Annual PHA Plan (Standard PHAs and Troubled PHAs)

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:MOLINE HOUSING AUTHORITY					
	☐ 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 Ea				n Each Program	
		THA Coue	1 rogram(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:					

В.	Plan Elements				
B.1	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. □ Community Service and Self-Sufficiency 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):				
	*See Attachment (a) for listing of ACOP & Administration Plan changes *See Attachment (b) for Financial Resources changes				
	(c) The PHA must submit its Deconcentration Policy for Field Office review.				
	*See Attachment (c) for Deconcentration Policy				
B.2	New Activities.				
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?				
	Y N				
	(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.				

B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.				
D					
	The MHA has met over 20% of its goals that were set in the FY 2020-2025 5-Year Plan and has continued to operate in accordance to the MHA Mission Statement. Some of the goals met include those in the following areas:				
	 Management Issues Expansion of Meeting the Affordable Housing Stock Issues Lease and Occupancy Marketability and Security Issues 				
	Tenant-Based Housing Issues				
	 Maintenance and Capital Fund Issues Equal Opportunity Issues 				
	 Fiscal Responsibility Issues Public Image 				
	HUD Strategic Goals				
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.				
	5-Year Action Plan for 2019-2023 Approved on 01/06/2020				
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.				
C.I	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan?				
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C.I	(a) Did the RAB(s) have comments to the PHA Plan?				
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C.I	(a) Did the RAB(s) have comments to the PHA Plan? Y N I I (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				
C.2	 (a) Did the RAB(s) have comments to the PHA Plan? Y N □ (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. 				
	(a) Did the RAB(s) have comments to the PHA Plan? Y N □ (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. *See Attachment (d) for Resident Advisory Board (RAB) Comments.				
	(a) Did the RAB(s) have comments to the PHA Plan? Y N □ □ □ (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. *See Attachment (d) for Resident Advisory Board (RAB) Comments. 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.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 □ ⊠ 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						
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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))

- B. Pl
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aı	Elements. 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 other 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. (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. (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))
	Rent Determination. 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 expansion 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 public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (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

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

	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))
B.2	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))
	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))

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).

- 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.

2022 Admissions and Continued Occupancy Policy

Chapters of the ACOP with substantive revisions: [changes are denoted as MHA or Nan McKay (Nan)]

Chp. 2	Nan	Page 2-11	Sect. 2-III.A – adding options for remote hearings for Limited English Proficiency persons
Chp. 3	Nan	Page 3-1	Chapter 3 Introduction – adding that an applicant receiving a duplicative subsidy is not eligible for public housing
	Nan	Page 3-13	Sect. 3-II.D. – adding other consent forms as needed to collect information relevant to a family's eligibility
	Nan	Page 3-13	Sect. 3-II.E. – adding section re EIV system searches for existing tenants, debts owed to PHAs, and approving new assistance contingent on proof of end of participation from previous assisted property
	МНА	Page 3-17	Section 3-III.C restricting MHA background checks for any convictions occurring more than 6 months prior to the application, per new Illinois Public Housing Access Bill, SB1980 passed in early 2021
Chp. 5	МНА	Page 5-5	Sect. 5-II.B. – changing rule so that unit rejection will now result in removal from waiting list rather than return to bottom of waiting list
	МНА	Page 5-6	Sect. 5-II.C. – adding Ex. Dir. discretion to extend time for accepting or refusing a unit offer within 3 business days
	МНА	Page 5-7	Sect. 5-II.D. – same as Sect. 5-II.B. change, above
Chp. 10	МНА	Page 10-4	Sect. 10-II.C. – deleting examples of prohibited dangerous dogs such as pit bulls
Chp. 14	Nan	Page 14-3	Sect. 14-I.B. – adding MHA option to offer remote informal hearings for denials of admission, including how to conduct such hearings
	Nan	Page 14-15	Sect. 14.III.E. – adding that MHA will offer technical assistance if needed if a hearing will be conducted remotely.
	Nan	Page 14-17	Sect. 14.III.G. – allowing residents to provide documents prior to

the hearing through various options

Nan Page 14-18 Sect. 14.III.G. – clarifying how remote hearings will be

Conducted

Nan Page 14-21 Sect. 14.III.H. – restatement of "hearsay" evidence definition

Appx. A MHA Revised Income Limit table

Appx. C MHA Revised Flat Rent schedule

Appx. I

Lease - Part 2

MHA Page 2 Par. 8 – adding that all adults signing lease are jointly and

severally liable for rent and other obligations

MHA Last page adding emergency plumbing situations for certain SV and HH

units

Appx. I

Maint. Chgs.

MHA Updated schedule of maintenance charges

Appx. L

Rules & Regs

MHA Page 7 Prohibiting use of motorized bicycles on MHA property

MHA Page 7 Deleting prohibition of SB children not allowed to play in SV

MHA Page 9 Prohibiting use of motorized bicycles on MHA property

2022 Admin Plan Summary of Changes

Chapters of the Admin Plan for the Section 8 Housing Choice Voucher Program with substantive revisions:

[changes are denoted as MHA or Nan McKay (Nan)]

Chapter 2	Nan	Page 2-8	Sect. 2-II.E. – adding that, if MHA denies a request for an accommodation, the notice will inform the family of their right to appeal through an informal hearing
	Nan	Page 2-10	Section2-III.B. – adding that, if MHA offers remote interpretation services for Limited English Proficient persons, it will use video conferencing rather than voice-only interpretation
Chapter 3	Nan	Page 3-9	Sect 3-II.A. – clarifying that income eligibility is determined by company family's annual income to HUD' published income limits
	Nan	Page 3-13	Sect. 3-II.D adding HUD-52675 Debts owed form as one of the consent forms to be provided
	Nan	Page 3-17	Sect. 3-II.F. – adding requirement that MHA contact prior assisted landlord to confirm official end of participation before approving assistance
Chapter 5	Nan	Page 5-2	Sect. 5-I.B adding provisions for in-person, group, and remote program briefing procedures offered by MHA
Chapter 6	МНА	Page 6-34	Sect. 6-III.A. – eliminating option to pay a utility reimbursement directly to the family
Chapter 8	Nan	Page 8-12	Sect. 8-II.C. – adding that units must be inspected "biennial" rather than "annually"
	Nan	Page 8-13	Sect. 8.II.E. – changing the quality control inspection sampling methodology
	Nan	Page 8-13	Sect. 8.II.F. – deleting "facsimile" as an approved form of notification for life-threatening inspection violations that must be corrected
Chapter 9	МНА	Page 9-5	Sect. 9-I.D. – adding that MHA will conduct a Rent Burden analysis at every annual certification whenever

a family is over-housed

Chapter 10	Nan	Page 10-12	Sect. 10-II.B. – correcting language error in original version of rule about billing and receiving housing authorities
Chapter 11	МНА	Page 11-4	Sect. 11-I.D. – adding that MHA will conduct a Rent Burden analysis at every annual certification whenever a family is over-housed, and it will cease assisting the family at that unit if it is deemed not affordable
Chapter 13	МНА	Page 13-11	Sect. 13-II.C adding option for owners to request MHA hold HAP payment for tenants who are in process of being evicted
Chapter 16	Nan	Page 16-9	Sect. 16-III.B. & Section 16-III.C. – adding various provisions for remote informal reviews and hearings, including how they are to be conducted
	Nan	Page 16-20	Sect. 16-III.C. – restatement of "hearsay" evidence definition
Chapter 17	Nan	Page 17-6	Sect. 17II.B. – changes to advertising and solicitation of proposals for Project Based Voucher program (PBV) – MHA has no PBV program

Financial Resources:				
Planned Source	es and Uses			
Sources	Planned \$	Planned Uses		
1. Federal Grants				
(FY 2022 Grants)				
a) Public Housing Operating Fund	\$700,000	PH Operations		
b) Public Housing Capital Fund	\$1,050,000	Modernization		
c) HOPE VI Revitalization				
d) HOPE VI Demolition				
e) Annual Contributions for Section 8 Tenant- Based Assistance	\$1,000,000	Rental Assistance		
f) PHDEP (including any Technical Assistance funds)				
g) ROSS Grants	\$207,770	FSS & ROSS Programs		
h) CDBG				
i) HOME				
Other Federal Grants (list below)				
2. Prior Year Federal Grants (list below)				
(unobligated funds only)				
Capital Fund 501-19	\$127,914	PH Capital Improvements		
Capital Fund 501-20	\$1,011,822	PH Capital Improvements		
Capital Fund 501-21	\$1,016,432	PH Capital Improvements		
3. Public Housing Dwelling Rental				
Income	\$1,700,000	PH Operations		
4. Other Income (list below)				
5. Non-Federal Sources (list below)				
Total Resources	\$6,813,938			

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

MHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of MHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

MHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, MHA must comply with the following steps:

Step 1. MHA must determine the average income of all families residing in all MHA's covered developments. MHA may use the median income, instead of average income, provided that MHA includes a written explanation in its annual plan justifying the use of median income.

MHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. MHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, MHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

MHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

- Step 3. MHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (federal poverty level or 30percent of median income, whichever number is higher).
- Step 4. MHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.
- Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, MHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances MHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by MHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and MHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under MHA's deconcentration policy. MHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under MHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, MHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

For developments outside the EIR MHA will take the following actions to provide for deconcentration of poverty and income mixing:

MHA will strive to create mixed-income communities and lessen the concentration of very-low income families within the Housing Authority's public housing developments through admissions policies designed to bring higher income tenants into lower income developments and lower income tenants into higher income developments. This policy shall not be construed to impose or require any specific income or racial quotas for any public housing development owned by MHA.

RAB Comment

Moline Housing Authority Resident Advisory Board Comments and Recommendations December16, 2021

My name is Tammy Jones and I am the President for the Resident Advisory Board. The other members of the board are Ira Westlund representing Section 8, Katherine Williams representing Spring Valley, and Joni Feliksiak representing Spring Valley.

Each year the RAB is asked to review, solicit resident comments, and make recommendations to the Moline Housing Authority staff and Board of Commissioners regarding the Agency Plan.

The RAB met and attended meetings to solicit comments regarding changes in the plan. We did not receive comments from the residents regarding the proposed changes. The RAB is endorsing the proposed changes.

Sincerely,

Tammy Jon &

RAB President

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)

U. S Department of Housing and Urban Development

Office of Public and Indian Housing OMB No. 2577-0226 Expires 3/31/2024

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, K. J. Whitley , the Community	& Economic Development Program Manager				
Official's Name	Official's Title				
certify that the 5-Year PHA Plan for fiscal year year 2022 of the Moline Housing Authority PHA Name	is consistent with the				
Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the					
City of Moline, IL Local Jurisdi	otion Nama				
Local Jurisan	ction Name				
pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7	(o)(3) and 903.15.				
Provide a description of how the PHA Plan's conte State Consolidated Plan.	ents are consistent with the Consolidated Plan or				
The Moline Housing Authority PHA Plan is consistent with					
the City of Moline, Consolidated Plan in terms of providing Safe, decent, affordable housing and proactively addressing					
the Community's housing related is	5005,				
I hereby certify that all the information stated herein, as well as any information provide prosecute false claims and statements. Conviction may result in criminal and/or civil possess.	led in the accompaniment herewith, is true and accurate. Warning: HUD will enalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)				
Name of Authorized Official:	Title:				
K.J. Whitley	Community & Economic Development Program Manager				
Signature	Date: 1-14-2022				

The United Sutes 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. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ____ 5-Year and/or_X_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning _04/01/2022__, in connection with the submission of the Plan and implementation thereof:

- 1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
- 2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
- 3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
- 4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
- 5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
- 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
- 7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
- 8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
- 9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
- 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
- 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
- 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
- 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
- 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
- 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Moline Housing Authority PHA Name	<u>IL020</u> PHA Number/HA Code
X_ Annual PHA Plan for Fiscal Year 20_22_	
5-Year PHA Plan for Fiscal Years 20 20	_
I hereby certify that all the information stated herein, as well as any information prosecute false claims and statements. Conviction may result in criminal and/or or	provided in the accompaniment herewith, is true and accurate. Warning: HUD will civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).
Name of Executive Director	Name Board Chairman

Page 2 of 3

John Afoun

Signature

Leslie Stange-Crotty

form HUD=50077-ST-HCV-HP (3/31/2024)

John Afoun Leslie Stange-Crotty

Signature Date Signature Date

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