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-HCV is to be completed annually by HCV-Only PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

(1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.

(2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.

(3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.

(4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.

(5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

### A. PHA Information.

#### A.1

- **PHA Name**: Housing Authority of the County of Riverside
- **PHA Code**: CA027
- **PHA Plan for Fiscal Year Beginning**: (MM/YYYY): 07/01/2019
- **PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
- **Number of Housing Choice Vouchers (HCVs)**: 9821
- **PHA Plan Submission Type**: [ ] Annual Submission [ ] Revised Annual Submission

**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 of 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 the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.

#### PHA Consortia: (Check box if submitting a joint Plan and complete table below)

**Participating PHAs** | **PHA Code** | **Program(s) in the Consortia** | **Program(s) not in the Consortia** | **No. of Units in Each Program**
--- | --- | --- | --- | ---
Lead HA: 


## B. Annual Plan

### B.1 Revision of PHA Plan Elements

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

<table>
<thead>
<tr>
<th>Element</th>
<th>Y</th>
<th>N</th>
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<tbody>
<tr>
<td>Housing Needs and Strategy for Addressing Housing Needs</td>
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<tr>
<td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions</td>
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<td>Financial Resources</td>
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<td>Rent Determination</td>
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<td>Informal Review and Hearing Procedures</td>
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<td>Homeownership Programs</td>
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<td>Substantial Deviation</td>
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<tr>
<td>Significant Amendment/Modification</td>
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</table>

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

Amended the existing 2018/2019 Annual Plan to provide additional alternatives on how it awards project-based vouchers for certain properties where the Housing Authority has an ownership interest or control of the properties as allowed under 24 CFR 983.51 (Owner proposal selection procedures). Specifically, the Housing Authority is proposing to award 79 Project Based Vouchers to the Perris Park Apartments, which is located in the City of Perris, CA. The Housing Authority’s affiliated non-profit Riverside Community Housing Corporation (RCHC) is currently in the process of acquiring the Perris Park Apartments and plans on rehabilitating the property to meet Housing Quality Standards. Additionally, the Housing Authority is proposing to award 11 Project Based Vouchers to the Desert Rose Apartments, located in the unincorporated County of Riverside community of Ripley. The vouchers will provide additional resources to the development and not only provide financial stability but continue to offer affordable housing opportunity to the residents of Ripley. The Housing Authority is also exploring bringing additional service providers to the property that can offer after school programs for the children and work development programs for its residents. Furthermore, the amendment is proposing to revise the Housing Authority’s Prohibited Criminal Activity policy to facilitate the housing of chronic homeless and special needs populations referred by the County Department of Behavioral Health.

### B.2 New Activities

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

<table>
<thead>
<tr>
<th>Activity</th>
<th>Y</th>
<th>N</th>
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<tbody>
<tr>
<td>Project Based Vouchers</td>
<td></td>
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</table>

(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

**Project-based Vouchers**

The Agency currently has 622 project-based vouchers at twenty-four developments: 10 units in Blythe, 52 units in Cathedral City, 67 units in Riverside, 50 units in Jurupa Valley, 65 units in Moreno Valley, 75 units on March Air Base, 38 units in Perris, 44 units in Lake Elsinore, 14 units in San Jacinto, 14 units in Banning, 33 units in Beaumont, 39 units in Mecca, 53 units in Thermal, 41 units in Desert Hot Springs, 20 units in Indio and 7 units in Temecula. The agency proposes to expand the use of project based vouchers for FY 2019-20 to further facilitate the development of affordable housing within Riverside County by developing Housing Authority or Successor Agency (HASA) owned properties, those that exclusively assist veterans or farmworker families or development projects to support applications for state and federal funding opportunities. To support this expansion, the maximum allotment allowed under regulations (20% of total allocation) will be reserved.

### B.3 Most Recent Fiscal Year Audit

(a) Were there any findings in the most recent FY Audit?

<table>
<thead>
<tr>
<th>Finding</th>
<th>Y</th>
<th>N</th>
<th>N/A</th>
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(b) If yes, please describe:
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<th>B.4</th>
<th>Civil Rights Certification</th>
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<tr>
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<th>B.5</th>
<th>Certification by State or Local Officials.</th>
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</tr>
</tbody>
</table>
B.6 Progress Report.

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

PHA Goal: Expand the supply of assisted housing.
Objective: Increase housing choices for families and individuals.
- Apply for additional vouchers
  - The Agency applied for and received 18 additional project-based VASH vouchers in FY 16-17 at Community of Friends in Riverside
  - The Agency applied for and received 59 additional project-based VASH vouchers in FY 16-17 at Veterans Village of Cathedral City
  - The Agency applied for and received 79 additional Mainstream vouchers in FY 18/19 to assist non-elderly persons with disabilities who are transitioning out of institutional housing or who may be at risk of institutionalization, experiencing homelessness or at risk of becoming homeless.
  - The Agency applied for and received 68 additional tenant-based VASH vouchers in FY 18/19.
- Leverage private or other public funds
  - The Agency leveraged HOME, HASA and NSP funding to expand affordable housing opportunities via project-based vouchers at 9 new developments throughout Riverside County. Multi-family properties are in varying stages of development at the following locations:
    - Cedar Glen II Apartments in Riverside (49 PBV at a 50 unit development)
    - Mission Heritage Plaza in Riverside (19 PBV at a 72 unit development)
    - Mission Village II in Temecula (8 PBV at a 76 unit development)
    - Arc Village in Palm Desert (6 PBV at a 36 unit development)
    - Cedar Glenn Phase 2 in Riverside (24 PBV at a 50 unit development)
    - St. Michaels in Riverside (24 PBV at a 50 unit development)
    - Oasis Senior Villas in Riverside (46 PBV at a 95 unit development)
    - Mission Gateway Villas in Jurupa Valley (20 PBV at a 68 unit development)
    - Cathedral Palms Apts. in Cathedral City (36 PBV at a 224 unit development)
  - Acquire, construct, or rehabilitate housing units and developments to expand affordable housing opportunities and promote homeownership for low-income households

PHA Goal: Improve the quality of assisted housing.
Objective: Maintain safe, decent, sanitary units and improve quality of life for residents living in assisted housing.
- Obtain and maintain High Performer status for HCV voucher management (SEMAP Score)
  - The Agency successfully met this goal in FY 17-18 for the 16th consecutive year
- Obtain and maintain High Performer status for Public Housing management (PHAS Score)
  - On October 1, 2016, the former public housing units were fully converted over to Project Based Voucher (PBV) units and as such the agency is no longer rated under the Public Housing management assessment (PHAS) system.
- Provide excellent customer service
  - The Agency received a 99.7% favorable customer service rating via completed customer service surveys
- Renovate or modernize public housing units
  - As of October 1, 2016, the agency no longer owns or manages public housing units.
- Annually inspect units to meet Housing Quality Standards with the option to bi-annually inspect units that regularly pass inspection.
  - The Agency annually inspects units to ensure they meet Housing Quality Standards. The option to conduct bi-annual inspections remains in place but has not been utilized.
- Allocate project-based vouchers for qualified housing projects
  - See the above PHA Goal to Expand the Supply of Existing Housing.

PHA Goal: Increase assisted housing choices.
Objective: Encourage resident choice in rental selection
- Conduct outreach efforts to potential landlords
  - Quarterly landlord workshops are conducted and advertised on the agency’s official website.
  - Rental units are listed using GoSection8.com and both landlords and tenants utilize this complementary resource
- Provide replacement vouchers
  - The Agency actively selects families from the HCV waiting list to fill all funded turnover vouchers. In CY 2018, the agency selected 2440 new families from the waiting list in order to fill turnover vouchers.
  - The HCV waiting list is open for new registrations.
- Expand self-sufficiency programs for participant households
  - The FSS program was selected for a National Family Self Sufficiency Evaluation and was unable to accept new enrollments for CY 2015. Starting January 1, 2016, the agency started to enroll new families into the FSS program and has continued to do so until further notice.
B.6 Progress Report Continued

- The agency was recently notified that pending funding allocation from HUD, the company hired to conduct HUD’s National Family Self Sufficiency Evaluation, plans to continue follow up activities on the FSS Participants selected for FSS participation during the National Family Self Sufficiency Evaluation.
- Allocate project-based voucher for qualified housing projects
- See the above PHA Goal to expand the supply of existing housing
- Partner with local workforce development centers to positively further self-sufficiency within assisted housing households.
- For the items listed under this goal, the agency does the following:
  - Connects interested families to employment opportunities via the local Workforce Development Centers throughout Riverside County.
  - Utilizes 7 full time FSS coordinators to work with interested participants to achieve their self-sufficiency goals.
  - Displays work opportunities and other self-sufficiency opportunities in its Riverside and Indio offices.
  - Continues to have a local waiting list preference for working families (and disabled and elderly families).

PHA Goal: Promote self-sufficiency within assisted housing programs
Objective: Promote economic independence for families and individuals.
- Connect working able and work-ready households to employment opportunities
- Provide or attract supportive services to improve assisted members’ employability
- Expand self-sufficiency programs for residents in the assisted housing programs

PHA Goal: Ensure equal opportunity and affirmatively further fair housing.
Objective: Promote equal housing opportunities.
- Facilitate affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability
- Carry out affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability
- Promote equal housing opportunities
- For the items listed under this PHA goal, the agency strives to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including the following:

1. Marketing HACR programs to all eligible persons, including persons with disabilities and persons with limited English proficiency.

All Agency programs will be marketed to all eligible persons, including persons with disabilities and persons with limited English proficiency. This marketing and outreach will include newspaper notices including publications in minority newspapers, outreach to community groups that serve persons with disabilities and persons with limited English proficiency, postings on the Agency website (www.harivco.org), and lobby signs posted in our office locations. Persons with disabilities will be assisted if the application process if requested as a reasonable accommodation. Translation services are available to persons with limited English proficiency at no cost to the participant. The Agency also employs several bilingual staff members who regularly provide assistance to Spanish speaking applicants/participants.

2. Utilizing buildings and communications that facilitate service delivery to persons with disabilities.

Application intake, office appointments, voucher/contract issuance, and informal hearings are all conducted in accessible office spaces. The Agency also provides home visits for appointments upon request as a reasonable accommodation. Sign language and Braille services are also available if necessary to service hearing and visually impaired persons.

3. Supporting and expanding housing choice through landlord outreach, participant education, and security deposit assistance.

The Agency conducts workshops for prospective and exiting landlords to educate them on the Housing Choice Voucher Program and HUD guidelines. Participants receive information on housing choice and housing opportunities at all briefing sessions. Additionally, the Agency administers a security deposit assistance program for new participants to support housing choice efforts.

4. Referrals to fair housing agencies

Referrals to fair housing agencies are available upon request. Additionally, staff will advise participants to seek fair housing services if a situation arises that warrants such referral (i.e. landlord/tenant issue, questions regarding tenant rights, renters rights in foreclosure).

5. Informing participants on how to file a fair housing complaint.

The HUD fair housing form is provided to applicants/participants in the applicant briefing packet and upon request. Fair housing notices are posted in all office locations. Applicants/participants are provided assistance in filling out the form and are referred to HUD for additional information and assistance. The toll-free number for the Housing Discrimination Hotline is posted in office lobbies and also provided in briefing packet materials.

6. Staff training

All Agency staff members are informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all participants, including providing reasonable accommodations to persons with disabilities, as part of the Agency’s overall commitment to quality customer service. Staff is regularly trained on local, state, and federal fair housing laws and issues.
B.6 Progress Report Continued

7. The Family Self Sufficiency (FSS) program is an important program for promoting housing opportunities, housing choice, and housing mobility through self-sufficiency. As such, the Agency will take additional steps to ensure that this program is administered in a manner that affirmatively furthers fair housing. This includes:

Whenever a FSS coordinator position is available and advertised, the Agency will advertise throughout the community allowing all interested parties an opportunity to apply. Notices are published in the local newspapers, posted on the County of Riverside website, and distributed among Agency employees. Consideration will be given to qualified applicants who have experience in fair housing issues, housing counseling, and/or are bi-lingual.

The FSS program will be marketed to all eligible persons, including persons with disabilities and persons with limited English proficiency. The Agency markets the FSS program through periodic mailings to all Housing Choice Voucher (HCV) participants; announcements and program descriptions provided in briefing sessions and annual recertification packets; and lobby signs posted in our office locations. Translation services are available to persons with limited English proficiency at no cost to the participant. In addition, the Agency employs several bi-lingual staff members who regularly provide assistance to Spanish speaking participants.

Promoting fair housing in homeownership. FSS participants enrolled in the homeownership program receive information on fair lending practices and laws.

8. Record Keeping

The Agency will maintain a record of the following information for all participants: the race, ethnicity, familial status, and disability status of program participants; any reasonable accommodation requests and the disposition of each; and the employment status of all participants. Program information will be reviewed on an ongoing basis for program reporting and planning.

Other PHA Goal and Objective: Implement the requirements of the Violence Against Women Act (VAWA)

- Protect certain victims of criminal domestic violence, dating violence, sexual assault, or stalking (as well as members of the victims’ immediate families) from losing their HUD assisted housing as a consequence of abuse of which they were the victim
- Undertake affirmative measures to make tenants participating in the HCV and Public Housing programs aware of VAWA requirements.
- Undertake affirmative measure to make Owners participating in the HCV program aware of VAWA requirements.

In order to meet this goal, the denial of assistance to an applicant or termination of assistance of a participant for criminal activity are subject to the provisions of the Violence Against Women Act of 2005 and reviewed by a committee on a case by case basis, with supporting documentation (including form HUD 50066).

B.7 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y ☒ N ☐

(a) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
Instructions for Preparation of Form HUD-50075-HCV
Annual PHA Plan for HCV Only PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.23(4)(c))

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

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

B. Annual Plan. All PHAs must complete this section. (24 CFR §903.11(c)(3))

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

☐ Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income families who reside in the PHA’s jurisdiction and other families who are on the Section 8 tenant-based waiting list. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1) and 24 CFR §903.7(a)(2)(i)). 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. (24 CFR §903.7(a)(2)(ii))

☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (24 CFR §903.7(b))

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

☐ Rent Determination. A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

☐ Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)(3)(4)).

☐ Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

☐ Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8 of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA’s partnerships with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA’s partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. Include the program’s size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(iii))

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

☐ Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; or b) any change with regard to homeownership programs. See guidance on HUD’s website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii))

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

B.2 New Activity. If the PHA intends to undertake new activity using Housing Choice Vouchers (HCVs) for new Project-Based Vouchers (PBVs) in the current Fiscal Year, mark “yes” for this element, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake this activity, mark “no.” (24 CFR §983.57(b)(1) and 24 CFR §811(c)(3) of the United States Housing Act of 1937)

☐ Project-Based Vouchers (PBV). Describe any plans to use HCVs for new project-based vouchers. If using PBVs, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.
B.3 **Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.11(c)(3), 24 CFR §903.7(p)])

B.4 **Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation,* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the 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. ([24 CFR §903.7(o)]

B.5 **Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,* including the manner in which the applicable plan contents are consistent with the Consolidated Plans, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15)]

B.6 **Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.11(c)(3), 24 CFR §903.7(o)(1)]

B.7 **Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.15(c), 24 CFR §903.19)]

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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 Annual PHA Plan. The Annual PHA Plan provides 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 for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 4.5 hour 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.