

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: 02/29/2016
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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. 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>Helena Housing Authority</u> PHA Code: <u>MT-004</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2020</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</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>The PHA Plan was publicly advertised in the local newspaper and at HHA offices and housing sites , and posted on the Helena Housing Authority website at: www.hhamt.org</p> <p>Copies of these documents are available for public review and inspection from 8:30 am to 4:30 pm Monday through Fridays at the HHA Administrative Office located at 812 Abbey Street, Helena, MT 59601. The HHA Residents' Management Council will hold a Council meeting on March 9, and April 13, 2020 at 6:00 PM at the HHA M.E. Anderson Building lobby, 100 South Warren Street, Helena, MT to review and discuss proposed changes and revisions, and to make comments and recommendations to the final plan. A public hearing will be held at the HHA Administrative Office at 812 Abbey Street, Helena, MT on April 7, 2020 at 3:00 p.m. to review the proposed changes and revisions and allow for comment. Written comments will be received through April 9, 2020 at 4:30 PM at the HHA Administrative Office. The Helena Housing Authority Board of Commissioners will hold a public meeting to take public comment and approve final changes and revisions on April 14, 2020 at 4:15 p.m. at the HHA Administrative Office.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.
B.1	<p>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. Provide quality affordable housing for eligible neighbors in the Helena community and promote opportunities to enhance life skills and personal achievement.</p>
B.2	<p>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.</p> <p>Goal 1 : Maximize Affordable Housing Opportunities for the Helena Community</p> <ul style="list-style-type: none"> a. HHA will develop and implement a public housing repositioning strategy utilizing RAD, Voluntary Conversion, and/or Demo Dispo options in order to preserve and rehabilitate HHA’s existing 366 units of public housing. Replacement of units will be pursued when necessary and cost effective. HHA will continue to perform modernization and rehabilitation to ensure quality housing. HHA’s rehabilitation and preservation and/or replacement efforts will focus on improving physical accessibility, health and safety, energy and resource efficiency, and long-term operational efficiency and sustainability, while protecting the rights of residents. b. HHA will work to fully maximize utilization of its HCV and other VASH and PSH voucher programs including project-basing vouchers where appropriate. HHA will apply for additional vouchers when HHA is eligible and competitive. c. HHA will continue to seek opportunities to increase the supply of affordable housing units and resources both directly and in partnership and support of other community efforts. <p>Goal 2: Promote and Secure Services for Housing Authority Residents, Participants, and Applicants</p> <ul style="list-style-type: none"> a. HHA will maintain service partnerships providing childcare and child development, along with job training and career skill building. b. HHA will seek to develop service partnerships to better meet the needs of seniors, persons with disabilities, and families. Service partnerships may include healthcare, disability services, senior services, educational services, nutrition and food security, domestic violence prevention and healthy relationships, resident safety, crime prevention, and other efforts to promote resident stability and success in community living and self-sufficiency. c. HHA will develop Permanent Supportive Housing Initiatives to meet the housing and service needs of persons and families who are homeless or unstably housed. <p>Goal 3: Utilize Housing Authority Resources in a Fiscally Responsible, Legal, Ethical, Coordinated, and Results Oriented Fashion</p> <ul style="list-style-type: none"> a. HHA will meet and exceed all legal and ethical standards of fiscal and operational management responsibility. b. HHA will work to maximize its resources to best meet the needs of its residents/program participants and the Helena community overall. c. HHA will ensure equal opportunity for all in all of its operations and programs. d. HHA will strive to attract and retain the highest quality employees with competitive pay and benefits, appropriate training , and fostering a supportive and welcoming work environment to best serve our residents, program participants, and community.

B.3

Progress Report.

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

Goal 1 Progress: Maximize Affordable Housing Opportunities for the Community

HHA remains actively engaged with community partners to maximize the utilization and pursuit of local, state, and funding in advancement of local affordable housing needs. HHA actively supported LIHTC, HOME, CDBG, and Housing Trust fund successful applications for Helena area RMDC development Red Alder now under construction which will provide 85 new units of affordable housing. RMDC worked with HHA to match the unit bedroom types with the HHA HCV waiting list, and when the units are completed in late 2020 will boost HCV participants' ability to use their vouchers. HHA also supported the successful LIHTC application for the preservation/rehabilitation of the formerly known as Serendipity-now Fire Tower apartments in downtown Helena. HHA took on administering upwards of 50 plus VASH vouchers for the state of Montana, and HHA added the administration of 42 Project based VASH vouchers at the Fort Harrison Freedom Path project being completed in phases during 2020. HHA plays an active role in the local Homeless Coordinated Entry Referral and Case Conferencing process to support linking housing and other resources like the HHA PSH program to those homeless persons and families with the greatest needs. HHA is encouraging full participation in the updated local and state Homeless Management Information System to increase coordination of resources. HHA is leading with St. Peter's Health, and the local United Way an effort with dozens of community partners on a "Housing is Healthcare" project to develop cross-systems data sharing to identify high utilizers of community services who are homeless or unstably housed to lead to the development of additional supportive housing resources in our area. Phase II of this project will get underway in 2020 to develop both housing and support service plans to expand permanent supportive housing options in our community. HHA has supported recent efforts by the City of Helena to adopt measures to support affordable housing including the waiving of certain fees related to the development affordable housing, allowing for greater density of housing in all zones, and raising height restrictions in certain zones. HHA is also working with the City of Helena to create a Tax Increment Finance District (TIF) including the HHA Stewart Homes 132 unit campus which would create a funding source for infrastructure and other improvements, as well as an effort to realign streets near its ME Anderson 76 unit building which could provide HHA additional land at the site for additional development. HHA Executive Director (ED) chairs a county board helping shape local county homeless funding policies to better meet homeless needs in the community. ED continues to serve on the Montana Statewide Homeless Continuum of Care Board of Directors. The ED also serves on the NeighborWorks Montana Board of Directors that works through a statewide network of affordable housing providers to develop additional resources in support of housing needs in communities across Montana. The ED is part of the Executive Board of the Montana Housing Coalition advocating on affordable housing issues here in Montana. HHA staff are working collaboratively with social service providers to better address and resolve housing challenges especially for residents with special needs including the elderly and disabled to help prevent evictions and to support community needs. Social Services and disability service systems have experienced funding cuts and loss of community services which creates challenges for those we serve. HHA staff has coordinated statewide and local training sessions promoting effective Integrated Pest Management strategies to address Bed Bug and other pest prevention and treatment strategies in affordable housing.

Goal 2 Progress: Redevelop, Renew, and Replace Obsolete Properties Where Appropriate with Mixed-Income Housing Opportunities for the Community

HHA is exploring all redevelopment options to rehabilitate and/or replace its aged public housing stock. HHA will develop and implement a public housing repositioning strategy utilizing RAD, Voluntary Conversion, and/or Demo Dispo options in order to preserve and rehabilitate HHA's existing 366 units of public housing. Replacement of units will be pursued when necessary and cost effective. HHA will continue to perform modernization and rehabilitation to ensure quality housing. HHA's rehabilitation and preservation and/or replacement efforts will focus on improving physical accessibility, health and safety, energy and resource efficiency, and long-term operational efficiency and sustainability, while protecting the rights of residents. Resources are quite limited that are needed to address HHA's redevelopment needs and HHA is working with local and state efforts to increase possible resources. HHA Board has been increasing its knowledge of public housing repositioning options including meeting with the Denver Regional Public Housing Repositioning TA panel and attending national conferences focusing on repositioning. HHA Board of Commissioners has directed the executive director to identify a plan for the development and implementation of a HHA public housing repositioning strategy including redevelopment activities. HHA has focused its Capital Fund resources on essential needs such as replacement roofing, and 504 concrete work to preserve and protect existing properties. HHA HUD REAC PASS recent scores have improved due to this investment.

Goal 3 Progress: Utilize Housing Authority Resources in an Efficient, Responsible, Ethical, Coordinated, and Results Oriented Manner

HHA continues efforts to manage operations in an efficient, responsible, ethical, coordinated, and results oriented fashion. HHA had a FY 2019 PHAS PHA High performer score of 92/100, but experienced a lower SEMAP score due to challenges leasing up HCV vouchers. HHA has continued to achieve strong financial performance using less operating funds and directing more resources at its capital, maintenance, system upgrades, and other organizational needs. HHA developed in-house expertise in addressing needs such as meth remediation and bed bug management with better results and significantly lower costs. HHA continues its commitment to its Energy performance Contract that saves both resources and financial resources. HHA is participating in Better Building Challenge to reduce resource utilization by 20%. HHA is including energy and resource efficiency and long term sustainability goals in its redevelopment plans going forward. HHA implemented major upgrades in its YARDI primary data system, and a Rent Reasonable program to provide more effective, accurate, and easier to access organizational data for staff in understanding and improving our operations. HHA is looking at other IT solutions to increase productivity and resident and landlord access.

Goal 4 Progress: Improve the Housing Authority's Fiscal Position

HHA continues to have a strong financial performance managing our operations within our limited resources. HHA has achieved clean audits with no audit findings. We continue to manage HHA's finances carefully to balance financial resources with operational needs and HHA mission related goals. HHA's financial practices remain conservative to maintain strong financial ratios and PHA FASS scores, prepare for financial uncertainties, and fully utilize its funding resources in support of its mission to the Helena community. HHA has been able to keep more of its Capital Funds directed at Capital needs declining to use Capital Funds operations subsidy to address pressing essential capital improvement needs. HHA looks to meet its organizational needs in cooperation with community efforts so as to lessen the financial burden on HHA acting alone. HHA continues to advocate for additional affordable housing funding resources on the local, state, and federal level including philanthropic support particularly to address resident and program participant needs and our housing renovation and redevelopment needs.

Goal 5 Progress: Promote and Secure Services for Housing Authority Residents, Participants, and Applicants

HHA continues to promote and secure services for HHA residents, participants, and applicants. HHA is working to link to services related to basic needs, childhood development, education and career training, and health care and disability services resources. HHA's Family Investment Center partnership with the Career Training Institute connects our residents and participants to high quality career training opportunities. HHA partners with child and family development programs to make Head Start, and Childcare available on-site. HHA Staff work to foster collaboration between housing staff and local community agencies in support of the support service needs of those we serve. HHA has worked the leadership of the MT

	<p>Department of Public Health and Human Services, and local area agencies to identify issues of common concern which will improve outcomes for the very low families and persons which HHA and MT DPHHS programs both serve. HHA is leading a "Housing is Healthcare" FUSE project supporting cross systems housing and health care data sharing allowing our community to better understand the needs of the homeless and unstably housed in our community. Phase II of this project in 2020 and 2021 will develop an implementation plan for permanent supportive housing solutions in our community including the possible development of on-site services at HHA housing locations.</p>
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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.

The Helena Housing Authority (HHA) has adopted a policy (the "HHA VAWA Policy") to implement applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA). HHA's goals, objectives and policies to enable HHA to serve the needs of child and adult victims of domestic violence, dating violence and stalking, as defined in VAWA. The purpose of this policy (herein called "Policy") is to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) and more generally to set forth HHA's policies and procedures regarding domestic violence, dating violence, sexual assault, and stalking, as hereinafter defined. This Policy shall be applicable to the administration by HHA of all federally subsidized public housing and Section 8 rental assistance under the United States Housing Act of 1937 (42 U.S.C. §1437 et seq.). Notwithstanding its title, this Policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, sexual assault, or stalking as well as female victims of such violence. A complete copy of this HHA VAWA policy is available upon request. VAWA policy has been incorporated into the HHA's Admissions and Continued Occupancy Policy (ACOP), and the Housing Choice Voucher (HCV) Admin Plan.

A. The following activities, services, or programs are provided by HHA, directly or in partnership with other service providers, to child and adult victims of domestic violence, dating violence, sexual assault or stalking.

Admissions Preference The HHA has a preference for victims of domestic violence, dating violence, sexual assault or stalking in admission to its public housing and Housing Choice Voucher programs. Applicants for housing assistance from HHA will receive a preference in admissions by virtue of their status as victims of domestic violence, dating violence, sexual assault, and stalking. This preference is particularly described as follows:

This preference is for applicants where actual or threatened physical violence is directed against the applicant or other members of the applicant's household within the past six months. HUD defines this as "actual or threatened physical violence directed against one of more members of the applicant's family by a spouse or other members of the applicant's household."

Non-Denial of Assistance. HHA will not deny admission to public housing or to the Housing Choice Voucher (Section 8) rental assistance program to any person because that person is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, provided that such person is otherwise qualified for such admission. Admissions Preference. Applicants for housing assistance from HHA will receive an admissions preference by virtue of their status as victims of domestic violence, dating violence, sexual assault, and stalking. This preference is particularly described as follows: This preference is for applicants where actual or threatened physical violence is directed against the applicant or other members of the applicant's household within the past six months. HUD defines this as "actual or threatened physical violence directed against one of more members of the applicant's family by a spouse or other members of the applicant's household."

Termination of Tenancy or Assistance

VAWA Protections. Under VAWA, public housing residents and persons assisted under the Housing Choice Voucher (Section 8) rental assistance program have the following specific protections, which will be observed by HHA:

1. An incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking will not be considered to be a "serious or repeated" violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.

2. In addition to the foregoing, tenancy or assistance will not be terminated by HHA as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence, sexual assault, or stalking engaged in by a member of the assisted household, a guest or another person under the resident's control, and the resident or an immediate family member is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:

(a) Nothing contained in this paragraph shall limit any otherwise available authority of HHA or a Section 8 owner or manager to terminate assistance or evict due to any lease violation not premised on the act of violence in question against the tenant or member of the tenant's household, provided that the owner or manager does not subject an individual who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking to a more demanding standard than other tenants in determining whether to evict or terminate assistance.

(b) Nothing contained in this paragraph shall be construed to limit the authority of HHA or a HCV (Section 8) owner or manager to terminate the assistance of, or evict, any occupant who can be demonstrated to pose an actual or imminent threat to other tenants or the property's employees.

(c) Nothing contained in this paragraph shall be construed to limit HHA or a Section 8 owner or manager from honoring various court orders issued to either protect the victim or address the distribution of property in case a family breaks up.

(d) Nothing contained in this paragraph shall be construed to supersede any provisions of federal, state, or local laws that provide greater protection for victims of abuse.

Removal of Perpetrator. Further, notwithstanding anything in Termination Tenancy Paragraph 2 (a) (b) (c) , or Federal, State or local law to the contrary, HHA or a HCV (Section 8) owner or manager, as the case may be, may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a resident or lawful occupant and who engages in acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant and such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by federal, state, and local law for the termination of leases or assistance.

Leases used for all public housing operated by HHA and, at the option of Section 8 owners or managers, leases for dwelling units occupied by families assisted with Section 8 rental assistance administered by HHA, shall contain provisions setting forth the substance of this paragraph.

B. The following activities, services, or programs are provided by HHA to help child and adult victims of domestic violence, dating violence, sexual assault, or stalking maintain housing.

It is the policy of HHA to cooperate with organizations and entities, both private and governmental that provides shelter and/or services to victims of domestic violence. If HHA staff becomes aware that an individual assisted by HHA is a victim of domestic violence, dating violence, sexual assault, or stalking, HHA will refer the victim to such providers of shelter or services as appropriate.

The HHA has a partnership with the Friendship Center, which is a shelter for women and children who have suffered domestic violence and sexual abuse. The HHA has a co-operative agreement with the Friendship Center to assist with housing for victims. HHA offers an admissions preference

HHA working with the Friendship Center, Helena Police Department, and Lewis and Clark County Sherriff Office provides a Helena Housing Authority pamphlet entitled “Know Your Rights: Domestic Violence and Assisted Housing” to victims of domestic violence in contact with law enforcement and victim advocates along with other community support services informational materials.

Transfer to New Residence

A. Application for transfer. In situations that involve significant risk of violent harm to an individual as a result of previous incidents or threats of domestic violence, dating violence, sexual assault, or stalking, HHA will, if an approved unit size is available at a location that may reduce the risk of harm, approve transfer by a public housing or HCV (Section 8) resident to a different unit in order to reduce the level of risk to the individual. A resident who requests transfer must attest in such application that the requested transfer is necessary to protect the health or safety of the resident or another member of the household who is or was the victim of domestic violence, dating violence, sexual assault, or stalking and who reasonably believes that the resident or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.

B. No right to transfer. HHA will make every effort to accommodate requests for transfer when suitable alternative vacant units are available and the circumstances warrant such action. However, except with respect to portability of HCV (Section 8) assistance as provided in paragraph IX. E. below the decision to grant or refuse to grant a transfer shall lie within the sole discretion of HHA, and this policy does not create any right on the part of any applicant to be granted a transfer.

C. Portability. Notwithstanding the foregoing, a HCV (Section 8) assisted resident will not be denied portability to a unit located in another jurisdiction (notwithstanding the term of the resident’s existing lease has not expired, or the family has not occupied the unit for 12 months) so long as the resident has complied with all other requirements of the HCV (Section 8) program and has moved from the unit in order to protect a health or safety of an individual member of the household who is or has been the victim of domestic violence dating violence, sexual assault or stalking and who reasonably believes that the resident or other household member will be imminently threatened by harm from further violence if the individual remains in the present dwelling unit.

C. The following activities, services, or programs are provided by HHA to prevent domestic violence, dating violence, sexual assault and stalking, or to enhance victim safety in assisted families.

The HHA routinely advertises local community services and programs available to the community regarding education on and prevention of domestic violence, sexual assault and stalking, and sexual harassment. We also post information related to sexual harassment and Fair Housing.

B.5

Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

- Changes to tenant rent or admissions policies;
- Changes to the Housing Choice Voucher and Public Housing termination policy;
- Changes to the organization of the waiting list(s);
- Changes to tenant screening policy;
- Additions of non-emergency work items (items not included in the current CFP Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund;
- Any action with regard to Public Housing Repositioning: RAD, demolition or disposition designation or conversion activities, or homeownership programs.

B.6	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) provide comments to the 5-Year PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (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.
B.7	Certification by State or Local Officials. 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.

Instructions for Preparation of Form HUD-50075-5Y 5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full PHA Name, PHA Code, , PHA Fiscal Year Beginning (MM/YYYY), 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. 5-Year Plan.

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\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

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\(a\)\(3\)](#))

B.5 **Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide 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\(a\)](#), [24 CFR §903.19](#))

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 .76 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.
