# Annual PHA Plan (Standard PHAs and Troubled PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

**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, including changes to these policies, 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.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

#### 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 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 550, and that was designated as a standard performer in the most recent PHAS or 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

| Α.  | PHA Information.   |          |                             |           |                |                              |
|-----|--|----------|-----------------------------|-----------|----------------|------------------------------|
| A.1 | PHA Name: HOUSING AUTHORITY OF THE CITY OF YORK PHA Code: PA022  PHA Type: Standard PHA Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): January 1, 2022  PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  Number of Public Housing (PH) Units 1032 Number of Housing Choice Vouchers (HCVs) 1586  Total Combined Units/Vouchers  PHA Plan Submission Type: Annual Submission Revised Annual Submission  Availability of Information. 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. 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 website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. |          |                             |           |                | IA Plan are<br>Project (AMP) |
|     | 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  No. of Units in Each Program(s)  |          |                             |           | n Each Program |                              |
|     | Participating PHAs   | PHA Code | Program(s) in the Consortia | Consortia | PH             | HCV                          |
|     | Lead PHA:  |          |                             |           |                |                              |
|     |  |          |                             |           |                |                              |

| Plan Elements  |  |  |  |  |
|--|--|--|--|--|
| Revision of Existing PHA Plan Elements.  |  |  |  |  |
| (a) Have the following PHA Plan elements been revised by the PHA?  |  |  |  |  |
| Y       N         □       Statement of Housing Needs and Strategy for Addressing Housing Needs         □       Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.         □       Financial Resources.         □       Rent Determination.         □       Operation and Management.         □       Grievance Procedures.         □       Homeownership Programs.         □       Safety and Crime Prevention.         □       Pet Policy.         □       Asset Management.         □       Substantial Deviation.         □       Significant Amendment/Modification  |  |  |  |  |
| (b) If the PHA answered yes for any element, describe the revisions for each revised element(s):   |  |  |  |  |
| (c) The PHA must submit its Deconcentration Policy for Field Office review.  York Housing Authority continues to evaluate and implement measures to deconcentrate poverty by leasing to higher income public housing households.   |  |  |  |  |
| New Activities.  |  |  |  |  |
| (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?  Y N  Hope VI or Choice Neighborhoods.  Mixed Finance Modernization or Development.  Demolition and/or Disposition.  Designated Housing for Elderly and/or Disabled Families.  Conversion of Public Housing to Tenant-Based Assistance.  Conversion of Public Housing to Tenant-Based Assistance.  Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.  Occupancy by Over-Income Families.  Non-Smoking Policies.  Non-Smoking Policies.  Octupancy by Police Officers.  Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.  The York Housing Authority is planning to submit the following applications:  1. Rental Assistance Demonstration (RAD)/Section 18 Blend applications:  1. Rental Assistance Demonstration (RAD)/Section 18 Blend applications for Parkway Homes (PA22-3) (16 1-BR; 98 2-BR; 56 3-BR; 18 4-BR) and Parkway Extended (PA22-4) (1 maintenance shop; 24 1-BR; 20 2-BR; 22 3-BR; 12 4-BR; 4 5-BR) and 16 1-BR (Smyer & North Street) from PA22-5-b (City Scattered Site)  2. Disposal of 4 from County Scattered Site (PA22-12) due to increased maintenance and obsolescence of building systems. The 13 units listed below will replaced with units in communities that are close to employment, quality schools with public transportation that reduce maintena |  |  |  |  |
|  |  |  |  |  |

The York Housing Authority (YHA), PA022, **did not** have any significant amendment or modification, or substantial deviation modifications, that would require a statement of significant amendment to the CFP Five Year Action Plan based on the Capital Fund Rule

The Housing Opportunity Through Modernization Act (HOTMA) was signed into law in July 2016. On February 14, 2023, HUD published the final rule implementing Sections 102, 103 and 104 which addresses:

- Over-income Households in Public Housing Section 103
  - July 2023, public housing households determined to be over-income were notified of how Section 103 impacts the residency in public housing.
- o Income Reviews Section 102 will be implemented July 2024
- o Asset Limits Section 104 will be implemented July 2024

As of July 1, 2024, the York Housing Authority will implement the Housing Opportunity Through Modernization Act (HOTMA). YHA will publish and have public hearing starting May 2024 on HOTMA regulatory changes Public Housing and Section 8 program polices.

Attached are the HUD Resource Sheets (Attachment #1) that will be incorporated into the YHA Admissions and Continued Occupancy Plan for public housing applicants and residents and the YHA Administrative Plan for all Section 8 applicants and participants in accordance with HUD regulations. The resource sheets included:

- Income and Assets Fact Sheet for Section 102 and 104
- Income and Exclusions Resource Sheet
- o Student Financial Assistance Resource Sheet
- o Hardship Exemptions Resource Sheet

#### **B.3** | Progress Report. Please see attached Capital Fund Five Year Action Plan (Attachment #2)

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

#### Section 8 Program:

- Improve and maintain Section Eight Management Assessment Program (SEMAP) score by addressing concerns in the Corrective Action Plan; training of all staff.
- 2. Averaged at least 96% lease up in the Housing Choice Voucher program.
- 3. Averaged Special Needs Assessments Program (SNAP)/Shelter + Plus Care lease up at twenty (20) for the year.
- Continue to review Housing Choice Voucher Payment Standards and will continue at 100% of Fair Market Rents (FMR) for all bedrooms in the City of York and up to 110% for County of York.
- 5. Coordinated landlord outreach to recruit new landlords focusing on new landlord in York County

#### ii. Public Housing Program:

- 1. Maintain 98+ % occupancy throughout the year. 99% in 2020 due to COVID-19 restrictions.
- 2. Unit turnaround time was at 35 days and we are working to reduce the number of days to less than 28.
- 3. Retain bilingual employees and continue to utilize other resources to address translation needs of applicants and residents.
- 4. Approved 10 resident household transfers to address reasonable accommodation needs.
- 5. Provided reasonable accommodations to 73households.
- 6. Able to continue rehabilitation and extraordinary maintenance of our properties.
- Continue to certify new staff with concentration on training maintenance on procedures and hands-on training with modern HVAC and electric systems.

#### iii. Supportive Services:

- Provide Family Self Sufficiency Programs to guide residents with developing an individualized plan and setting attainable
  goals to learn about and improve credit scores, education and employment opportunities while the overall economy limits
  staff's ability to assist residents with attaining homeownership.
- 2. Work cohesively with agencies, partners and resident councils to offer quality of life services such as after-school programming, youth activities, food distribution and locally farmed fresh food, services for the elderly and disabled, mental health services, cultural opportunities, credit/budget counseling, Family Self-Sufficiency Programs. YHA has a social service agreement with Senior-Life.
- 3. Established relationship with FedEx and other large employers for job placement and employment opportunities.
- 4. Collaborated with York City Police at the Wellington Center for the benefit of YHA youth.
- 5. Scouting and 4-H programs are active in the Wellington and Parkway developments.
- 6. Broad Park/ROSS Grant coordinator is working with WellSpan Hospital to decrease number of Broad Park Residents using the local emergency room visits and to increase visits to medical, counseling, and other specialized health care professional that will assist in improving quality life. The ROSS is also planning financial literacy, sessions with a dietitian and one on casemanagement with Broad Park residents.
- iv. <u>Creating Opportunities in Neighborhood Environments, Inc. (CONE):</u> YHA continues collaboration with CONE to increase housing opportunities in both York City and County.
- **B.4** Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

2020-2024 Rev 1 Approved

| B.5 | Most Recent Fiscal Year Audit.   |  |  |  |
|-----|--|--|--|--|
|     | (a) Were there any findings in the most recent FY Audit?   |  |  |  |
|     | Y N □ ⊠  |  |  |  |
|     | (b) If yes, please describe:   |  |  |  |
| C.  | Other Document and/or Certification Requirements.  |  |  |  |
| C.1 | Resident Advisory Board (RAB) Comments.  (a) Did the RAB(s) have comments to the PHA Plan? Due to an abundance of caution due to COVID-19 restrictions, there were no RAB meetings in 2020.  Y No  □ ☑  (b) 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.   |  |  |  |
| C.2 | 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.  |  |  |  |
| C.3 | Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.   |  |  |  |
|     | Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.  |  |  |  |
| C.4 | Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.  |  |  |  |
|     | (a) Did the public challenge any elements of the Plan?   |  |  |  |
|     | Y N<br>□ ⊠   |  |  |  |
|     | If yes, include Challenged Elements.   |  |  |  |
| C.5 | Troubled PHA.  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  □ □ ⊠   |  |  |  |
|     | (b) If yes, please describe:   |  |  |  |
| D.  | Affirmatively Furthering Fair Housing (AFFH).  |  |  |  |
| D.1 | Affirmatively Furthering Fair Housing (AFFH).  |  |  |  |
|     | Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. |  |  |  |
|     |  |  |  |  |

#### **Fair Housing Goal:**

## Describe fair housing strategies and actions to achieve the goal

YHA is continuing to outreach to local property owners in York County to allow HCV participates to move to areas where there is not a concentration of low-income housing. YHA will have staff member to dedicate to increasing landlord participation and building stronger relationships the current landlords.

All public housing and section 8 staff completed Fair Housing training conducted by the PA Human Relation Commission. YHA is commented to continue to require annual Fair Housing Training for all YHA staff.

## **Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs**

- PHA Information. All PHAs must complete this section. (24 CFR §903.4)
  - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or 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. (24 CFR §903.23(4)(e))
    - PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))
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  - В.

| aı | <b>Elements.</b> All PHAs must complete this section.  |
|----|--|
| 1  | Revision of Existing 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." (24 CFR §903.7)   |
|    | □ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)). |
|    | The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ( $\underline{24\ CFR\ \$903.7(a)(2)(i)}$ ) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. ( $\underline{24\ CFR\ \$903.7(a)(2)(ii)}$ )  |
|    | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (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 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. (24 CFR §903.7(c))  |
|    | ☐ <b>Rent Determination.</b> A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))   |
|    | Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and 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. (24 CFR §903.7(e))  |
|    | Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))   |
|    | ☐ Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))  |
|    | Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(1)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for   |

the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban

☐ Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of

Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(1))

coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) 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. (24 CFR §903.7(m)(5)) Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n)) Asset Management. State 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. (24 CFR §903.7(q)) 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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices. If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no." ☐ HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/hope6. (Notice PIH 2011-47) 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 Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/hope6/mfph#4 Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo\_dispo/index.cfm. (24 CFR §903.7(h)) Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. 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, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C)) Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received 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. (24 CFR §903.7(j)) Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices. Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

**B.2** 

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

| Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b)) |
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| Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))   |
| Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).  |
| Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).  |
| ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  |
| For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.   |
|   |

- **B.3 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 §903.7(r)(1))
- B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
- **B.5** 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 §903.7(p))
- C. Other Document and/or Certification Requirements.
  - C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on 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 §903.13(c), 24 CFR §903.19)
  - C.2 Certification by State of 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
  - C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. 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)).
  - C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
  - C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)
- D. Affirmatively Furthering Fair Housing (AFFH).

**D.1** Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) .... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 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.

## ATTACHMENTS TO ANNUAL PLAN

Attachment #1 – Housing Opportunity Through Modernization Act (HOTMA).

• We attach supporting information from the HUD Website regarding HOTMA. These will be implemented for both Public Housing and Section 8.

Attachment #2 - Capital Fund - Five Year Action Plan

## ATTACHMENT #1 – Housing Opportunity Through Modernization Act (HOTMA)

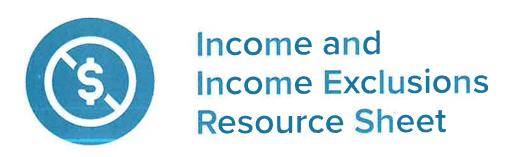
#### Housing Opportunity Through Modernization Act (HOTMA)

The Housing Opportunity Through Modernization Act (HOTMA) of 2016 was signed into law by President Obama in July 2016. On February 14, 2023, HUD published the final rule implementing Sections 102, 103, and 104 of HOTMA which addresses:

- Over-income Households in Public Housing Section 103
- Income Reviews Section 102
- Asset Limits Section 104
- Most provisions effective Jan. 1, 2024 (except 103 which was implemented June 14, 2023) with complete implementation no later than Jan. 1, 2025

Please find attached the HUD Resource Sheets that will be incorporated into the WHA Admissions and Continued Occupancy Plan in accordance with the HUD regulations.

- Income and Assets Fact Sheet
- Income and Exclusions Resource Sheet
- Student Financial Assistance Resource Sheet
- Hardship Exemptions Resource Sheet



For more information refer to the full HOTMA Income and Assets Training Series, including the Income Fact Sheet.

#### Annual Income 24 CFR 5.609(a)

Annual income includes, with respect to the family:

- All amounts, not specifically excluded below, received from all sources by each member of the family 18 years or older or is the head of household or spouse of the head of household, plus
- · Unearned income by or on behalf of each dependent who is under 18 years of age, and
- Imputed returns on net family assets exceeding \$50,000 (adjusted annually using the CPI-W) when the value of the actual returns from a given asset cannot be calculated. Imputed returns are based on the current passbook savings rate, as determined by HUD. (**Note:** if it is possible to calculate actual returns from an asset, the PHA should use that amount as income).

## **EXCLUSIONS**

## Federally Mandated Income Exclusions 24 CFR 5.609(b)(22)

Amounts that HUD is required by federal statute to exclude as income for determining eligibility or benefits. HUD will publish an updated notice in the Federal Register to identify the benefits that qualify for this exclusion. Updates will be published when necessary.

 Mandatory Income exclusions related to ABLE accounts will be detailed here. PHAs can refer to Notice PIH 2019-09/H-2019-06, or any subsequent notice on the subject, for details on when ABLE account income is excluded.

#### Assets 24 CFR 5.609(b)(1)

Imputed returns: Any imputed return on an asset when net family assets total \$50,000 or less (adjusted by HUD annually per CPI-W) and no actual income from the net family assets can be determined. (Note that: Actual returns from assets are included in income.)



This material is based upon work supported, in whole or in part, by Federal award number NAL-C-17-094-05 awarded to NALCAB by the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. Neither the United States Government, nor any of its employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately-owned rights. Reference herein to any individuals, agencies, companies, products, process, services, service by trade name, trademark, manufacturer, or otherwise does not constitute or imply an endorsement, recommendation, or favoring by the author(s), contributor(s), the U.S. Government or any agency thereof. Opinions contained herein are those of the author(s) and do not necessarily reflect the official position of, or a position that is endorsed by, HUD or any Federal agency.

## Non-recurring income 24 CFR 5.609(b)(24)

Income that will not be repeated in the coming year based on information provided by the family. Some examples of non-recurring income include:

- U.S. Census Bureau for employment income (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not resulting in permanent employment.
- Direct federal or state payments for economic stimulus or recovery.
- State or federal refundable tax credits or state or federal tax refunds received directly at the time they are received directly by the family.
- Gifts for significant life events or milestones (e.g., holidays, birthdays, wedding gifts, baby showers, anniversaries).
- Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization.
- · Lump-sum additions to net family assets, including but not limited to **lottery** or other contest winnings.

**Note that:** Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income, even if the source, date, or amount of the income varies.

### Self-employment Income 24 CFR 5.609(b)(28)

Gross income received through self-employment or operation of a business; with the exception of the following which **shall be considered income**:

- Net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in IRS regulations; and
- Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.



**Note:** gross income is the total income that a business brings in and is not reflective of the costs of operating a business or of being self-employed

#### Minors Earned Income 24 CFR 5.609(b)(3)

All earned income of all children under the age of 18, including foster children.

## Adoption assistance payments 24 CFR 5.609(b)(15)

Earned income in excess of the amount of the deduction for a dependent in § 5.611,

 Deduction is currently \$480\* per child. The end result is that all adoption assistance payments will be excluded.

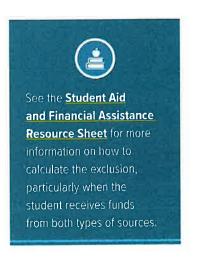
## Earned Income of Dependent Students 24 CFR 5.609(b)(14)

Earned income of dependent full-time students in excess of the amount of the deduction for a dependent.

• Deduction is currently \$480\* per dependent. The end result is that these payments will not be counted.

#### Title IV HEA Assistance 24 CFR 5.609(9)(i)

Any assistance that section 479B of the Higher Education Act of 1965, as amended (20 U.S.C. 1087uu), requires to be excluded from a family's income including Bureau of Indian Affairs or Department of Education student assistance programs. These amounts are only excluded up to the cost that covers tuition and other required fees in Section 8 households if the student is the head of household or that person's spouse.



### Other Student Financial Assistance 24 CFR 5.609(9)(ii)

Student financial assistance, not excluded under the HEA for "actual covered costs" of higher education paid directly to the student or to the educational institution on the student's behalf.

## Educational Savings Account 24 CFR 5.609(b)(10)

Income and distributions from any Coverdell educational savings account of or any qualified tuition program under IRS sections 529 and 530.

## Baby bonds 24 CFR 5.609(b)(10)

Income earned by government contributions to, or distributions from, 'baby bond' accounts created, authorized, or funded by federal, state, or local government.

## Foster Children / Adults Payments 24 CFR 5.609(b)(4)

Payments received for the care of foster children or adults, including state kinship, guardianship care payments, or tribal kinship payments.

\* As adjusted annually by CPI-W and rounded to the next lowest multiple of \$25.

## Foster Children/ Adults Income 24 CFR 5.609(b)(8)

Income of foster child or adult (as defined in 24 CFR 5.403 and 5.603).

#### Live-in Aide 24 CFR 5.609(b)(8)

Income of a live-in aide.



Note on Foster Children/Adults and Live-in Aides: Foster adults and foster children are members of the household and therefore considered when determining appropriate unit size and utility allowance. However, they are not considered members of the "assisted family" in determining annual and adjusted income or net family assets; nor are the assets of foster adults or children taken into consideration for purposes of asset limitations. A live-in aide is treated similarly for purposes of income and assets.

## State Payments to Allow Individuals with Disabilities to Live at Home 24 CFR 5.609(b)(19)

These payments must be made:

- by or authorized by a state Medicaid managed care system or other state agency
  - » Includes: state Medicaid-managed care system, other state agency, or authorized entity
- · to a family to enable a family member who has a disability to reside in the family's assisted unit.



## Note on HOTMA changes to State Payments to Allow Individuals with Disabilities to Live at Home:

- HOTMA expands the exclusion to cover all payments by the state Medicaid-managed care system, other state agency, or authorized entity, for caregiving services to enable a family member with a disability to live in the assisted unit.
- No change if the family already received such payment that was excluded from income
- Previous requirement that these payments offset the cost of services or equipment has been eliminated.

## Plan to Attain Self-Sufficiency (PASS) 24 CFR 5.609(b)(12)(i)

Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).

### Trust distributions 24 CFR 5.609(b)(2)

Irrevocable trust or revocable trust outside of family or household control, excluded from the definition of net family assets under § 5.603(b),

- · Distributions of the principal, or corpus, of the trust, and
- Distributions of income from the trust used to pay the costs of health and medical care expenses for a minor.

Revocable trust or a trust under the control of the family or household: any distributions from the trust are excluded from income.

• Except that any actual income earned by the trust, regardless of whether it is distributed, shall be considered income to the family at the time it is received by the trust.



**Note:** given that the corpus (or principal) of a trust is not new money coming in for the family, any distributions of a trust's principal, regardless of the form of the trust, are excluded. As a general rule, PHAs and owners must count any distributions of income from an irrevocable trust or a trust not under the control of the family (e.g., distributions of earned interest) as income to the family with the exception of distributions used to pay the health and medical care expenses of a minor.

## Reimbursements for Health and Medical Care Expenses 24 CFR 5.609(b)(6)

Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member.

## Insurance payments and settlements for personal or property loss 24 CFR 5.609(b)(5)

Including, but not limited to: payments through health insurance, motor vehicle insurance, and workers' compensation.

## Retirement plan 24 CFR 5.609(b)(26)

Income received from any account under an IRS-recognized retirement plan. However, any distribution of **periodic payments** from these accounts shall be income at the time they are received by the family. Retirement accounts include:

- · Individual retirement arrangements (IRAs)
- · Employer retirement plans, and
- · Retirement plans for self-employed individual

## Military 24 CFR 5.609(b)(11)

The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

#### Veterans 24 CFR 5.609(b)(17)

Payments related to aid and attendance for veterans under 38 U.S.C. 1521.

## Lawsuit Settlements 24 CFR 5.609(b)(7)

Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a member of the family having a **disability**.

## Reparations for Persecution 24 CFR 5.609(b)(13)

Reparation payments paid by a foreign government for claims by people persecuted during the Nazi era.

## Tribal Claims Payments 24 CFR 5.609(b)(21)

Payments received by tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States. This includes payments from tribal trust settlements. Payments must be excluded from gross income under the Internal Revenue Code or other federal law.

## Civil Rights Settlements and Judgements 24 CFR 5.609(b)(25)

Civil rights settlements or judgments, including settlements or judgments for back pay.

## Reimbursements from other publicly assisted programs

#### 24 CFR 5.609(b)(12)(ii)

Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (e.g., special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program.

## Resident Services Stipend 24 CFR 5.609(b)(12)(iii)

Resident service stipends not to exceed \$200 per month. This is a modest amount provided to a resident for performing a service for the PHA, on a part-time basis, that enhances the quality of life in the development.

## Employment training programs 24 CFR 5.609(b)(12)(iv)

Incremental earnings and benefits from training programs funded by HUD or qualifying federal, state, tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff.

• Excluded amounts must be received under employment training programs with clearly defined goals and objectives and only excluded during participation in the program unless the amounts are excluded as Federal Financial Aid (§ 5.609(b)(9)(i)).

## Family Self Sufficiency Account 24 CFR 5.609(b)(27)

Income earned on amounts placed in a family's FSS.

## Housing "gap" payments 24 CFR 5.609(b)(23)

Replacement housing "gap" payments that offset increased rent and utility costs to families that are displaced from one federally subsidized housing unit and move into another federally subsidized housing unit (49 CFR part 24).

If the gap is reduced or eliminated because of a subsequent move by the tenant or change in the subsidy, and the tenant continues to receive the payment, the payment that is no longer needed to close the gap should be counted as income.

## Deferred Supplemental Security Income, Social Security benefits, or Department of Veterans Affairs disability benefits 24 CFR 5.609(b)(16)

Deferred periodic amounts from:

- Supplemental Security Income and Social Security benefits that are received as a lump sum or in prospective monthly amounts, or
- Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts.

## Property Tax Rebates 24 CFR 5.609(b)(18)

Refunds or rebates under state or local law for property taxes paid on the dwelling unit.

### Loan Proceeds 24 CFR 5.609(b)(20)

The net amount disbursed by a lender to a borrower, under the loan terms. Funds may be received by the family or a third party (e.g., educational institution or car dealership).

## Annual Income Exclusions 24 CFR 5.609(b)

## **Income Exclusions Table**

| Category                    | Exclusion   | CFR                    | Description  |
|-----------------------------|---|------------------------|--|
| Other                       | Federally Mandated<br>Income Exclusions                                     | 24 CFR 5.609(b)(22)    | Amounts that must be excluded by federal statute. HUD will publish a Federal Register notice that includes the qualifying benefits.  |
| Assets                      | Imputed Income from Assets  | 24 CFR 5.609(b)(1)     | Any imputed return on an asset when net family assets total \$50,000 (adjusted annually) or less and no actual income from the net family assets can be determined.                  |
| Non-recurring income        | Non-recurring income  | 24 CFR 5.609(b)(24)    | Income that will not be repeated in the coming year based on information provided by the family.   |
| Self-employment             | Gross Self-employment Income  | 24 CFR 5.609(b)(28)    | Gross income received through self-employment or operation of a business   |
| Dependents                  | Minors (children under<br>the age of 18 years)                              | 24 CFR 5.609(b)(3)     | All earned income of all children under the age of 18, including foster children.  |
| Dependents                  | Adoption assistance payments  | 24 CFR 5.609(b)(15)    | Adoption assistance payments for a child in excess of the amount of the dependent deduction.   |
| Students                    | Earned Income of<br>Dependent Students                                      | 24 CFR 5.609(b)(14)    | Earned income of dependent full-time students in excess of the amount of the dependent deduction.  |
| Students                    | Title IV HEA Assistance   | 24 CFR 5.609(b)(9)(i)  | Any assistance that Section 479B of the Higher Education Act (HEA) of 1965, as amended, requires to be excluded from a family's income.  |
| Students                    | Other Student<br>Financial Assistance                                       | 24 CFR 5.609(b)(9)(ii) | Student financial assistance, not excluded under the HEA, for actual covered costs of higher education.  |
| Students                    | Educational Savings Account   | 24 CFR 5.609(b)(10)    | Income and distributions from any Coverdell educational saving account of or any qualified tuition program under IRS section 530 or any qualified tuition program under section 529. |
| Baby bonds                  | Baby bonds  | 24 CFR 5.609(b)(10)    | Income earned by government contributions to, or distributions from, 'baby bond' accounts created, authorized or funded by federal, state or local government.                       |
| Foster children /<br>adults | Payments for Foster<br>Children / Adults                                    | 24 CFR 5.609(b)(4)     | Payments received for the care of foster children or adults, including State kinship, guardianship care payments, or tribal kinship payments.  |
| Foster children / adults    | Income of foster<br>children / adults                                       | 24 CFR 5.609(b)(8)     | Income of a live-in aide, foster child, or foster adult as defined in 24 CFR 5.403 and 5.603.  |
| Live-in Aide                | Income of a Live-in Aide  | 24 CFR 5.609(b)(8)     | Income of a live-in aide, foster child, or foster adult.   |
| People with<br>Disabilities | ABLE accounts   | 24 CFR 5.609(b)(22)    | Will be included in federally mandated excluded amounts.<br>Notice PIH 2019-09/H-2019-06 details when ABLE account<br>income is excluded.  |
| People with<br>Disabilities | State Payments to Allow<br>Individuals with Disabilities<br>to Live at Home | 24 CFR 5.609(b)(19)    | Payment made by an authorized by a state Medicaid managed care system or other state agency to a family to enable a family member to live in the family's assisted unit.             |
| People with<br>Disabilities | Plan to Attain Self-Sufficiency<br>(PASS)                                   | 24 CFR 5.609(b)(12)(i) | Amounts set aside for use under a Plan to Attain Self-Sufficiency (PASS).  |
| People with<br>Disabilities | Reimbursements for Health and Medical Care Expenses                         | 24 CFR 5.609(b)(6)     | Amounts for, or in reimbursement of, health and medical care expenses for any family member.   |

(continued)

| Category                           | Exclusion  | CFR                      | Description  |
|------------------------------------|--|--------------------------|--|
| Trusts                             | Trust distributions  | 24 CFR 5.609(b)(2)       | Any distributions of a trust's principal are excluded. PHAs and owners must count any distributions of income from an irrevocable trust or a trust not under the control of the family (e.g., distributions of earned interest) as income to the family with the expectation of distributions used to pay the health and medical care expenses of a minor. |
| Insurance                          | Insurance payments and settlements for personal or property loss                               | 24 CFR 5.609(b)(5)       | Insurance payments and settlements for personal or property loss including, but not limited to: payments through health insurance motor vehicle insurance, and workers' compensation.  |
| Retirement                         | Retirement plan  | 24 CFR 5.609(b)(26)      | Income received from any account under an IRS-recognized retirement plan. However, periodic payments are income at the time of receipt.  |
| Military                           | Hostile fire special payment   | 24 CFR 5.609(b)(11)      | The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.   |
| Veterans                           | Veterans aid and attendance payments   | 24 CFR 5.609(b)(17)      | Payments related to aid and attendance for veterans under 38 U.S.C. 1521.  |
| Lawsuits                           | Lawsuit Settlements  | 24 CFR 5.609(b)(7)       | Amounts recovered in a civil action or settlement based on malpractice, negligence and other breach of duty claim resulting in a family member becoming disabled.  |
| Lawsuits                           | Reparations for Persecution  | 24 CFR 5.609(b)(13)      | Reparation payments paid by a foreign government for claims by people persecuted during the Nazi era.  |
| Lawsuits                           | Tribal Claims Payments   | 24 CFR 5.609(b)(21)      | Payments received by tribal members from claims relating to the mismanagement of assets held in trust by the United States.  |
| Lawsuits                           | Lawsuits related to civil rights   | 24 CFR 5.609(b)(25)      | Civil rights settlements or judgments, including settlements or judgments for back pay.  |
| Reimbursements                     | Reimbursements from publicly assisted programs   | 24 CFR 5.609(b)(12)(ii)  | Amounts received by a participant in other publicly assisted programs for or in reimbursement of expenses to allow program participation (e.g., special equipment, clothing, transportation, child care, etc.).  |
| Resident Services<br>Stipend       | Resident Services Stipend  | 24 CFR 5.609(b)(12)(iii) | Resident service stipends of \$200 or less per month for performing a part-time service for the PHA that enhances the quality of life in the development.  |
| Employment<br>training<br>programs | Employment training programs   | 24 CFR 5.609(b)(12)(iv)  | Incremental earnings and benefits from training programs HUD and qualifying employment training programs and training of a family member as resident management staff.   |
| FSS                                | Family Self Sufficiency Account  | 24 CFR 5.609(b)(27)      | Income earned on amounts placed in a family's FSS account,   |
| Housing gap payments               | Housing "gap" payments   | 24 CFR 5.609(b)(23)      | Replacement housing "gap" payments to offset increased rent and utility costs to families displaced from one federally subsidized housing unit and another.  |
| Benefits                           | Deferred Supplemental Security<br>Income, SS income and benefits,<br>or VA disability benefits | 24 CFR 5.609(b)(16)      | Deferred periodic amounts from: SSI, Supplemental Security Income and benefits or VA disability benefits that are received in a lump sum or prospective monthly amounts.   |
| Property tax rebates               | Property Tax Rebates   | 24 CFR 5.609(b)(18)      | Refunds or rebates under state or local law for property taxes paid on the dwelling unit.  |
| Loans                              | Loan Proceeds  | 24 CFR 5.609(b)(20)      | The net amount disbursed by a lender to a borrower or a third party (e.g., educational institution or car dealership).   |



This sheet provides an overview of the changes related to income reviews and asset limitations from the implementation of HOTMA Sections 102 and 104.

Income Definitions — 24 CFR 5.609 (a): Income is now defined broadly with an expanded and clarified list of income exclusions. Annual income includes all amounts received from all sources by each adult family member 18 years or older or the head of household or their spouse, plus unearned income by or on behalf of each dependent under 18 years, plus income from assets.

- Income Exclusions—24 CFR 5.609(b): See the Income and Exclusions Resource Sheet for the list
  of all excluded amounts.
- Student Financial Assistance 24 CFR 5.609(b)(9): See the <u>Student Financial Assistance Resource</u> <u>Sheet</u> for information on deductions, exclusions, and calculating exclusions.

Income from Assets — 24 CFR 5.609(a): In general, income from assets is considered income. If it is possible to calculate actual returns from an asset, the PHA should use that amount. If it is not possible to calculate an actual return on an asset, the PHA must impute income from assets based on the current passbook savings rate as determined by HUD when the family has net assets over \$50,000 (adjusted annually by CPI-W). See the Asset Resource Sheet for the list of all excluded amounts.

Calculation of Income — 24 CFR 5.609(c): For initial occupancy/assistance and interim reexaminations, the PHA must estimate the family income for the upcoming 12-month period using current income. For all annual reexaminations, the PHA must determine the family income for the previous 12-months unless using a streamlined income determination, taking into account any redetermination from an interim reexamination and any unaccounted for income changes.

Interim Income Reexaminations — 24 CFR 960.257(b), 982.516(c), and 882.515(b): A family may request an interim reexamination because of family income or composition changes since the last examination. An interim reexamination should be conducted when a family's adjusted income decreases by 10% or more (or lower threshold per HUD or PHA policy). An interim reexamination should also be conducted when a family's adjusted income increases by 10% or more; however, the PHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the certification period. See the Interim Reexaminations Fact Sheet.



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#### HOTMA Sections 102 and 104: Income and Assets Fact Sheet

Safe Harbor: Income Determinations from Other Programs — 24 CFR 5.609(c)(3): The PHA may determine a family's pre-deduction income based on income determinations made by other means-tested federal public assistance programs within the previous 12-months. PHAs are not required to use this method.

**Eliminates the Earned Income Disregard:** Only families already participating in EID on the effective date of the final rule may continue receiving the benefits up to 2 years from that date. Families receiving the Jobs Plus Earned Income Disregard pursuant to the FY2022 NOFO or earlier may continue to receive the EID under the terms of the NOFO.

Mandatory Deductions — 24 CFR 5.611 (a)(1)-(a)(2): Changes the mandatory deduction amounts to \$480 per dependent and \$525 per elderly and disabled family. These amounts are 2024 figures, adjusted annually for inflation and rounded to the next lowest multiple of \$25.

Health and Medical Expense Deduction — 24 CFR 5.611(a)(3): Increases the threshold for the deduction of unreimbursed health and medical care expenses plus unreimbursed reasonable attendant care and auxiliary apparatus expenses that enable employment to 10% of annual income.

Permissive Deductions — 24 CFR 5.611(b): A PHA may adopt, through written policies, additional deductions from annual income. PHAs will not be eligible for additional HUD funding based on application of these deductions.

## Hardship Exemptions to the Health and Medical Expenses Deduction — 24 CFR 5.611(c)(1)-(c)(2):

There are two categories of hardship exemptions to the new 10% threshold for unreimbursed health and medical expenses: a phase-in for families already receiving a deduction for expenses over 3% of their income and a general hardship exemption.

**Exemption to Continue the Child Care Expense Deduction — 24 CFR 5.611(d):** A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue the deduction.

**Limitation on Assets — 25 CFR 5.618(a):** The new rule restricts families from receiving public housing or Section 8 benefits if their net family assets exceed \$100,000 (as adjusted annually) or if the family owns real property deemed suitable for the family to live in.

Exclusion from Assets — 24 CFR 5.603(b)(3): There are new exclusions from assets, including related to necessary items of personal property, non-necessary items of personal property when the total value does not exceed \$50,000 (as adjusted), and real property that the family does not have the legal authority to sell.

See the <u>Assets, Asset Exclusions</u>, and <u>Limitation on Assets Resource Sheet</u> for a complete list and more information on exclusions and real property.

#### Additional Resources on HOTMA Sections 102/104

HUD Exchange: HOTMA Income and Assets Training Series



## Section 103: Over-Income Limits for Public Housing Families Fact Sheet

Section 103 creates new limitations on program participation for families residing in public housing that remain over-income (OI) for 24 consecutive months. After a 24 month grace period, PHA policy may allow OI families to continue to live in a public housing unit paying an alternative rent. If the PHA does not adopt such a policy, the PHA must terminate tenancy of the OI family within six months of the final notification.

The new rules are implemented through two new sections in the public housing regulations: 24 CFR 960.507 Families exceeding the income limit, and 24 CFR 960.509 Lease requirements for non-public housing over-income families. Related definitions can be found in 24 CFR 960.102(b).

**The provisions implementing section 103 will be effective March 16, 2023.** All PHAs must fully implement OI policies no later than June 14, 2023. There are **no exceptions** to the income limitation on public housing program participation.

Over-income (OI) limit: set by multiplying the very low-income level for the applicable area by a factor of 2.4, a limit equal to approximately 120% of the AMI. OI procedures are triggered by **annual or interim reexaminations**. During the reexamination, if the family is determined to be OI, the OI notification process begins.

Over-income (OI) family: families whose income exceeds the OI limit, including families during the grace period or before program termination or execution of a non-public housing over-income lease. These families retain all of their rights and obligations as public housing program participants.

**Non-public housing over-income (NPHOI) family:** a family whose income exceeds the OI limit for 24 consecutive months and remains in the unit paying the alternative non-public housing rent.

These families must have signed an NPHOI lease and are no longer public housing program participants. NPHOI families may not participate in public housing resident councils or programs for low-income or public housing participants. NPHOI families cannot receive a utility allowance from the PHA, be subject to income reexaminations, or be required to comply with Community Service and Self-Sufficiency Requirements.

Alternative Non-Public Housing Rent: A remaining NPHOI family must be charged a monthly rent equal to the higher of: the applicable fair market rent (24 CFR 888(A)), or the amount of the monthly subsidy provided for the unit (HUD will publish annually).



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## Section 103: Over-Income Limits for Public Housing Families Fact Sheet

Falling below OI limit: If the PHA determines (in an interim or regular reexamination) that a family's income has fallen below the OI limit at any time during the 24-month grace period the family will remain public housing program participants and return to regular income reexamination periods. If the family becomes OI again, the PHA begins a new 24-month grace period.

**Notices:** PHAs must give OI families 3 notices, each within 30 days of the income examination that determines the family is, or remains, OI: at the initial determination of OI status, following the reexamination at the conclusion of the 1st 12 months of the grace period, and at the conclusion of the 24 month grace period.

All notices must be provided in writing and state what actions will be taken as required under the PHA's OI policy in the Admissions and Continued Occupancy Policy (ACOP). If applicable, the notice must include the alternative rent amount. All notices must provide information on the family's right to a grievance hearing.

Policies: PHAs must have a continued occupancy policy detailed in its ACOP to either:

- Require OI families to execute a new NPHOI lease within 60 days of notification and charge the family the alternative non-public housing rent, or
- Terminate the tenancy of the family no more than 6 months after the notification.

PHAs may choose to adopt a waitlist preference for NPHOI families who again become income-eligible for readmission to the public housing program. These families would then reapply. OI families who have vacated public housing are not eligible for this preference.

Reporting: The PHA must submit a report annually that specifies:

- The number of OI families residing in a PHA's public housing as of the end of the calendar year. This report will be pulled by HUD via the form HUD-50058.
- The number of families on the waiting lists for admission to public housing. This information will be submitted through the Operating Fund Web Portal beginning January 1, 2024.

#### **Related Resources:**

- Supplemental Guidance for Implementation of Section 103; Limitation on Public Housing Tenancy for Over-Income Families under the Housing Opportunity Through Modernization Act of 2016 (HOTMA)
  - » See Appendix for directions on calculating the OI limit.
- Implementation of Section 103: Over-Income Limits for Public Housing Families recorded training, presentation, and transcript
- Sample NPHOI lease
- Sample OI Notices



HOTMA mandates the exclusion of earned income for full-time dependent students and the exclusion of certain financial aid for both full and part-time students.

## Mandatory Deduction for Full-time Students 24 CFR 5.609(b)(14)

The earned income of dependent full-time students in excess of the amount of the deduction for a dependent is excluded from income. Since there is a mandatory \$480 deduction\* for dependents, the result is that all earned income of dependent students will either be excluded or deducted from income. (\*The deduction amount will be adjusted annually for inflation and rounded to the next lowest multiple of \$25.)

## Educational Savings Account 24 CFR 5.609(b)(10)

Any amount in or from, or any benefits, income, or distributions from, any Coverdell educational savings account of or any qualified tuition program under IRS sections 529 and 530 shall be excluded from income.

## Student Financial Assistance 24 CFR 5.609(b)(9)

The new rules create two categories of student financial aid. The first category, is any assistance that section 479B of the Higher Education Act of 1965, as amended, requires to be excluded from a family's income, referred to here as, "Title IV HEA Assistance." For public housing residents, all assistance in this category must be excluded from income. See the exception for some Housing Choice Voucher participants below in the final section.

The second category is any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education.

Exclusion in both categories apply equally to full and part-time students.

#### Title IV HEA Assistance 24 CFR 5.609(b)(9)(i)

**Title IV HEA Assistance refers to** any assistance that section 479B of the Higher Education Act of 1965, as amended (20 U.S.C. 1087uu), requires to be excluded from a family's income. This includes:

- Bureau of Indian Affairs/ Education student assistance programs. Current examples include:
  - » The Higher Education Tribal Grant, and
  - » The Tribally Controlled Colleges or Universities Grant Program.



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- Student assistance received under Title IV of HEA currently includes, but is not limited to:
  - » Federal Pell Grants
  - » Teach Grants
  - » Federal Work-Study Programs
  - » Federal Perkins Loans

**Beginning January 1, 2024,** PHAs shall exclude from income amounts received for the forms of assistance listed in the revised version of Section 479B of the HEA. This will expand the forms of excluded income to include:

 Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA), including: workforce investment activities for adults and workers dislocated as a result of permanent closure or mass layoff at a plant, facility, or enterprise, or a natural or other disaster that results in mass job dislocation, in order to assist such adults or workers in obtaining reemployment as soon as possible.

Section 479B of the HEA requires that all assistance under Title IV of the HEA as well as Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, be excluded from HUD income calculations. (See the exception for some Housing Choice Voucher participants below.)

## Other Student Financial Assistance 24 CFR 5.609(b)(9)(ii)

This category of excluded student financial assistance recognizes that student aid can take a variety of forms and come from a variety of sources.

It seeks to cover student financial assistance, for both full and part-time students, that is **not** included under Title IV of the HEA or under Bureau of Indian Affairs student assistance programs.

To qualify as excluded student financial assistance under this category, the aid must be:

- · Used for "actual covered costs"
- · Expressly to assist the a student with the costs of higher education; or
- Expressly to assist a student who is not the head of household or spouse, with the reasonable and actual
  costs of housing while attending the institution of higher education and not residing in an assisted unit;
- · A grant or scholarship received from:
  - » The federal government;
  - » A State, Tribe, or local government;
  - » A private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3);



Work Study: Amounts received under work study may only be excluded if provided pursuant to Title IV of the HEA or deducted as earned income if performed by a dependent full-time student (24 CFR 5.609(9)(ii)(B)(2)).

Loans: Loan proceeds for educational expenses, though considered student financial assistance if provided under a loan program in Title IV of the HEA, are not considered student financial assistance in the second category (Student Financial Assistance) but are already excluded from income as a loan (24 CFR 5.609(b)(20)).

- » A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- » An institution of higher education.

The aid may be paid directly to the student or to the educational institution on the student's behalf. However, any student financial assistance paid to the student must be verified by the PHA as consistent with this section (24 CFR 5.609 (b)(9)(ii)).

Student financial assistance, excluded here, does **not** include:

- Any assistance that is already excluded under Title IV of the HEA
- Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded as Title IV HEA Assistance).
- · Gifts, including gifts from family or friends; or
- Any amount of the scholarship or grant that, either by itself or in combination with HEA assistance exceeds the actual covered costs of the student.



Employer Grants: A grant includes a qualified tuition remission, reduction, waiver, or reimbursement (i.e., for costs of tuition, books, and fees, etc. paid for by the student) by the educational institution, such as for an employee of the institution of higher education or an eligible family member of that employee. A grant would also include assistance provided by an employer as part of an employee educational assistance program or tuition reimbursement program.



Actual covered costs of the student are the actual costs of: tuition, books and supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, or other fees required and charged to a student by for a student who is not the head of household or spouse, the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit. The educational institution must meet the definition of an (as defined under section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002))

## Calculating Exclusions from Both Categories

When the student is receiving assistance that is excluded under both categories, the Title IV HEA Assistance must be applied first. Student Financial Assistance can then be applied to any remaining actual covered costs. Once actual costs are covered, any remaining Student Financial Assistance would be considered income.

#### Steps:

- 1. Calculate the "actual covered costs."
- 2. Apply the Title IV HEA Assistance.
- 3. Subtract the actual covered costs from the total amount of Title IV HEA Assistance.
  - **a.** If the amount of assistance excluded as Title IV HEA Assistance is equal to or exceeds the actual covered costs, none of the assistance included under "Student Financial Assistance"

would be excluded from income. This is because this assistance would no longer be needed to cover actual costs and therefore would not meet the definition of Student Financial Assistance.

- b. If the amount of Title IV HEA Assistance is less than the actual covered costs, go to the next step.
- Exclude the amount of Student Financial Assistance up to the amount of the remaining actual covered costs (those not covered by Title IV HEA Assistance).

| Example 1                           |          |
|-------------------------------------|----------|
| Title IV HEA Assistance:            | \$26,000 |
| Other Student Financial Assistance: | \$5,000  |
| Actual covered costs:               | \$25,000 |
| Excluded income:                    | \$26,000 |

**Explanation:** All assistance under Title IV HEA Assistance must be excluded from income. This exclusion must be taken first. Student Financial Assistance could then cover any remaining actual covered costs. However, since there were no remaining actual covered costs, this assistance would be counted as income.

| Example 2                           |          |
|-------------------------------------|----------|
| Title IV HEA Assistance:            | \$15,000 |
| Other Student Financial Assistance: | \$5,000  |
| Actual covered costs:               | \$22,000 |
| Excluded income:                    | \$20,000 |

**Explanation:** All financial assistance (\$20,000) is still less than the student's actual covered costs (\$22,000). Therefore, all financial assistance should be applied.

| Example 3                     |          |
|-------------------------------|----------|
| Title IV HEA Assistance:      | \$15,000 |
| Student Financial Assistance: | \$5,000  |
| Actual covered costs:         | \$18,000 |
| Excluded income:              | \$20,000 |

**Explanation:** In this case, the student's actual covered costs are only \$18,000. The amount of the scholarship that is considered Student Financial Assistance and excluded from income would be \$3,000. This is because

\$3,000 is the amount by which actual covered costs exceed the assistance excluded as Title IV HEA assistance (\$18,000 - \$15,000). The amount of the scholarship that is in excess of the student's actual covered costs (\$2,000) is not student financial assistance and is not excluded under § 5.609(b)(9)(ii).

Another way to explain this is that, Student Financial Assistance (§ 5.609(b)(9)(ii)) excluded from income is the lower of either:

- 1. the total amount of scholarships and grants the student received that are not covered by 479B of the of the HEA or
- 2. the amount by which the student's actual covered costs exceeds the assistance the student received that is excluded under section 479B of the HEA.

## **HCV Limitation for Student Assistance in Excess of Covered Costs**

Section 479B of the HEA requires that all assistance under Title IV of the HEA and Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, be excluded from HUD income calculations. However, for over 10 years through FY 2022, HUD appropriations have included a provision that for Section 8 students who are age 23 and under or without dependent children any amounts received in excess of tuition and any other required fees and charges shall be considered income. This limitation has been interpreted to apply when the student is the head of household or spouse, but not when the student resides with parents in a Section 8 unit (71 FR 18146). For any funds from a year where HUD's appropriations acts include this limitation, it will apply with respect to Section 8 participants. HUD will notify PHAs if this requirement is removed from the appropriations act.

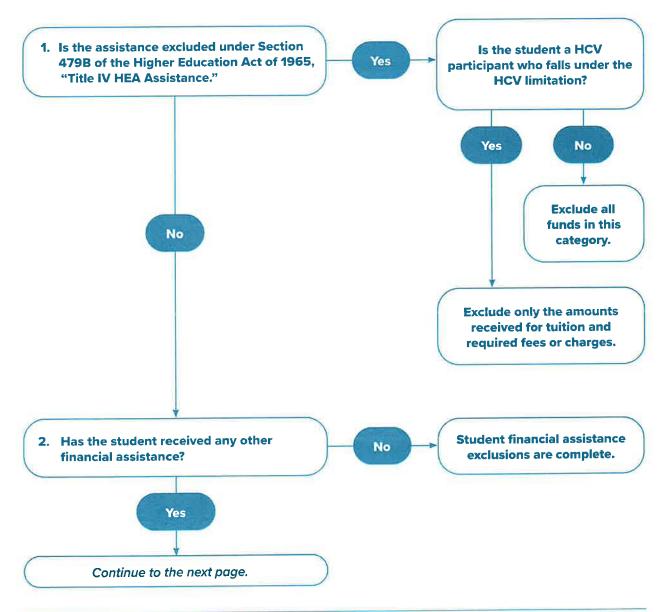
## Student Financial Assistance Exclusion Decision Tree

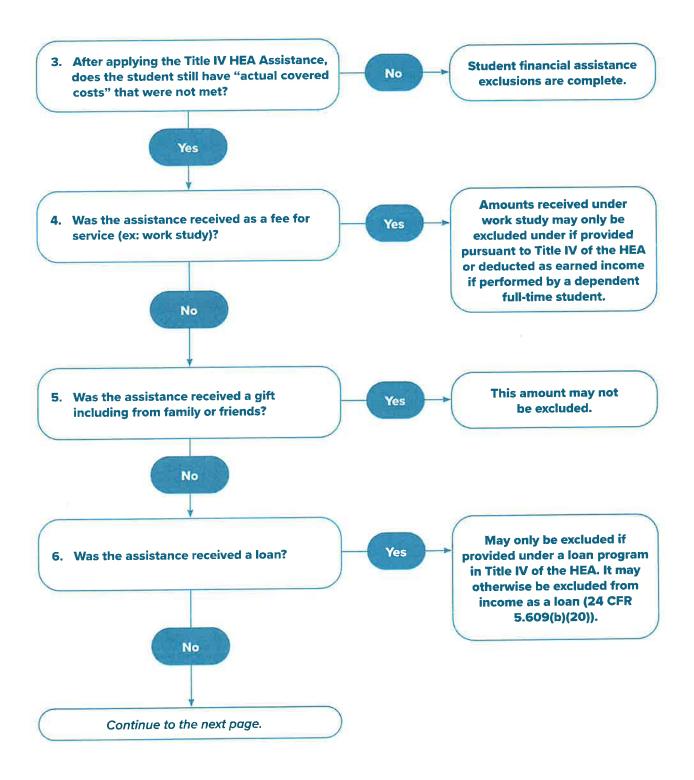
Before going through the decision tree, determine:

Title IV HEA Assistance:

Other Student Financial Assistance:

Actual covered costs:





Yes

## 7. Does the aid meet the following requirements:

- Expressly to assist a student with the costs of higher education; or
- Expressly to assist a student who is not the head of household or spouse, with the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit;
- A grant or scholarship received from:
  - » The federal government; a State, Tribe, or local government; a private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3); a business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or an institution of higher education.

Exclude the amount of Other Student Financial Assistance up to the amount of the remaining actual covered costs (those not covered by Title IV HEA Assistance). After making this exclusion, any remaining funds are considered income.



Student financial assistance exclusions are complete.



Health and Medical Expenses & Child Care Expenses

# Hardship Exemptions Resource Sheet

This resource is meant for both PHAs and families participating in public housing and the Housing Choice Voucher program (Section 8).

## Health and Medical Expense Deduction

New HUD rules allow health and medical expenses exceeding 10% of a family's annual income to be deducted from the amount of a family's income to determine the **adjusted** income which is then used to calculate the rent.

Qualifying expenses are the sum of:

- · Unreimbursed health and medical care expenses of any elderly or disabled family; and
- Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with a disability, in order to enable any member of the family, including the person with a disability, to be employed.
  - » This deduction may not exceed the combined earned income of the adult family members who are able to work due to the attendant care or auxiliary apparatus.

Note: The full text of the rule can be found in the Code of Federal Regulations in section 24 CFR 5.611(a)(3).

## **Estimating Qualifying Expenses**

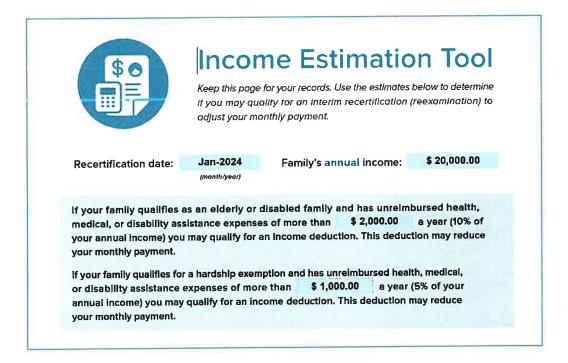
HUD has an **Income Estimation Tool** which may be used by the public housing agency (PHA) and families to estimate at what amount of expenses a family would begin to receive a deduction for health and medical expenses.

In the following example, the family earns \$20,000 per year. The tool shows that qualified expenses over \$2000, which is 10% of the family's income, could be deducted in determining the family's adjusted income.



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## Hardship Exemptions Resource Sheet



## Hardship Exemptions to the Health and Medical Expenses Deduction

HUD has also created two categories of hardship exemptions to the new 10% threshold for unreimbursed medical expenses. The exemptions allow for more expenses to be deducted from the family's adjusted income for a limited period of time.

## Category 1: Phased In relief for families already receiving a health and medical deduction

The new rule increases the health and medical expense deduction to the amount by which those expenses exceed 10% of the family's annual income. This is an increase from the previous threshold of 3%. Families previously receiving the deduction may see an increase in their non-deductible health and medical expenses, which could result in an increase in their adjusted income and their rent. However, this may be offset by the increased deduction for elderly and disabled families from \$400 to \$525. This hardship exemption phases in the new deduction amount over two years.

**Eligibility:** As of January 1, 2024, the family must have been receiving a deduction from annual income of qualified health and medical expenses exceeding 3 percent of annual income.

Form and duration of the exemption: Those families experiencing a hardship will have a phase in to the new deduction amount over two years:

- 1st year: PHA deducts eligible expenses exceeding 5% of the family's income.
- 2nd year: PHA deducts eligible expenses exceeding 7.5% of the family's income.

## Hardship Exemptions Resource Sheet

 After 24 months this hardship exemption expires. The PHA will deduct expenses exceeding 10% of the family's annual income, unless the family requests and qualifies for a new exemption under category 2.

#### **Category 2: General Financial Hardships**

This exemption is for families who can demonstrate a financial hardship due to an increase in their qualified expenses or because of a change that would not otherwise trigger an interim reexamination. For example, a decrease in income or a change in family composition.

**Eligibility:** A family must demonstrate that their applicable expenses increased or the hardship is a result of a change in circumstances, as defined by the PHA, that would not otherwise trigger an interim reexamination.

This relief is available regardless of whether the family previously received health and medical deductions or is currently receiving, or previously received, a hardship exemption under the first category.

#### Form and duration:

- The family may receive a deduction of all eligible expenses exceeding 5% of their annual income.
- The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier.
- The PHA may, at their discretion, extend the relief for one or more additional 90-day periods while the family's hardship continues.

## Category 2 may also include families that qualified under Category 1 but:

- · Exhausted that relief (after 24 months), or
- Chose to apply for relief under this category in the 2nd year of receiving a Category 1 deduction.
   The family would then receive a deduction for their qualifying expenses over 5% of their income instead of those exceeding 7.5% of their income.
- The family will no longer be eligible for a hardship exemption under the first category, even if they had not finished the 24 month period.

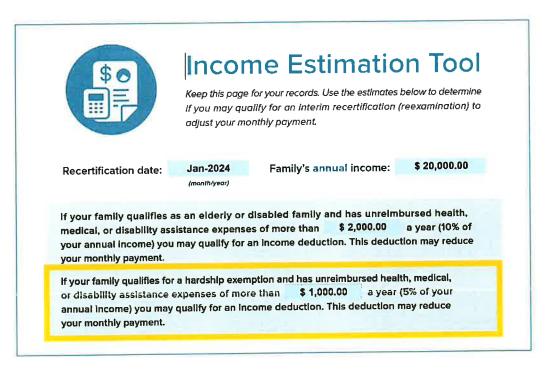
**Note:** The full text of the rule related to these hardship exemptions can be found in the Code of Federal Regulations in section 24 CFR 5.611(c).

#### Estimating if a family qualifies for a hardship exemption

The **Income Estimation Tool** can also be used to see if a family may be eligible for a hardship deduction. The tool shows the amount of qualified expenses over 5% of the family's income. If the family has a financial hardship making it unable for them to pay the rent and has qualified health and medical expenses over 5% they should speak to the PHA to see if they qualify for a hardship exemption.

# Hardship Exemptions Resource Sheet

In this same example, the tool shows that the family would have to have qualified expenses over \$1000, which is 5% of the family's income, to potentially qualify for a hardship exemption.



# **Child Care Expense Deduction**

Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education may be deducted from income.

This means that the amount of child care expenses may be deducted from the family's annual income in determining their adjusted annual income and therefore their rent. The expenses that can be deducted cannot exceed the amount of income earned by the person who is able to work due to the childcare.

For example, if childcare costs are \$6000 for the year and the parent who is able to work due to childcare earns \$5000 annually, then \$5000 would be deducted in determining the family's adjusted income.

Note: The full text of the rule can be found in the Code of Federal Regulations in section 24 CFR 5.611(a)(4).

## Hardship Exemptions Resource Sheet

### **Exemption to Continue the Child Care Expense Deduction**

A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue the deduction.

**Eligibility:** The family must demonstrate that they are unable to pay their rent because of loss of this deduction, and the child care expense is still necessary even though the family member is no longer employed or furthering education.

For example, the parent who was working due to the child care had to leave their job to care for a sick family member. In order to provide this unpaid care they continue to need childcare.

#### Form and duration of relief:

- · Up to 90 days.
- The exemption may be extended, at the PHA's discretion, for additional 90-day periods based on family circumstances.
- The PHA may terminate the hardship exemption if they determine that the family no longer needs it.

**PHA Policy:** The PHA must have an established policy for determining a family's inability to pay the rent if they request a child care hardship exemption.

**Family notification:** The family must receive prompt notification in writing of the change in adjusted income and the rent due to the child care hardship exemption, and dates for when the hardship exemption will begin and expire.

Note: The full text of the rule related to these hardship exemptions can be found in the Code of Federal Regulations in section 24 CFR 5.611(d).

#### Related Resources

- Income Estimation Tool and Directions
- HOTMA Income and Assets Trainings Series

# Attachment #2 – Capital Fund – Five Year Action Plan

Status: Approved Approval Date: 08/29/2023 Approved By: VADLAMURU, KOMALATHA 02/28/2022

| Status: | Approved Approval Date: 08/29/2023              |  | Approved by: VADLE                | VADLAMORU, NOMALATHA              | A                                 |                                   |
|---------|---|--|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|
| Part    | Part I: Summary                                 |  |                                   |                                   |                                   |                                   |
| РНА     | PHA Name: Housing Authority of the City of York | Locality (City/County & State)  X Original 5-Year Plan | unty & State)<br>ar Plan          | Revised 5-Year Plan (Revision No: | an (Revision No:                  | )                                 |
| РНА     | PHA Number: PA022                               |  |                                   |                                   |                                   |                                   |
| A.      | Development Number and Name                     | Work Statement for<br>Year 1 2023                      | Work Statement for<br>Year 2 2024 | Work Statement for<br>Year 3 2025 | Work Statement for<br>Year 4 2026 | Work Statement for<br>Year 5 2027 |
|         | FAIRMONT (PA022000006)                          | \$346,600.00   | \$150,000.00                      | \$550,000.00                      |                                   |                                   |
|         | SPRINGFIELD (PA022000007)                       | \$410,000.00   | \$190,000.00                      |                                   | \$40,000.00                       | \$110,000.00                      |
|         | BROAD PARK MANOR (PA022000004)                  | \$318,377.25   | \$879,563.00                      | \$1,725,000.00                    | \$5,385,000.00                    | \$2,800,000.00                    |
|         | WELLINGTON HOMES (PA022000002)                  | \$10,000.00  | \$40,000.00                       | \$25,000.00                       |                                   | \$156,600.00                      |
|         | AUTHORITY-WIDE                                  | \$1,545,334.75   | \$940,000.00                      | \$1,080,000.00                    | \$1,155,000.00                    | \$1,155,000.00                    |
|         | PARKWAY HOMES (PA022000003)                     | \$50,000.00  |                                   |                                   | \$862,000.00                      | \$3,332,600.00                    |
|         | SCATTER SITE (PA022000005)                      |  | \$307,000.00                      | \$250,000.00                      |                                   | \$30,500.00                       |
|         | STONY BROOK MANOR (PA022000008)                 |  |                                   | \$115,000.00                      | \$855,000.00                      | \$1,025,000.00                    |
|         | EASTWOOD TERRACE (PA022000009)                  |  |                                   |                                   |                                   | \$1,175,000.00                    |

|                           |  |  |  |  |   |                        |  |                                | _  |
|---------------------------|--|--|--|--|---|------------------------|--|--------------------------------|--|
|                           | ID0427   | ID0414   | ID0286   | ID0247   | ID0108  |                        | Identifier                                   | Work Staten                    | Part II: Sup   |
| SPRINGFIELD (PA022000007) | Replace water heater(Dwelling Unit-Interior (1480)-Plumbing) | Improve Dumpster Area(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving) | ADA Accommodations (Contract Administration (1480)-Contingency)  | Install Fencing - Fielding Way(Dwelling Unit-Site Work (1480)-Fencing) | Replace Lobby A/C units(Non-Dwelling Interior (1480)-Other) | FAIRMONT (PA022000006) | Development Number/Name                      | Work Statement for Year 1 2023 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                           | replace one water heater                                     | Additional concrete pad for dumpster access                                      | ADA improvements interior of unit (Note: Per physical needs assessment no exterior work needed at this time) | Install fencing around playground & retention pond                     | Replace 4 existing A/C units                                |                        | General Description of Major Work Categories |                                |  |
|                           |  |  |  |  |   |                        | Quantity                                     |                                |  |
| \$410,000.00              | \$40,000.00  | \$250,000.00   | \$10,000.00  | \$6,600.00   | \$40,000.00   | \$346,600.00           | Estimated Cost                               |                                |  |

| ID0419   | ID0295   | ID0281  | ID0279  |                                | ID0288   | ID0116   | Identifier                                   | Work State                     | Part II: Sup   |
|--|--|---|---|--------------------------------|--|--|--|--------------------------------|--|
| Replace Roofs Smyser & North St(Dwelling Unit-Exterior (1480)-Roofs) | ADA Accommodations (Contract Administration (1480)-Contingency)  | Asbestos Flooring Abatement(Dwelling Unit-Interior (1480)-Flooring (non routine)) | Sidewalk Repair(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving) | BROAD PARK MANOR (PA022000004) | ADA Accommodations (Contract Administration (1480)-Contingency)  | Replace Windows(Dwelling Unit-Exterior (1480)-Windows) | Development Number/Name                      | Work Statement for Year 1 2023 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Replace 4 duplex roofs at Smyser & North St                          | ADA improvements interior of unit (Note: Per physical needs assessment no exterior work needed at this time) | Abatement of asbestos flooring tile and mastic (10 units)                         | Repair sidewalks as needed (432 linear ft)                                  |                                | ADA improvements interior of unit (Note: Per physical needs assessment no exterior work needed at this time) | Replace 150 windows                                    | General Description of Major Work Categories |                                |  |
|  |  |   |   |                                |  |  | Quantity                                     |                                |  |
| \$80,000.00  | \$5,000.00   | \$153,377.25  | \$80,000.00   | \$318,377.25                   | \$10,000.00  | \$400,000.00   | Estimated Cost                               |                                |  |

| ID0303   | ID0302  | ID0301  | ID0300  |                         | ID0291   |                                | Identifier                                   | Work Stater                    | Part II: Sup   |
|--|---|---|---|-------------------------|--|--------------------------------|--|--------------------------------|--|
| Arch. / Eng. Costs(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs) | Operations(Operations (1406))                   | Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry) | Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | AUTHORITY-WIDE (NAWASD) | ADA Accommodations(Contract Administration (1480)-Contingency) | WELLINGTON HOMES (PA022000002) | Development Number/Name                      | Work Statement for Year 1 2023 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Arch. / Eng. Costs   | CFP funds to be used for PHA operating expenses | Admin Costs   | Management Improvements / Software Updates  |                         | ADA Accommodations as needed                                   |                                | General Description of Major Work Categories |                                |  |
|  |   |   |   |                         |  |                                | Quantity                                     |                                |  |
| \$100,000.00   | \$674,530.75                                    | \$260,000.00  | \$50,992.00   | \$1,545,334.75          | \$10,000.00  | \$10,000.00                    | Estimated Cost                               |                                |  |

|                            | ID0430  |                             | ID0318   | ID0316   | ID0314                                 | ID0304  | Identifier                                   | Work S                         | Part II:   |
|----------------------------|---|-----------------------------|--|--|--|---|--|--------------------------------|--|
| Subtotal of Estimated Cost |   | PARKWAY HOMES (PA022000003) | Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)                       | Admin Fee(Administration (1410)-Salaries, Administration (1410)-Other, Administration (1410)-Sundry) | Manage Improvements(Operations (1406)) | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) | fier Development Number/Name                 | Work Statement for Year 1 2023 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                            | 3 Jefferson Center - Common Area Improvements |                             | Equipment 7 pieces to include snow removal equipment, plows, drain snakes, skid steer w/ forks |  | Management Improvements                | Hardware / Equipment  | General Description of Major Work Categories |                                |  |
|                            |   |                             |  |  |  |   | Quantity                                     |                                |  |
| \$2,680,312.00             | \$50,000.00                                   | \$50,000.00                 | \$70,000.00  | \$269,812.00   | \$50,000.00                            | \$70,000.00   | Estimated Cost                               |                                |  |

| ID0121  |                           | ID0389   | ID0153   | ID0094   | ID0092   |                                | Identifier                                   | Work Staten               | Part II: Supp  |
|---|---------------------------|--|--|--|--|--------------------------------|--|---------------------------|--|
| Replace Window HVAC units(Dwelling Unit-Interior (1480)-Mechanical) | SPRINGFIELD (PA022000007) | Remove Decommissioned Boilers & piping(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) | Replace Main Sewer Lines(Dwelling Unit-Site Work (1480)-Sewer Lines - Mains) | Renovate Bathrooms - Cottages(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks) | Replace Stoves(Dwelling Unit-Interior (1480)-Appliances)     | BROAD PARK MANOR (PA022000004) | Development Number/Name                      | Work Statement for Year 2 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Replace 75 existing window HVAC units in building                   |                           | Replace decommissioned boilers and piping at 133 S. Broad, 440 E. king & 449 E. King   | Replace Main Sewer Lines in 3 buildings                                      | Renovate bathrooms in 16 units   | Replace existing stove with energy start models in 281 units |                                | General Description of Major Work Categories |                           |  |
|   |                           |  |  |  |  |                                | Quantity                                     |                           |  |
| \$150,000.00  | \$190,000.00              | \$150,000.00   | \$510,000.00   | \$120,000.00   | \$99,563.00  | \$879,563.00                   | Estimated Cost                               |                           |  |

|   |   |   |                         |   |  |                           | _  |            |
|---|---|---|-------------------------|---|--|---------------------------|--|------------|
| ID0164  | ID0163  | ID0162  |                         | ID0201  | Identifier                                   | Work Staten               | Part II: Supp  |            |
| Operations(Operations (1406))                   | Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry) | Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) | AUTHORITY-WIDE (NAWASD) | Install Security Cameras(Dwelling Unit-Site Work (1480)-Other)                  | Development Number/Name                      | Work Statement for Year 2 | Part II: Supporting Pages - Physical Needs Work Statements (s) |            |
| CFP funds to be used for PHA operating expenses | Admin Costs   | Employee training / Software Upgrades   |                         | Install 2 Security Cameras/software in elevator lobbies on 4 floors (8 cameras) | General Description of Major Work Categories |                           |  |            |
|   |   |   |                         |   | Quantity                                     |                           |  |            |
| \$550,000.00                                    | \$220,000.00  | \$50,000.00   | \$940,000.00            | \$40,000.00   | Estimated Cost                               |                           |  | 02/28/2022 |

ID0166

Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)

Purchase of support hardware / equipment

\$70,000.00

\$50,000.00

ID0165

Arch. / Eng. Fees(Contract Administration (1480)-Other Fees and Costs)

Arch. / Eng. Fees

|                        | ID0308  |                                | ID0429  | Ш0428  | ID0193  |                            | Identifier                                   | Work States                    | Part II: Sup   |
|------------------------|---|--------------------------------|---|--|---|----------------------------|--|--------------------------------|--|
| FAIRMONT (PA022000006) | Install New Toilets(Dwelling Unit-Interior (1480)-Commodes) | WELLINGTON HOMES (PA022000002) | Seal cost and restripe Parking Lot - Fairmont Village(Dwelling Unit-Site Work (1480)-Seal Coat) | Replace Siding & Windows(Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Windows) | Install CO2 Detectors(Dwelling Unit-Interior (1480)-Other)  | SCATTER SITE (PA022000005) | Development Number/Name                      | Work Statement for Year 2 2024 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                        | Install new toilets in 72 units                             |                                | Seal cost and restripe Parking Lot at Fairmont Village  | Replace siding and windows at Fairmont Village - 15 units  | Install 37 CO2 Detectors  201-209 Mulberry St 213-215 Mulberry St 504-508 S Second St 1427 Salem Road Units A-E 1429 Salem Road Units A-E |                            | General Description of Major Work Categories |                                |  |
|                        |   |                                |   |  |   |                            | Quantity                                     |                                |  |
| \$150,000.00           | \$40,000.00   | \$40,000.00                    | \$20,000.00   | \$250,000.00   | \$37,000.00   | \$307,000.00               | Estimated Cost                               |                                |  |

|                            |  |  |                           |  | П |
|----------------------------|--|--|---------------------------|--|---|
|                            | ID0424   | Identifier                                   | Work Staten               | Part II: Supp  |   |
| Subtotal of Estimated Cost | Replace A/C Units(Dwelling Unit-Interior (1480)-Other) | Development Number/Name                      | Work Statement for Year 2 | Part II: Supporting Pages - Physical Needs Work Statements (s) |   |
|                            | Replace PTAC units in 100 units                        | General Description of Major Work Categories |                           |  |   |
|                            |  | Quantity                                     |                           |  |   |
| \$2,506,563.00             | \$150,000.00   | Estimated Cost                               |                           |  |   |

| ID0416  | ID0415   | ID0392   | ID0390  | ID0347  | ID0225  |                                | Identifier                                   | Work Stater                    | Part II: Sup   |
|---|--|--|---|---|---|--------------------------------|--|--------------------------------|--|
| Storm Sewer French Drain Replacement(Dwelling Unit-Site Work (1480)-Storm Drainage) | Replace entry doors(Non-Dwelling Exterior (1480)-Doors)  | Remove old plumbing - BPM(Non-Dwelling Construction - Mechanical (1480)-Other) | Replace rooftop A/C Units (Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems) | Asbestos Flooring Abatement - Common Areas(Non-Dwelling Interior (1480)-Common Area Flooring) | Asbestos Abatement - Popcom Ceilings(Dwelling Unit-Interior (1480)-Other) | BROAD PARK MANOR (PA022000004) | Development Number/Name                      | Work Statement for Year 3 2025 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Storm Sewer French Drain Replacement at 440 E, King St. & 31 S. Broad St.           | replace 2 entry doors at BPM (27 & 31 S. Broad St bldg.) | Remove old boilers & piping from old hvac systems in all 3 high rises          | Replace A/C units on 31. S. Broad St  | Abate asbestos tile and mastic from 12 common areas and hallways & install new flooring       | Abate asbestos popcom ceilings in 281 units                               |                                | General Description of Major Work Categories |                                |  |
|   |  |  |   |   |   |                                | Quantity                                     |                                |  |
| \$100,000.00  | \$10,000.00  | \$100,000.00   | \$115,000.00  | \$900,000.00  | \$500,000.00  | \$1,725,000.00                 | Estimated Cost                               |                                |  |

|                            | ID0412  | ID0368   |                                 | ID0411   | ID0356  |                        | Identifier                                   | Work State                     | Part II: Sup   |
|----------------------------|---|--|---------------------------------|--|---|------------------------|--|--------------------------------|--|
| SCATTER SITE (PA022000005) | Install Additional Security Cameras(Dwelling Unit-Site Work (1480)-Other) | Seal Brick Exterior(Non-Dwelling Exterior (1480)-Paint and Caulking) | STONY BROOK MANOR (PA022000008) | Install Security Cameras(Dwelling Unit-Site Work (1480)-Other) | Upgrade Elevators(Non-Dwelling Interior (1480)-Other) | FAIRMONT (PA022000006) | Development Number/Name                      | Work Statement for Year 3 2025 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                            | Install additional security cameras                                       | Seal Brick Exterior on 1 building                                    |                                 | Install interior/exterior security cameras                     | Upgrade 2 elevators                                   |                        | General Description of Major Work Categories |                                |  |
|                            |   | *(   |                                 |  |   |                        | Quantity                                     |                                |  |
| \$250,000.00               | \$25,000.00   | \$90,000.00  | \$115,000.00                    | \$50,000.00  | \$500,000.00  | \$550,000.00           | Estimated Cost                               |                                |  |

| ID0413                        | ID0400  | ID0399   | ID0398   | ID0397  |                         | ID0387  | Identifier                                   | Work Staten                    | Part II: Sup   |  |
|-------------------------------|---|--|--|---|-------------------------|---|--|--------------------------------|--|--|
| Operations(Operations (1406)) | hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) | Arch / Engineering Costs(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs) | Administration (Administration (1410)-Other, Administration (1410)-Salaries) | Management Improvements(Management Improvement (1408)-Staff Training) | AUTHORITY-WIDE (NAWASD) | Roof Replacement(Dwelling Unit-Exterior (1480)-Roofs)                     | Development Number/Name                      | Work Statement for Year 3 2025 | Part II: Supporting Pages - Physical Needs Work Statements (s) |  |
| Operational support           | hardware and equipment  | A/E Costs  | ADmin  | Management improvements`  |                         | Replace roof at 19 W. Pennsylvania Ave Yoe (1 3 story building - 6 units) | General Description of Major Work Categories |                                |  |  |
|                               |   |  |  |   |                         |   | Quantity                                     |                                |  |  |
| \$660,000.00                  | \$70,000.00   | \$50,000.00  | \$250,000.00   | \$50,000.00   | \$1,080,000.00          | \$250,000.00  | Estimated Cost                               |                                |  |  |

|                            | ID0408  |                                | Identifier                                   | Work State                | Part II: Su  |
|----------------------------|---|--------------------------------|--|---------------------------|--|
| Subtotal of Estimated Cost | Replace Emergency Generator at Wellington Center(Non-Dwelling Construction - Mechanical (1480)-Generator) | WELLINGTON HOMES (PA022000002) | Development Number/Name                      | Work Statement for Year 3 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                            | Replace Emergency Generator at Wellington Center  |                                | General Description of Major Work Categories |                           |  |
|                            |   |                                | Quantity                                     |                           |  |
| \$3,745,000.00             | \$25,000.00   | \$25,000.00                    | Estimated Cost                               |                           |  |

|   |   |                                |   |   |  |                             |  |                                |  | 1 |
|---|---|--------------------------------|---|---|--|-----------------------------|--|--------------------------------|--|---|
| ID0417  | ID0322  |                                | ID0339  | ID0275  | ID0219   |                             | Identifier                                   | Work Staten                    | Part II: Supp  |   |
| Diakin - HVAC Upgrade(Dwelling Unit-Site Work (1480)-Other) | Remodel Bathrooms(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical)) | BROAD PARK MANOR (PA022000004) | Asbestos Abatement - Pipe Insulation(Dwelling Unit-Interior (1480)-Other) | Replace Underground Gas Lines(Dwelling Unit-Site Work (1480)-Other)                           | Replace Roofs - Parkway & Parkway Ext(Dwelling Unit-Exterior (1480)-Roofs) | PARKWAY HOMES (PA022000003) | Development Number/Name                      | Work Statement for Year 4 2026 | Part II: Supporting Pages - Physical Needs Work Statements (s) |   |
| Replace Diakin system in 440 Bldg - 27 units                | Remodel 188 bathrooms   |                                | Remove asbestos pipe insulation from bulkheads in 188 units               | Replace Underground Gas Lines - exact liner feet to be replaced to be determined by engineer. | Replace roofs on 15 duplexes/rows  |                             | General Description of Major Work Categories |                                |  |   |
|   |   |                                |   |   |  |                             | Quantity                                     |                                |  |   |
| \$2,500,000.00  | \$120,000.00  | \$5,385,000.00                 | \$175,000.00  | \$200,000.00  | \$487,000.00   | \$862,000.00                | Estimated Cost                               |                                |  |   |

| ID0422   | ID0330   |                                 | ID0425   | ID0421  | ID0420  | ID0418  | Identifier                                   | Work Statement for Year | Part II: Supp  |
|--|--|---------------------------------|--|---|---|---|--|-------------------------|--|
| Upgrade Elevators(Dwelling Unit-Interior (1480)-Other) | Replace Gate Valves (Dwelling Unit-Interior (1480)-Plumbing) | STONY BROOK MANOR (PA022000008) | Replace Water Heater(Dwelling Unit-Interior (1480)-Plumbing) | Replace rooftop A/C units(Non-Dwelling Interior (1480)-Other) | Replace Boilers & Pumps(Non-Dwelling Interior (1480)-Mechanical)  | Diakin - HVAC Upgrade(Dwelling Unit-Site Work (1480)-Other) | Development Number/Name                      | ent for Year 4 2026     | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Upgrade two elevators                                  | Replace gate valves in 100 units                             |                                 | Replace one water heater                                     | Replace rooftop A/C units at 27 S. Broad & 31 S. Broad        | Replace boilers and associated pumps at 27 S. Broad & 31 S. Broad | Replace Diakin system in 449 Bldg - 27 systems              | General Description of Major Work Categories |                         |  |
|  |  |                                 |  |   |   |   | Quantity                                     |                         |  |
| \$500,000.00   | \$30,000.00  | \$855,000.00                    | \$40,000.00  | \$75,000.00   | \$150,000.00  | \$2,500,000.00  | Estimated Cost                               |                         |  |

| ID0442   | ID0441  | ID0439                        |                         | ID0426   |                           | ID0423   | Identifier                                   | Work States                    | Part II: Sup   |
|--|---|-------------------------------|-------------------------|--|---------------------------|--|--|--------------------------------|--|
| Architects / Engineering(Contract Administration (1480)-Other) | Administration (Administration (1410)-Salaries) | Operations(Operations (1406)) | AUTHORITY-WIDE (NAWASD) | Replace Water Heater(Dwelling Unit-Interior (1480)-Plumbing) | SPRINGFIELD (PA022000007) | Install new shower surrounds(Dwelling Unit-Interior (1480)-Tubs and Showers) | Development Number/Name                      | Work Statement for Year 4 2026 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| A/E costs  | Administration                                  | Operations                    |                         | Replace one water heater                                     |                           | Install new shower surrounds in 100 units                                    | General Description of Major Work Categories |                                |  |
|  |   |                               |                         |  |                           |  | Quantity                                     |                                |  |
| \$100,000.00   | \$260,000.00                                    | \$675,000.00                  | \$1,155,000.00          | \$40,000.00  | \$40,000.00               | \$325,000.00   | Estimated Cost                               |                                |  |

|                            | ID0444  | ID0443  | Identifier                                   | Work State                     | Part II: Sup   |
|----------------------------|---|---|--|--------------------------------|--|
| Subtotal of Estimated Cost | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) | Management improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training) | Development Number/Name                      | Work Statement for Year 4 2026 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                            | Hardware / Equipment  | training for staff  | General Description of Major Work Categories |                                |  |
|                            |   |   | Quantity                                     |                                |  |
| \$8,297,000.00             | \$70,000.00   | \$50,000.00   | Estimated Cost                               |                                |  |

| ID0080  | ID0079   | ID0077  |                             | ID0431  | ID0071  |                                | Identifier                                   | Work States                    | Part II: Sup   |
|---|--|---|-----------------------------|---|---|--------------------------------|--|--------------------------------|--|
| Upgrade Electrical Service / Install New Smoke/CO2 Det.(Dwelling Unit-Interior (1480)-Electrical) | Install New Radiators in Bathrooms(Dwelling Unit-Interior (1480)-Mechanical) | Remodel bathrooms(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Tubs and Showers) | PARKWAY HOMES (PA022000003) | Utility Pole Repairs - Wellington(Non-Dwelling Site Work (1480)-Site Utilities) | Remodel Community Center(Non-Dwelling Interior (1480)-Community Building,Non-Dwelling Interior (1480)-Appliances) | WELLINGTON HOMES (PA022000002) | Development Number/Name                      | Work Statement for Year 5 2027 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Upgrade electrical service to 150 amp & install new smoke/CO2 detectors in 170 units              | Install new radiators in bathroom in 170 units                               | remodel bathrooms in 45 units   |                             | Repair YHA owned utility poles - 2 poles  | Remodel Community Center to include HVAC energy improvements, removal of old radiators                            |                                | General Description of Major Work Categories |                                |  |
|   | 1  |   |                             |   |   |                                | Quantity                                     |                                |  |
| \$241,000.00  | \$55,000.00  | \$500,000.00  | \$3,332,600.00              | \$6,600.00  | \$150,000.00  | \$156,600.00                   | Estimated Cost                               |                                |  |

| ID0342  | ID0310  | ID0283   | ID0179  | ID0150  | ID0083   | ID0082   | Identifier                                   | Work State                     | Part II: Sup   |
|---|---|--|---|---|--|--|--|--------------------------------|--|
| Install New Fencing - Parkway Extended(Non-Dwelling Site Work (1480)-Fencing) | Remodel Bathrooms(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical)) | ADA Accommodations (Contract Administration (1480)-Contingency)  | Window Replacement(Dwelling Unit-Exterior (1480)-Windows) | Replace Main Sewer Line(Dwelling Unit-Site Work (1480)-Sewer Lines - Mains) | Repair / Replace Windows - Parkway Extended(Dwelling Unit-Exterior (1480)-Windows) | Replace / Install Security Cameras (Dwelling Unit-Site Work (1480)-Other)                | Development Number/Name                      | Work Statement for Year 5 2027 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Install new fencing in Parkway Extended (5,280 linear ft.)                    | Remodel Bathrooms in 120 units  | ADA improvements interior of unit (Note: Per physical needs assessment no exterior work needed at this time) | Replace windows in 188 units                              | Replace Main Sewer Line   | Repair or replace windows as needed in 10 units                                    | Replace current security cameras and install additional cameras (40+ cameras & software) | General Description of Major Work Categories |                                |  |
|   |   |  |   |   |  |  | Quantity                                     |                                |  |
| \$500,000.00  | \$500,000.00  | \$10,000.00  | \$750,000.00  | \$340,000.00  | \$65,000.00  | \$250,000.00   | Estimated Cost                               |                                |  |

| ID0103   |                            | ID0325   | ID0090   | ID0086   |                                | ID0432   | Identifier                                   | Work States                    | Part II: Sup   |
|--|----------------------------|--|--|--|--------------------------------|--|--|--------------------------------|--|
| Install Storage Sheds(Dwelling Unit-Site Work (1480)-Other)  | SCATTER SITE (PA022000005) | Sealcoat & Restripe Parking Lots(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving) | Diakin - HVAC Upgrade(Dwelling Unit-Site Work (1480)-Other)  | Remodel Kitchens(Dwelling Unit-Interior (1480)-Kitchen Cabinets) | BROAD PARK MANOR (PA022000004) | Utility Pole Repairs - Parkway(Non-Dwelling Site Work (1480)-Site Utilities) | Development Number/Name                      | Work Statement for Year 5 2027 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
| Install 1 storage shed at 17 units  115 S. Pershing(2) 515 N. Beaver (1) 412 W. North (1) 414 W. North (2) 30-32 Hartley (5) |                            | Sealcoat & Restripe Parking Lots - est 5000 sq ft  | Upgrade existing Diakin HVAC system in 133 Bldg - 27 systems | Remodel Kitchens (new appliances, cabinetry)                     |                                | Repair YHA owned utility poles - 6 total                                     | General Description of Major Work Categories |                                |  |
|  |                            |  |  |  |                                |  | Quantity                                     |                                |  |
| \$30,500.00  | \$30,500.00                | \$50,000.00  | \$2,500,000.00   | \$250,000.00   | \$2,800,000.00                 | \$121,600.00   | Estimated Cost                               |                                |  |

| Work Statement for Year 5 2027  Identifier Development Number/Name General Description of Major Work Categories Quantity Estimated Cost | Part II: Supporting Pages - Physical Needs Work Statements (s) |  |          |           |
|---|--|--|----------|-----------|
| Development Number/Name  General Description of Major Work Categories  Quantity   | 5  |  |          |           |
|   |  | General Description of Major Work Categories | Quantity | Estimateo |

315 W. King (2)

| \$900,000.00   | Replace 100 existing A/C units and shelves holding units        | Replace wall A/C units and Shelves(Dwelling Unit-Interior (1480)-Mechanical) | ID0132 |
|----------------|---|--|--------|
| \$125,000.00   | Replace 100 existing refrigerators with energy star models      | Replace Refridgerators(Dwelling Unit-Interior (1480)-Appliances)             | ID0131 |
| \$1,025,000.00 |   | STONY BROOK MANOR (PA022000008)  |        |
| \$50,000.00    | Replace rooftop cooling tower with energy efficient replacement | Replace Cooling Tower - (Dwelling Unit-Interior (1480)-Mechanical)           | ID0433 |
| \$60,000.00    | Replace 30 existing refridgerator with energy star models       | Replace Refridgerators(Dwelling Unit-Interior (1480)-Appliances)             | ID0120 |
| \$110,000.00   |   | SPRINGFIELD (PA022000007)  |        |

|                         | ID0438   | ID0437   | ID0436   | ID0435   | ID0434   |                                | Identifier                                   | Work Stater               | Part II: Sup   |
|-------------------------|--|--|--|--|--|--------------------------------|--|---------------------------|--|
| AUTHORITY-WIDE (NAWASD) | Renovate 3 units(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers) | Renovate 5 units(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers) | Renovate 5 units(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers) | Renovate 5 Units(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers) | Renovate 5 units (Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers) | EASTWOOD TERRACE (PA022000009) | Development Number/Name                      | Work Statement for Year 5 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                         | renovation to include upgrade electric panel Install new window and dedicated circuit for A/C Install new tub surround Install new aux heat replace outdoor shed   | renovation to include upgrade electric panel Install new window and dedicated circuit for A/C Install new tub surround Install new aux heat replace outdoor shed   | renovation to include upgrade electric panel Install new window and dedicated circuit for A/C Install new tub surround Install new aux heat replace outdoor shed   | renovation to include upgrade electric panel Install new window and dedicated circuit for A/C Install new tub surround Install new aux heat replace outdoor shed   | renovation to include upgrade electric panel Install new window and dedicated circuit for A/C Install new aux heat Install new aux heat replace outdoor shed   |                                | General Description of Major Work Categories |                           |  |
|                         |  |  |  |  |  |                                | Quantity                                     |                           |  |
| \$1,155,000.00          | \$175,000.00   | \$250,000.00   | \$250,000.00   | \$250,000.00   | \$250,000.00   | \$1,175,000.00                 | Estimated Cost                               |                           |  |

|                            | ID0448  | ID0447  | ID0446   | ID0445   | ID0440                        | Identifier                                   | Work Staten               | Part II: Supp  |
|----------------------------|---|---|--|--|-------------------------------|--|---------------------------|--|
| Subtotal of Estimated Cost | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) | Management Improvements(Management Improvement (1408)-Staff Training) | Architects / Engineering(Contract Administration (1480)-Other) | Administration(Administration (1410)-Salaries) | operations(Operations (1406)) | Development Number/Name                      | Work Statement for Year 5 | Part II: Supporting Pages - Physical Needs Work Statements (s) |
|                            | Hardware / Equipment  | Staff training  | A/E Costs  | Administration                                 | operations                    | General Description of Major Work Categories |                           |  |
|                            |   |   |  |  |                               | Quantity                                     |                           |  |
| \$9,784,700.00             | \$70,000.00   | \$50,000.00   | \$100,000.00   | \$260,000.00                                   | \$675,000.00                  | Estimated Cost                               |                           |  |

| \$50,000.00    | Manage Improvements(Operations (1406))  |
|----------------|---|
| \$70,000.00    | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)   |
| \$100,000.00   | Arch. / Eng. Costs(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs)  |
| \$674,530.75   | Operations(Operations (1406))   |
| \$260,000.00   | Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)   |
| \$50,992.00    | Management Improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) |
|                | Housing Authority Wide  |
| Estimated Cost | Development Number/Name<br>General Description of Major Work Categories   |
|                | Work Statement for Year 1 2023  |
|                | Part III: Supporting Pages - Management Needs Work Statements (s)   |
|                |   |

| \$1,545,334.75 | Subtotal of Estimated Cost   |
|----------------|--|
| \$70,000.00    | Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)                           |
| \$269,812.00   | Admin Fee(Administration (1410)-Salaries,Administration (1410)-Other,Administration (1410)-Sundry) |
| Estimated Cost | Development Number/Name<br>General Description of Major Work Categories                            |
|                | Work Statement for Year 1 2023   |
|                | Part III: Supporting Pages - Management Needs Work Statements (s)                                  |
|                |  |

| \$940,000.00        | Subtotal of Estimated Cost  |
|---------------------|---|
| \$70,000.00         | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)                                     |
| \$50,000.00         | Arch. / Eng. Fees(Contract Administration (1480)-Other Fees and Costs)  |
| \$550,000.00        | Operations(Operations (1406))   |
| \$220,000.00        | Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)                 |
| <b>\$</b> 50,000.00 | Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements) |
|                     | Housing Authority Wide  |
| Estimated Cost      | Development Number/Name<br>General Description of Major Work Categories   |
|                     | Work Statement for Year 2 2024  |
|                     | Part III: Supporting Pages - Management Needs Work Statements (s)   |
|                     |   |

| \$1,080,000.00 | Subtotal of Estimated Cost   |
|----------------|--|
| \$660,000.00   | Operations(Operations (1406))  |
| \$70,000.00    | hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)                                |
| \$50,000.00    | Arch / Engineering Costs(Contract Administration (1480)-Other,Contract Administration (1480)-Other Fees and Costs) |
| \$250,000.00   | Administration (Administration (1410)-Other,Administration (1410)-Salaries)  |
| \$50,000.00    | Management Improvements(Management Improvement (1408)-Staff Training)  |
|                | Housing Authority Wide   |
| Estimated Cost | Development Number/Name<br>General Description of Major Work Categories  |
|                | Work Statement for Year 3 2025   |
|                | Part III: Supporting Pages - Management Needs Work Statements (s)  |
|                |  |

| \$1,155,000.00 | Subtotal of Estimated Cost  |
|----------------|---|
| \$70,000.00    | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other)                       |
| \$50,000.00    | Management improvements(Management Improvement (1408)-Other,Management Improvement (1408)-Staff Training) |
| \$100,000.00   | Architects / Engineering(Contract Administration (1480)-Other)  |
| \$260,000.00   | Administration (Administration (1410)-Salaries)   |
| \$675,000.00   | Operations(Operations (1406))   |
|                | Housing Authority Wide  |
| Estimated Cost | Development Number/Name<br>General Description of Major Work Categories                                   |
|                | Work Statement for Year 4 2026  |
|                | Part III: Supporting Pages - Management Needs Work Statements (s)   |
|                |   |

| \$1,155,000.00 | Subtotal of Estimated Cost  |
|----------------|---|
| \$70,000.00    | Hardware / Equipment(Non-Dwelling Equipment-Expendable/Non-Expendable (1480)-Other) |
| \$50,000.00    | Management Improvements(Management Improvement (1408)-Staff Training)               |
| \$100,000.00   | Architects / Engineering(Contract Administration (1480)-Other)                      |
| \$260,000.00   | Administration(Administration (1410)-Salaries)                                      |
| \$675,000.00   | operations(Operations (1406))   |
|                | Housing Authority Wide  |
| Estimated Cost | Development Number/Name<br>General Description of Major Work Categories             |
|                | Work Statement for Year 5 2027  |
|                | Part III: Supporting Pages - Management Needs Work Statements (s)                   |
|                |   |