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: <u>LittletonHousing Authority</u>				CO036	
		Performing	☐ Standard	☐ HCV (Section 8)		
	PHA Fiscal Year Beginning: (MM/YYYY):	_10/2011				
2.0	Inventory (based on ACC units at time of F	V hasinning i	in 1.0 above)			
2.0	Number of PH units: 143	i beginning i		umber of HCV units:288_		
	Number of FIT units.		140	milet of the values. <u>200</u>		
3.0	Submission Type					
	5-Year and Annual Plan	Annual I	Plan Only	5-Year Plan Only		
4.0						
4.0	PHA Consortia: (Check box if submitting a joint Plan and complete table below.)					
					No. of Units in Each	
	Participating PHAs	PHA	Program(s) Included in the	Programs Not in the	Program	
		Code	Consortia	Consortia	PH	HCV
	PHA 1:					
	PHA 2:					
	PHA 3:					
5.0	5-Year Plan. Complete items 5.1 and 5.2 on	ly at 5-Year l	Plan update.			
<i>-</i> 1	Mining Canada al Dita: No		£1 ! 1 . !		atition to at 187	T A ? _
5.1	Mission. State the PHA's Mission for servir jurisdiction for the next five years:	ig the needs o	of low-income, very low-income,	and extremely low income far	nilies in the Pi	HA'S
	Littleton Housing Authority seeks to strengtl	nen our comn	unity by creating opportunities	for diverse housing alternative	2	
	Extretion froughing radiionty seeks to stronger	icii oui coiiii	runity by creating opportunities	for diverse nousing alternatives		
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very					
	low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals					
	and objectives described in the previous 5-Y	ear Plan.				
	The Board of Commissioners developed a five-year strategic plan in 2012. The following five-year goals and objectives were					
	approved on may 3, 2012.					
	1. Strengthening Leadership in the Community.					
	a. Establish/strengthen Housing and Administrative Partnerships					
	b. Promote Agency Programs and Projects					
	c. Establish and Develop New Programs and Projects					
	2. Anticipating and Meeting the					
	a. Plan and Implement Nev					
	b. Assess Existing Housing Programs (numbers of units needed)					
	c. Assess and Improve Existing Projects/Programs					
	3. Increase Sustainability to Maintain and Enhance the Quality of Life in the Community					
	a. Develop Sustainability N	Aaster Plan	•	•		
	b. Implement Sustainability	Master Pla	n			
	 c. Review and Update Sust 					
	d. Implement Updated Cha	nges to Mas	ter Plan			
	4. Enhance the Image of LHA					
	 Develop Image Strategy 					
	b. Publicize Agency Progra		olishments			
	c. Encourage Volunteerism					
	Increase Operational Efficient					
	a. Identify Alternative Sou		ding			
	b. Seek out Funding Partne					
	c. Build Teamwork and Morale					
	d. Build and Assess Staff Knowledge and Expertisee. Improve Organizational Processes, Technology and Infrastructure					
	e. Improve Organizational	Processes, T	echnology and Infrastructure	e		

	PHA Plan Update				
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	(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:				
	The Littleton Housing Authority has updated its housing program and operations and management policies to be in compliance with all regulations and requirements.				
6.0	(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.				
	The Annual and Five-year plans are available for review at the Littleton Housing Authority's administrative offices at 5745 South Bannock Street, Littleton, Colorado 80120.				
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.				
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as 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.				
	These statements are included in the Annual/Five-year plan book for public review, and will be included with this submission as an attachment (see Attachment #1).				
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.				
	The five-year action plan is included with this submission as an attachment (see Attachment #2.				
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.				

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.

In an effort to identify the housing needs of the Littleton Housing Authority clientele, the Arapahoe County Consolidated Plan for 2009-2013 was consulted, and the following observations were made:

- In terms of **affordability**, there is a shortage of 12,500 affordable rental units for renters earning less than \$20,000 per year (extremely low income) in Arapahoe County. In addition, approximately 12,500 renters who earn less than \$20,000 pay so much for their rental housing that they have difficulty affording other necessary household costs—such as transportation, childcare and health care. According to the Metro Denver Vacancy and Rent Survey, the median rent for Littleton in 2007 was \$806 per month.
- With regard to the **elderly** population, both with and without disabilities, rental needs are close to being met, as evidenced by an analysis of housing authority waiting lists. There is a greater need at this time for **families with children and families with disabilities**. However, more baby boomers will be classified as elderly in the coming years and the need for housing the elderly population is likely to increase as this population ages.
- The largest **racial** group to occupy rental units in the jurisdiction is Caucasian/white (72%). African Americans account for 16% of renter households, and household characterizing themselves as "some other race" account for 5% of renter households.
- In terms of **supply** of housing, the Littleton Housing Authority has a total of 1,077 subsidized rental housing units. At the time of the County's housing needs assessment, the Littleton Housing Authority had 993 household for Section 8 voucher and public housing programs on their combined wait lists, indicating that there are almost as many households on the combined wait list as there are households being served.
- In a survey conducted by Arapahoe County of public housing waitlist families, respondents indicated that they did not have difficulty finding **accessible** units in the jurisdiction.
- In terms of size, rental units in Arapahoe County are most likely to be one-bedroom (35%) and two-bedroom (39%) units.
- While there is little data regarding the condition of the interior features of housing stock in the jurisdiction, the median year of housing structures built in the City of Littleton is 1979. The plan observed that as housing stock ages, the number and cost of required repairs will increase, and if repairs are not made, the **quality** of the area's housing will decline. The Littleton Housing Authority's housing stock is in relatively good condition.
- With regard to **location**, rental units in the jurisdiction are close to major transportation arterials and more dense and urban areas, including the City of Littleton.

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.

The Littleton Housing Authority has developed the following strategies for addressing housing needs in the City of Littleton.

- Continue to provide subsidized rental assistance through our Section 8 and Public Housing programs. At this time, waiting lists for both programs are open and applications are being taken on a daily basis.
- The Littleton Housing Authority purchased 69 units of market rental housing in three buildings in 2008 and is seeking to rehabilitate the buildings during the next year. The housing authority will explore the feasibility of purchasing additional multi-family buildings in an effort to continue to provide affordable market rental housing in the community.
- Proposed redevelopment of Powers Avenue site as an in-fill, multi-family rental development in the northeast neighborhood. The project is expected to increase density on the site from eight units to approximately 50 units of affordable housing, including workforce housing. Eight units in the new project are expected to be project-based Section 8.
- The Littleton Housing Authority receives over \$200,000 per year from HUD for capital improvements to its public housing stock. Modernization efforts will continue on Bradley House and family public housing units in accordance with the five-year action plan.

The Littleton Housing Authority is committed to providing affordable housing choices to all persons regardless of race, color, religion, sex, marital status, familial status, national origin, age, or handicap of the applicant. The Littleton Housing Authority will abide by all federal, state and local requirements and laws in this regard and will take the following steps to affirmatively market its housing programs:

- All brochures and public information relating to housing programs will display the "equal housing opportunity" slogan and logo.
- All applicants will be provided with a copy of the HUD brochure "Fair Housing, It's Your Right."
- The Littleton Housing Authority will inform the general public of its affordable housing opportunities via the housing authority website and various local and regional publications as needed.

9.0

9.1

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.

Although the Littleton Housing Authority's Board of Commissioners established new goals and objectives for the agency in early 2012, progress made in meeting the mission and goals has been detailed in an annual report provided to the agency's Board of Commissioners at their annual meeting on May 3, 2012. The report is too lengthy to summarize in this section and is included in this five-year plan as an attachment (see Attachment #3).

10.0

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

The Littleton Housing Authority's definition of "significant amendment" and "substantial deviation modification" are as follows:

Substantial deviation from the five-year plan include:

- Changes to rent or admissions policies or organization of the waiting lists
- · Additions of non-emergency work items (items not included in the current annual statement or five-year action plan)
- Change of replacement reserve funds under the Capital Fund
- Any change with regard to demolition or disposition
- Any change with regard to designation
- · Any change with regard to homeownership programs funded with Section 8 or Public Housing funds
- Any change with regard to conversion activities

Significant Amendment or Modification to the Annual Plan: When the activity itemized as substantial deviation will take place in a particular year or years, that activity will be detailed and submitted for approval in that year's Annual Plan.

In the previous agency plan, details were included for a Redevelopment Project that included demolition/disposition of 26 public housing family units. In the past 12 months, the Littleton Housing Authority has determined that the proposed redevelopment project that earmarked these units for demolition/disposition is not financially or politically feasible. Therefore the project has been discontinued indefinitely.

- 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)
 - (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. 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.
 - (g) Challenged Elements
 - (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only)
 - (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only)

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 housing.
- 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.
- 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.
- 7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers
 - (a) 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.cfm

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

(c) 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.
 - 8.1 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
 - (c) 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:
- $\underline{http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm}$
- 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.