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

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 **PHA Name** Hawaii Public Housing Authority **PHA Code** HI001

PHA Plan for Fiscal Year Beginning (MM/YYYY) 07/2017
PHA Plan Submission Type: ☐ 5-Year Plan Submission ☒ Revised 5-Year Plan 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 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.

The PHA Plan and all supporting documents are available on the internet:
http://www.hpha.hawaii.gov/housingplans/index.htm

Hard copies of the plan are available at the following locations:

Hawaii Public Housing Authority
1002 North School Street, Bldg. E
Honolulu, Hawaii 96817

Lanakila Homes
600 Wailoa Street
Hilo, Hawaii 96720

Ka Hale Kahaluu
78-6725 Makolea Street
Kailua-Kona, Hawaii 96740

Kapaa
4726 Malu Road
Kapaa, Hawaii 96746

Kahekili Terrace
2015 Holowai Place
Wailuku, Hawaii 96793

☐ PHA Consortia (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	**5-Year Plan.** Required for all PHAs completing this form.
B.1	**Mission.** The Hawaii Public Housing Authority (HPHA) is committed to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
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. **A. Need: There is a shortage of affordable rental housing for all eligible populations.** **Goal 1: Maximize the HPHA's current resources for housing programs** Objective 1a: Maintain occupancy at no less than 98% (adjusted for units in modernization) each fiscal year Objective 1b: Increase voucher utilization to no less than 60% of available section 8 housing choice vouchers, subject to the availability of funds Objective 1c: Annually assess the HPHA's policies regarding continued occupancy in public housing **Goal 2: Increase the number of affordable housing units** Objective 2a: Apply for additional State and Federal rental subsidies for tenant based rental assistance programs, subject to availability of funds, including without limitation seeking additional Veterans Affairs Supportive Housing (VASH) vouchers, Rental Assistance Demonstration (RAD) conversions, and the Choice Neighborhood Initiative (CNI) Objective 2b: Leverage affordable housing resources in the community through public private partnerships and the creation of mixed use, mixed finance housing with a goal of 3,000 additional units by FY2022 Objective 2c: Assess the HPHA's inventory to identify potential for mixed finance redevelopment and pursue mixed finance redevelopment where feasible. Objective 2d: Continue to pursue mixed finance redevelopment and demolition/disposition of targeted properties, including without limitation, Mayor Wright Homes, Kuhio Park Terrace, Puuwai Momi, AMP 37, AMP 38, AMP 39. **B. Need: There is a high demand for housing for families at or below 30% of median income.** **Goal 3: Provide targeted assistance to families at or below 30% of median income** Objective 3a: Exceed federal targeting requirements for families at or below 30% of AMI in public housing Objective 3b: Exceed federal targeting requirements for families at or below 30% of AMI receiving section 8 tenant-based rental assistance Objective 3c: Examine the potential to increase state resources for rent supplement program(s) Objective 3d: Provide preference for homeless families, involuntarily displaced, and victims of domestic abuse

C. Need: The HPHA must meet HUD standards for program performance under the Federal Low Income Housing Program

Goal 4: Improve the HPHA's Public Housing Assessment System Score to achieve a high performer score of no less than 90 points

Objective 4a: Increase the HPHA's Score to no less than 22 points under the Management Assessment Subsystem of the PHAS

Objective 4b: Increase the HPHA's Score to no less than 35 points under the Physical Assessment Subsystem of the PHAS

Objective 4c: Maintain the HPHA's score of 25 points for the Financial Assessment Subsystem of the PHAS

Objective 4d: Maintain the HPHA's score of 10 points under the Capital Fund Subsystems of the PHAS

Goal 5: Improve the HPHA's Section Eight Management Assessment Program (SEMAP) score to maintain a high performer rating with no less than 97 points

Objective 5a: Maintain documentation that the HPHA's quality control samples of applicants reaching the top of the waiting list and of admissions show that at least 99% of the families in the samples were selected from the waiting list for admission in accordance with the HPHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection

Objective 5b: Maintain documentation which shows that the HPHA's quality control sample of tenant files, for which a determination of reasonable rent was required, shows that for at least 98% of the units sampled the HPHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable

Objective 5c: The HPHA's quality control sample of tenant files show that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verification information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the HPHA used the appropriate utility allowances for the unit leased in determining the gross rent for at least 95% of the files sampled

Objective 5d: Conduct a review of utility rate data obtained within the last 12 months, and adjust the utility allowance schedule as appopriate

Objective 5e: Maintain documentation that an HPHA supervisor (or other qualified person) reinspected a minimum acceptable sample of units during the fiscal year as appropriate

Objective 5f: Maintain documentation that shows that HPHA took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority, including at least 2 outreach events/meetings

Objective 5g: Conduct and complete a reexamination for each participating family at least every 12 months

Objective 5h: Maintain the required number of active participants in the Family Self-Sufficiency Program

Goal 6: Reduce or eliminate single audit findings in the HPHA's annual compliance audit

Objective 6a:	Adhere to month-end closing procedures on account reconciliation for HPHA's interfund balances
Objective 6b:	Conduct an annual review of existing policies and procedures for HQS Inspections and enforcement to ensure current process is meeting full compliancy with the federal rules; make adjustments to procedures, as necessary
Objective 6c:	Maintain updated documentation that shows required monthly reviews are being performed on annual recertification and placement of tenant files.
Objective 6d:	Maintain an updated Uniformity of Tenant File Checklist under PMMSB to eliminate further errors and missing documents.
Objective 6e:	Conduct and complete a reexamination for each participating family at least every 12 months.
Objective 6f:	Provide ongoing support and training opportunities for necessary staff on accounting principles, operating procedures, enterprise software, and to keep abreast of changes in the federal rules.

Goal 7: Improve the Quality of Assisted Housing

Objective 7a:	Adopt a policy when determining income from assets for purposes of eligibility and subsidy determination in the Public Housing program and the Section 8 HCV program; update the policy determining the value of a checking account to be consistent with the policy determining the value of a savings account, by using the current balance to reduce administrative burden, excessive paperwork and added expense for the applicant
Objective 7b:	Adopt policy requiring live-in aides to establish legal residency in the United States to in order to receive subsidy for an additional bedroom in the Section 8 HCV program, and to occupy an additional bedroom in the public housing program
Objective 7c:	Update HPHA's Admissions and Continued Occupancy Policy (ACOP) to revise the "one-strike" admissions and termination policy to conform to the HUD Screening and Eviction Final Rule
Objective 7d:	Extend the length of time an applicant may be denied admissions after drug-related criminal activity or convictions over the minimum of 3 years as required by HUD regulations
Objective 7e:	Update the Admissions and Continued Occupancy Policy to implement the requirements new statutory or regulatory requirements
Objective 7f:	Establish a multi-skilled worker program to promptly repair and maintain units that become vacant on a regular basis for faster and more efficient turnover of units, including the establishment of a highly skilled force account for capital repairs

D. Need: The quality of life and economic vitality of the HPHA's public housing communities must be enhanced as a means to achieve healthier communities.

Goal 8: Provide an improved living environment

Objective 8a: Implement measures to de-concentrate poverty according to the HPHA's deconcentration policy

Objective 8b: Implement public housing security improvements, such as increasing lighting, video surveillance, resident identification cards, utilizing after-hours quite time, tenant participation with Resident Associations, and crime prevention through environmental design features; and enact legislation to address trespassing 24 hours a day

Objective 8c: Designate developments or buildings for particular resident groups (e.g. elderly or persons with disabilities) and/or pursue designated housing under HUD's definition of designated housing

Objective 8d: Redevelop public housing and other properties through public/private partnerships, with updated or new amenities for residents, such as public spaces and parking

Objective 8e: Install adaptable design elements to allow elderly tenants to age in place.

Objective 8f: Adopt rules to efficiently remove abandoned property from HPHA units to provide quicker turnaround of units

Objective 8g: Leverage Capital Funds to accelerate modernization projects, study feasibility of utilizing public/private partnerships for the redevelopment of public housing and pursue mixed finance redevelopment opportunities with various HUD programs such as RAD and CNI

Objective 8h: Demolish or dispose of obsolete public housing units and provide replacement housing; including processing of requests for right of entry and non-exclusive easements, where appropriate

Objective 8i: Continue to refer criminal cases to the eviction board in an expeditious manner to maintain the health and safety of the public housing community

Objective 8j: Enforce non-smoking policy and establish or coordinate with community programs for smoking cessation

Objective 8k: Encourage and support the formation of resident associations

Goal 9: Encourage Self-Sufficiency

Objective 9a: Assist tenants in training and employment opportunities by promoting and monitoring all contractors to comply with Section 3 requirements.

Objective 9b: Develop a system to track Section 3 efforts and results.

Objective 9c: Establish a Section 3 Registry for businesses to find potential low income individuals for employment opportunities.

E. Need: There is a need to improve the management and efficiency of federal government programs and resources, including the Section 8 Housing Choice Voucher Program and Federal Low-Income Housing.

Goal 10: Improve operational efficiency in the Housing Choice Voucher Program

Objective 10a: Continue to develop relationships with more partners in the recruitment and retention of landlords

Objective 10b: Increase efforts to lease up VASH vouchers for qualifying veterans by pursuing operational efficiency; and absorb VASH vouchers once a veteran has completed his/her service plan

Objective 10c: Adopt policy changes/updates under the VASH project based voucher program to provide for greater efficiencies and services for veteran participants

Objective 10d: Adopt policy changes and updates, including but not limited to, changes regarding new admissions, changes in family composition, additions to the household/voucher, continued participation, absence from the assisted dwelling unit, timing of HQS inspections, hardship waivers, maximizing budget authority, waiting list management, lottery systems for placement or termination, and any other administrative efficiencies.

Objective 10e: Review of the Section 8 Administrative Plan for possible changes and updates to increase efficiency and implement statutory and regulatory changes, including but not limited to HOTMA regulations

Goal 11: Increase assisted housing choices:

Objective 11a: Conduct outreach efforts to potential voucher landlords

Objective 11b: Provide Section 8 voucher mobility counseling

Objective 11c: Pursue designated housing for elderly-only project(s)

Objective 11d: HPHA will assess the feasibility of amending its preferences to include a preference for families with children

Goal 12: Improve the housing delivery system through cost-effective management of federal government programs and resources.

Objective 12a: Implement project based accounting and management for federal public housing.

Objective 12b: Update or revise policies, including but not limited to changes on admissions, continued occupancy, management, rent collections, write offs, inspections, no smoking, occupancy guidelines, citizen sponsors, transfers, waiting lists, and self-sufficiency to improve the management of public housing, create healthier communities, increase operational efficiencies, comply with regulatory/statutory requirements and/or the requirement to establish discretionary policies; work in consultation with the Resident Advisory Board and other resident organizations

Objective 12c: Consider converting some or all geographic waitlists to site-based waitlists.

Objective 12d: Review updated HUD rules and adopt administrative rule changes meant to reduce administrative costs, increase program efficiency, improve tenant benefits, or foster self-sufficiency.

Objective 12e: Implement energy efficient cost saving measures on all properties

F. Need: Provide an environment that enables families the opportunity for self-sufficiency and to further themselves economically.

Goal 13: Promote self-sufficiency and asset development of assisted households

Objective 13a: Increase the number and percentage of employed persons in assisted families by conducting annual activities such as job fairs and job training events.

Objective 13b: Engage supportive service providers to improve assistance recipients' employability.

Objective 13c: Engage supportive service providers to increase independence for the elderly or families with disabilities by continually attracting and providing supportive services.

Objective 13d: Provide measures and opportunities to increase the income of residents to complement de-concentration and income targeting.

Objective 13e: Evaluate the need and the feasibility of the HUD "Step Up" program to provide jobs and job training opportunities on HUD-assisted construction projects to residents of public housing and other low-income people.

Objective 13f: Pursue grant opportunities to fund self-sufficiency coordinator positions through HUD grants or other available and appropriate sources.

G. Need: To ensure an equal opportunity in housing for all Americans

Goal 14: Ensure equal opportunity and affirmatively further fair housing

Objective 14a: Undertake affirmative measures to ensure equal access to assisted housing regardless of race, color, religion, sex, national origin, creed, age, sexual orientation, gender identity, history of domestic violence, marital status, familial status, HIV infection and disability.

Objective 14b: Continue to implement the Section 504 and ADA transition plans.

Objective 14c: Maintain the Limited English Proficiency (LEP) training to non-English speaking and/or Limited English Proficiency speaking groups with an interpreter available on federal and state fair housing laws.

Objective 14d: Implement the action plan set forth in the Fair Housing Analysis of Impediments to be updated in 2015, subject to the availability of funds.

Objective 14e: Adopt a Homelessness Prevention Initiative that includes management's utilization of emergency rental assistance, financial management tools and supportive living services such as mental health and other wellness programs with the focus on those high risk individuals, such as youths, domestic violence victims, human trafficking survivors and the elderly.

H. Need: To improve general administrative proficiency within HPHA

Goal 15: Increase customer satisfaction

Objective 15a: Automate more functions to provide increased quality of service such as web-based applications, increase web capabilities, and interactive voice response system.

Objective 15b: Adopt a policy to pay landlords via electronic deposit into their account.

Goal 16: Concentrate on efforts to improve office management and operational efficiency:

Objective 16a: Continue to automate major operation components of the PHA computer software such as work order processing and tracking, materials, inventory, and fixed assets to improve the efficiency and accuracy of financial accounting and reporting.

Objective 16b: Continue to upgrade the computer network infrastructure with faster, more reliable, and redundant connections to increase overall productivity.

Objective 16c: Implement a content management system for more efficient retrieval of documents stored electronically on the HPHA network.

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. (FY2009-2014)

1. PHA Goal: Expand the supply of assisted housing
   - Apply for additional rent subsidies: Applications for HUD Specific Section 8 Housing Choice Vouchers will be submitted provided that HUD specific funding is available and HPHA meets the criteria for the specific funding.
   - Reduce public housing vacancies, not to exceed 5% vacancy rate.
   - As of June 30, 2012, there were 372 vacant units. As of October 31, 2013, there are 174 vacant units.
   - Of those 66 are scheduled for demo. *11/14/13*
   - HPHA will aim to maintain a 2% vacancy rate into the future
   - Current adjusted occupancy rate is 97% due to ongoing capital improvements and units in modernization

2. PHA Goal: Improve the quality of assisted housing
   - Improve public housing management (PHAS score) – HPHA currently maintains a 97% rent collection rate. HPHA completes 100% of emergency work orders within 24 hours and has met its goal to inspect 100% of units and systems using the Uniform Physical Condition Standard (UPCS). HPHA has completed system-wide upgrades to its network and computer software to increase the efficiency of administered programs. Additionally, HPHA's staff received HUD-provided training on rent calculation and internal PHAS training.
   - Improve voucher management: Attained a perfect SEMAP score of 100%: The 2012-2013 final assessment SEMAP score ranks HPHA as a "High Performer."
   - Increase customer satisfaction: HPHA has begun the development process to automate certain functions geared at enhancing customer service delivery and customer service satisfaction, including the redesign of the agency website and development of web-based applications. HPHA has implemented a no-smoking policy throughout all public housing properties.
   - Renovate or modernize public housing units: As of June 30, 2013, HPHA has federal dollars in the amount of $57,285,440 CFP funds and $134,728,839 State CIP funds appropriated and budgeted for a total of $192,014,270. HPHA has expended $29,452,316 in CFP and $35,231,516 in State CIP for a total of $64,683,832. Additionally, HPHA partnered with HUD to offer a workshop on federal relocation requirements for staff and local partners.
   - 7/20/12 – Kapa'a – Types C Vacant Unit; Des: $13,567

3. PHA Goal: Increase assisted housing choices
   - Geographical Wait List: Administrative rules implemented in December 2001.
   - Conduct ongoing outreach efforts to potential voucher landlords: Outreach activities to attract new voucher landlords began in March 2005, including owners of accessible units, and its ongoing on an annual basis.
   - Assisted 51 families under the Family Self-Sufficiency Program in FY 2016

4. PHA Goal: Provide an improved living environment
   - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments.
   - HPHA added increased lighting, surveillance cameras and 24-hour security patrols at properties with high crime activity. Efforts at Mayor Wright Homes have reduced overall crime by half.
   - HPHA implemented a multi-skilled worker pilot program to address vacant units in an expeditious matter

- HPHA conducted annual unit inspections and completed repair and maintenance on units found to have deficiencies; emergency work orders were addressed or abated within 24 hours
- HPHA improved its maintenance and repair of units as demonstrated in the higher scores received for the REAC inspections by HUD

5. PHA Goal: Promote self-sufficiency and asset development of assisted household
   - HPHA continues to operate the Tenant Aide Program for federal public housing residents.
   - HPHA continues to fill vacant positions in the Property Management Services Branch to assist tenants in accessing resident services and case management.

6. PHA Goal: Asset Management
   - HPHA has a HUD Technical Assistance consultant team reviewing the current AMP structure. When their report is final, AMPP structure changes might be made based on the findings.
   - HPHA continues to work cooperatively with HUD to update and complete the Declaration of Trust filings

7. PHA Goal: Evaluate the current administration of HPHA's Section 8 Housing Choice Voucher Program
   - 2014, 2015– rated as "High Performer".
   - 2013 – Perfect SEMAP score.
   - Began the process of removing local preferences to lease up people off the waitlist by date and time to ensure fairness.
   - Purged waitlist to remove non-responsive applicants.
   - Adopted temporary compliance measures proposed by HUD.
   - Completing re-certifications, inspections and disbursing timely payments to landlords.

8. PHA Goal: Ensure equal opportunity and affirmatively further fair housing
   - HPHA evaluated agency-specific limited English proficiency (LEP) needs in order to supplement the HPHA's LEP plan and update procedures accordingly.
   - HPHA provided training to staff on applicable laws, regulations, policies and procedures on the following topics: reasonable accommodations, assistance animals, limited English proficiency, and fair housing.
   - HPHA offered a full day fair housing training for all employees and residents.
   - HPHA evaluated the proposed rule on affirmatively furthering fair housing to identify changes to the analysis of fair housing impediments planning process.
   - HPHA continues to participate in the fair housing consortium with Hawaii Civil Rights Commission, Legal Aid Society of Hawaii, Department of Hawaii Home Lands, local county fair housing coordinators, and HUD FHEO to discuss impediments to fair housing.
   - HPHA continues to perform repair and modernization work and where possible continues to include the design and construction of accessible units in order to exceed the minimum requirement for 5% ADA units and 2% vision and hearing impaired units

9. PHA Goal: Improve the housing delivery system through cost-effective management of federal and state government programs and resources
   - Continue to automate major operation components of the PHA computer software such as work order processing and tracking materials, inventory, and fixed assets. Section 8, Low-Income Public Housing, waitlist and financial modules were recently upgraded.
   - Continue to upgrade the computer network infrastructure with faster, more reliable, and redundant connections to increase overall productivity. Upgrade computers with newer models, to provide faster response time for users, and standardize versions of office software.
   - Ongoing SEMAP and PHAS training is being provided to HPHA staff.

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 HPHA supports the goals and objectives of VAWA and will comply with its requirements. The HPHA is currently working to implement policies to the Public Housing Program as required by VAWA. A review of policies and procedures will be conducted to ensure that all requirements are met or exceeded.

Recognizing the seriousness, HPHA has in place a Preference designation in its Admission Policy for victims of domestic violence. The HPHA has completed the following in its efforts to support and comply with VAWA provisions:

- The Section 8 Administrative Plan has been updated to reflect HPHA policy on the prohibition against denial of assistance to victims of domestic violence, dating violence, and stalking as required by VAWA.
- The fair housing policy in the HPHA Admissions and Continued Occupancy Policy for the Federally Assisted Public Housing Program has also been updated to reflect compliance with the provisions of VAWA.
- Established a list of domestic violence service providers statewide to provide referrals to aid applicant or resident victims.
- Information regarding the VAWA is given to all HPHA public housing residents at annual recertification and residents are required to sign a lease addendum acknowledging the VAWA protections. This notice and lease addendum are also available in Cantonese, Chuukese, Ilocano, Korean, Samoan, and Tagalog.
- Information regarding the VAWA is also distributed to Section 8 tenants. New Section 8 leases also require the HUD Tenancy Addendum which include provisions relating to VAWA.
- Property management staff were given a refresher session on the protections of VAWA in 2012.
- HPHA provides a preference for victims of domestic abuse under the section 8 and public housing programs.

The HPHA's Board of Directors has adopted an interim VAWA Policy. Staff is currently developing a final policy for adoption pending reauthorization of VAWA. Non-substantive changes are not considered a substantial deviation to the PHA plan, and will be adopted by the HPHA Board of Directors, and not through the PHA Plan process. A copy of the HPHA's policy is included as Attachment A.

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.

In accordance with 24 CFR §903.7(r)(2) which requires public housing authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5-Year Plan and significant amendments or modification to the 5-Year Plan and Annual Plan, the following definitions are used:

Substantial Deviation: A substantial change in the goals identified in the Five-Year Plan. For example, making a formal decision not to pursue a listed goal; or substituting an entirely different set of activities to achieve the goal.

Significant Amendment/Modification: Adding or eliminating major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities); or modifying a strategy such that a substantial transfer of resources away from others is necessary in order to carry it out. Under this PHA Five Year Plan, the HPHA is clarifying that any change required to comply with state or federal rule, law, or regulation, where the HPHA is not able to adopt discretionary policy, would not be considered a significant amendment or modification. However, the HPHA would continue to work with the Resident Advisory Board, Resident Associations, and staff for comments.

For Capital Fund Program projects that deviate from the Capital Fund Program Five-Year Action Plan and the Capital Fund Program Annual State/Performance and Evaluation Reports, only projects that meet the following criteria shall require 5-Year and Annual Plan Amendment: the amount of funds being required exceeds $10 Million; number of units being worked on comprises more than 15% of a developments ACC unit count; or work requires the relocation of more than two neighboring occupied units. Where work is not specifically budgeted, monetary placeholders will be provided in lieu of specific development language.

B.6	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the 5-Year PHA Plan? Y N ☒ ☐ (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. **Included as Attachment B**
B.7	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. **Included as Attachment C**