and Objectives. Identify the PHA's of	quantifiable g	oals and objectives that will ena	ble the PHA to serve the needs	s of low-incom	e and very	
	low-income, and extremely low-income fam and objectives described in the previous 5-Y		ext five years. Include a report of	on the progress the PHA has m	nade in meeting	g the goals	
	Goals and Objectives 2015-2019						
	1) Continue SEMAP rating of high performer						
	<ul> <li>2) Continue good management practices to ensure optimal lease-ups / funding available</li> <li>3) Continue good practices of rent integrity</li> </ul>						
	4) Implement a rehab program with 2015grant money for a minimum of two houses with a goal of completing continuing to grow the program.						
	5) Partner with private developers as opportunities occur. Potential projects currently include: 1) a low-income housing project in Rifle, 2) a New Castle senior LIHTC project, and a potential acquisition/rehab project in Parachute.						
	6) Continue and grow the down payment assistance program for low and moderate-income families and integrate it into a						
	homebuyer education and fore	closure preve	ention counseling program.				
	Progress on goals from 2010-2014						
	<ol> <li>Although GCHA was ranked as a standard performer in 2012, we re-gained the High-Performer status in 2013 and anticipate a perfect SEMAP score again in 2014.</li> </ol>						
	<ol> <li>We are continuing good management practices to ensure optimal lease-ups per our funding available (thank you for the HUD forecasting tool.)</li> </ol>						
	<ul> <li>We have continued good practices of rent integrity and we are working with HUD to identify an exception area so that we can maintain our rent integrity going forward.</li> </ul>						
	4) We have executed a contract to accomplish rehab projects by partnering with a local grant recipient.						
	, , , , , , , , , , , , , , , , , , , ,		3 units of a 60-unit LIHTC Glenw ts for very low income families.	ood Springs in 2014. We also	partnered with	n Habitat for	
	PHA Plan Update						
	(a) Identify all PHA Plan elements that have	e been revise	d by the PHA since its last Annu	al Plan submission:			
	We project-based 8 vouchers at a senior						
6.0	unit senior project in Parachute. We also completion and sale of the homes to low						
	additional counties and to provide State F	lousing Vouc	hers which are for homeless and	d mentally ill applicants.			
	(b) Identify the specific location(s) where the		obtain copies of the 5-Year and	Annual PHA Plan. For a com	plete list of PH	IA Plan	
	elements, see Section 6.0 of the instructions.  Copies of the Five Year Plan for the Garfield County Housing Authority are available for review at the Administration Office located at 1430						
	Railroad Ave. Unit F, Rifle, CO 81650, they may also be obtained by phone at 970-625-3589 and will be posted to our website at						
	www.garfieldhousing.com upon approval fro	om HUD.					

7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable. Garfield County H.A. has project-based vouchers in several communities in Garfield County. GCHA placed 8 Vouchers in a 40-unit assisted/independent living residence in Parachute, and one (1) voucher with permission from HUD in a 12-unit Disabled/Senior property also in Parachute. GCHA has also placed 20 vouchers in the Silt Senior Housing apartment project owned and located in the Town of Silt. In 2014 GCHA project-based 13 vouchers in a new 60-unit multifamily LIHTC project located in Glenwood Springs, CO.  We are currently working to partner on a 37-unit senior LIHTC project in the Town of Newcastle (8 PBVs) and the Roaring Fork School District for a 42-unit multifamily project in the Town of Carbondale (8 PBVs). These proposed developments will bring the total GCHA PBVs to 45. With 434 HCVs, these 45 PBVs will equal 10% of the available vouchers.  The entire HCV staff will attend Nan McKay PBV training the first half of 2015.			
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. Not applicable			
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1, for each current and open CFP grant and CFFP financing. Not applicable			
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the Capital Fund Program Five-Year Action Plan, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. Not applicable			
8.3	Capital Fund Financing Program (CFFP).  Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. Not applicable			

Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The following Garfield County housing data was provided by American Community Survey on the U.S Census Bureau's web site:

HOUSING OCCUPANCY	
	22.226
Total housing units	23,226
Occupied housing units	20,114
Vacant housing units	3,112
Homeowner vacancy rate	0.7
Rental vacancy rate	9.5
UNITS IN STRUCTURE	
Total housing units	23,226
1-unit, detached	13,914
1-unit, attached	2,021
2 units	922
3 or 4 units	1,201
5 to 9 units	1,166
10 to 19 units	860
20 or more units	908
Mobile home	2,197
Boat, RV, van, etc.	37
HOUSING TENURE	
Occupied housing units	20,114
Owner-occupied	12,516
Renter-occupied	7,598
Average household size of owner-occupied unit	2.77
Average household size of renter-occupied unit	2.76

Occupied housing units	20,114
Lacking complete plumbing facilities	296
Lacking complete kitchen facilities	120
No telephone service available	445
OCCUPANTS PER ROOM	
Occupied housing units	20,114
1.00 or less	19,211
1.01 to 1.50	729
1.51 or more	174
GROSS RENT	
Occupied units paying rent	7,344
Less than \$200	0
\$200 to \$299	73
\$300 to \$499	240
\$500 to \$495	799
\$750 to \$999	2,095
\$1,000 to \$1,499	2,604
\$1,500 or more	
	1,533
Median (dollars)	1,088
No rent paid	254
GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME	
Occupied units paying rent (excluding units where GRAPI cannot be computed)	7,223
Less than 15.0 percent	356
15.0 to 19.9 percent	640
20.0 to 24.9 percent	1,072
25.0 to 29.9 percent	983
30.0 to 34.9 percent	1,040
35.0 percent or more	3,132

**Characteristics of GCHA Waiting List** 

HCV	# of households	% of total households	
Waiting list total	427	100%	
Housed data			
Extremely low income <=30% AMI	389	91%	
Very low income (>30% but <=50% AMI)	0	0%	
Low income (>50% but <80% AMI)	5	1%	
Families with children	205	48%	
Elderly and/or Disabled	147	34%	
Race/ethnicity - WHITE	396	93%	
Race/ethnicity – HISPANIC	88	21%	
Race/ethnicity – BLACK	14	3%	
Race/ethnicity – ASIAN/AMERICAN INDIAN	12	3%	
Other	5	1%	
Female	324	76%	
Male	103	24%	

9.1 Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

Continue to partner with affordable housing developers to build additional units for low and moderate income families, elderly and special needs Continue to participate with local agencies in addressing the housing needs of the community

Continue to administer the Down Payment Assistance Programs to transition families into home ownership

Continue to seek additional funding through grants to increase affordable housing stock and make USDA RD property upgrades.

Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

GCHA has met all of our goals in our previous Five Year Plan. We have focused on our administrative policies and procedure to re-gain the High-Performer status in 2013 and prepare for perfect SEMAP score again in 2014.

10.0 We partnered with a developer to complete an additional 30 LIHTC units in 2014. We took over the State DOH Down Payment Assistance program from the failed MRHC to keep those resources available to low income families our community. Through MOU's we offer homebuyer and foreclosure counseling and we will be expanding our low-income home rehab program in 2015. We will be working with Rural Development to rehab a 12 unit senior/disabled property with a USDA grant. We will also be working with the School District, the Town of Carbondale and other local entities to build 40 affordable rental units.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

SIGNIFICANT AMENDMENT- Essentially, a <u>Substantial Amendment/Modification</u> is any action which departs from the primary mission of the Housing Authority and requires Board authorization.

SUSTANTIAL DEVIATION/MODIFICATION - Essentially, a <u>Substantial Deviation</u> is any action that requires a change in direction, course of action, or a major revision of the goals of the Housing Authority.

- 11.0 Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.
  - (a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations (which includes all certifications relating to Civil Rights) Attached
  - (b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only) N/A
  - (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only) N/A
  - (d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only) N/A
  - (e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only) N/A
  - (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. Agendas, minutes and public hearing notices attached. No comments were received.
  - (g) Challenged Elements N/A
  - (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only) N/A
  - (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only) N/A

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 5-Year and Annual PHA Plans. 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 and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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

# **Instructions form HUD-50075**

**Applicability**. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

#### 1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

#### 2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

### 3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

#### 4.0 PHA Consortia

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

#### 5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

- **5.1 Mission**. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.
- **5.2** Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.
- 6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:
  - (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
  - (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

 Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures. Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

- 2. 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.
- Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
- 4. Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance 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.
- Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
- 6. Designated Housing for Elderly and Disabled Families. With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall 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, and; 5) the number of units affected.
- 7. Community Service and Self-Sufficiency. A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).
- 8. Safety and Crime Prevention. For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (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.

- Pets. A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public
- 10. Civil Rights Certification. A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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.
- 11. Fiscal Year Audit. The results of the most recent fiscal year audit for the PHA.
- 12. Asset Management. A statement of 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.
- 13. Violence Against Women Act (VAWA). 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.
- Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers
  - Hope VI or 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 HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at:
    - http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm
  - (b) Demolition and/or Disposition. With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (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; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/demo\_dispo/index.c

Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.

Conversion of Public Housing. With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter 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

- (d) Homeownership. A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) Project-based Vouchers. If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.
- 8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.
  - Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the Capital Fund Program Annual Statement/Performance and Evaluation Report (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:
    - (a) To submit the initial budget for a new grant or CFFP;
    - (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
    - To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the Capital Fund Program Annual Statement/Performance and Evaluation (form HUD-50075.1), at the following times:

- At the end of the program year; until the program is completed or all funds are expended;
- When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
- Upon completion or termination of the activities funded in a specific capital fund program year.

## 8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the Capital Fund Program Five-Year Action Plan (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

- portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:
- http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm
- 9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
  - 9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- **10.0** Additional Information. Describe the following, as well as any additional information requested by HUD:
  - (a) Progress in Meeting Mission and Goals. PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
  - (b) Significant Amendment and Substantial Deviation/Modification. PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).
- 11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.
  - (a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations
  - (b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)
  - (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
  - (d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only)
  - (e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)
  - (f) Resident Advisory Board (RAB) comments.
  - (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
  - (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.
  - (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.