# **Lake County Housing Authority – IL056**

PHA Annual Plan -FYB 10.1.25 FY 26



"LCHA's vision is to be a leader in affordable housing by taking an innovative and dynamic approach to developing sustainable communities throughout Lake County."

L: Lifting up others

C: Changing lives by providing sustainable Affordable Housing

**H:** Helping create success stories

**A:** And empowering families one roof at a time



Lake County Housing Authority 33928 North U.S. Highway 45 Grayslake, IL 60030 847.223.1170 https://www.lakecountyha.org

<b>Annual PHA Plan</b>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
(Standard PHAs and	Omee of Fusine and main frousing	Empirest ve/e1/2021
Troubled PHAs)		

**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.

A.	PHA Information.					
A.1	PHA Type:  Standard PFPHA Plan for Fiscal Year BPHA Inventory (Based on A Number of Public Housing (Total Combined Units/Vouc PHA Plan Submission Type  Availability of Information. location(s) where the propose available for inspection by the and main office or central office.	HA Name: The Lake County Housing Authority  HA Type: Standard PHA Troubled PHA HA Plan for Fiscal Year Beginning: (MM/YYYY): 10.1.25 HA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Imber of Public Housing (PH) Units 427 Number of Housing Choice Vouchers (HCVs) 3282 Intal Combined Units/Vouchers 3709 HA Plan Submission Type: Annual Submission  Revised Annual Submission  Revised Annual Submission  Revised Annual Submission  A PHA must identify the specific cation(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are aliable for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) d main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also couraged to provide each resident council a copy of their PHA Plans.				
	PHA Consortia: (Check b	Consortia: (Check box if submitting a Joint PHA Plan and complete table below)  Program(s) not in the No. of Units in Each Program				
	Participating PHAs	pating PHAs PHA Code Program(s) in the Consortia	Program(s) in the Consortia	Program(s) not in the Consortia	PH	HCV
	Lead PHA:				TH.	nev

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):
	Please see attachment B.1 for updated Financial Resources.  (c) The PHA must submit its Deconcentration Policy for Field Office review.  Please see attachment B.1
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    Moes Hope VI or Choice Neighborhoods.   Demolition and/or Disposition 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 Project-Based Rental Assistance or Project-Based Vouchers under RAD.   Occupancy by Over-Income Families.   Occupancy by Police Officers.   Non-Smoking Policies.   Project-Based Vouchers.   Units with Approved Vacancies for Modermization.   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. Please see attachment B.2
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. Please see attachment B.3

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. Please see HUD form 50075.2 for FY20xx-20xx approved on XX/XX/XX.
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	☐ ☑  If yes, please describe:
C.	
<b>C.</b>	Other Document and/or Certification Requirements.
C.1	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.
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.
	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 □ ⊠
	If yes, include Challenged Elements.
	n yes, metade chanenged zichionas.
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

Fair Housing	Goal: Educate landlords regarding fair housing
	nousing strategies and actions to achieve the goal
Continue prom	oting fair housing laws and conduct a broad-based educational campaign to counter misperception ble and accessible housing.
Fair Housing	Goal: Expand fair housing outreach, education, and enforcement
	nousing strategies and actions to achieve the goal
	vative ways to conduct outreach and education, develop an online education and training
	nglish and Spanish. Provide referrals to HUD and FHAP agencies for investigations of allege
fair housing v	
9	
Fair Housing	Goal: Prevent Involuntary displacement and stabilize neighborhoods
	nousing strategies and actions to achieve the goal
	g is available, provide emergency rental assistance to families experiencing instability. Provide
	ation and budget management to renters and homeowners to ensure long term stability.
	State of the state

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

**A. PHA Information.** All PHAs must complete this section. (24 CFR §903.4)



Lake County Housing Authority 33928 North U.S. Highway 45 Grayslake, IL 60030

# **B.1 – PLAN ELEMENTS – Revision of Existing PHA Plan Elements**

The following PHA Plan elements have been revised by ILO56 Lake County Housing Authority [LCHA]

## **Financial Resources**

FY	2026 Planned Financial Sources	and Uses		
Estimates from previous year's funding				
PHA Anticipated Resources	Planned Dollar Amounts	Planned Uses		
Annual Contributions for S8 Tenant-	\$36,204,935	3282 Is the maximum number of low-		
Based Assistance (2025)		income families that can be served (based		
		on PIC data at the time of submission)		
Public Housing Operating Fund	\$394,000	Operations		
Public Housing Capital Fund	\$1,583,084	Various Projects as noted in the latest EPIC submission		
	Other Federal Grants			
Family Self-Sufficiency Grant	\$250,045 annually \$500,090	Family Self Sufficiency HCV & PH		
Ross Service Coordinator	\$79,750 annually \$239,250	Public Housing Self-sufficiency		
RADON Remediation Grant	\$179,890 annually \$593,670 Public Housing Radon Remediation			
FCC-ACP Grant	\$167,383	Public Housing Internet		
	Prior Year Capital Funds			
	Un-Disbursed			
IL01P056501-23	\$308,157	Public Housing General Capacity Activity – planned activities		
IL01P056501-24	\$1,143,602	Public Housing General Capacity Activity –		
		planned activities		
Public Housing Tenant & Miscellaneous Income				
Rental Income	\$1,600,500	Public Housing Operating Expense		
Miscellaneous Income	\$125,000	Public Housing Operating Expenses		
Demo/Dispo Funds	\$2M	Restricted development		

**B.1.c.** Deconcentration: If at any time, one of LCHA's public housing properties has an average tenant income more than 15 percent higher than the LCHA-wide average income, by bedroom size, extremely low and very low-income applicants will be targeted for admission until it is within 15 percent of LCHA-wide average income. In addition, LCHA may offer voluntary transfers from higher-income properties to lower-income properties to help achieve deconcentration goals.

#### **B.2 - PLAN ELEMENTS - New Activities**

ILO56 Lake County Housing Auth ority [LCHA] intends to undertake the following new activities in the PHA's current and upcoming FYB 10.1.2025.

#### Mixed Finance Modernization or Development.

LCHA is currently under a Section 18 Demolition and Disposition plan. This plan involves the removal of more than 100 single-family public housing homes from the LCHA inventory. LCHA will consider utilizing proceeds from the plan in a mixed-finance project or development.

#### **Demolition and/or Disposition.**

LCHA's repositioning plan:

**Repositioning Assistance**: In coordination with the U.S. Department of Housing and Urban Development, Strategic Plan 2018-2022, the Lake County Housing Authority will continue to focus on resolutions to the struggles of the Lake County community to find affordable housing.

Lake County Housing Authority must move away from the policies and programs of the past and develop an innovative approach that is more responsive to the community; and anticipates the public housing essentials of the future while addressing current needs. In devising a strategic plan, LCHA will examine:

- Capital needs of property
- Cost to operate
- Future HUD funding potential
- Market demand
- Existing debt or other obligations

LCHA will facilitate the preservation, rehabilitation, or demolition of units by utilizing existing HUD-provided tools:

- Rental Assistance Demonstration (RAD)
- Demolition & Disposition (Section 18)
- RAD/Section 18 Blends
- HUD's Subject Matter Experts (SMEs)

By implementing the above, LCHA will deliver units that are in better physical condition and provide long-term availability of affordable housing and rental assistance in the local community.

**Background**: LCHA began the Disposition plan with 496 units in 2020. The Lake County Housing Authority wants to explore options for converting its elderly/disabled development, consisting of 207 units. Additionally, the LCHA wants to know what choices under the options we have for two scattered-site properties, totaling 61 single-family homes. The Repositioning Panel advises that LCHA has several options to consider for its portfolio and could do them in different phases.

#### First LCHA- Scattered Site units (161 single-family homes)

- The units must also be in non-contiguous buildings with four or fewer units. Additionally, the LCHA must have a relocation plan with the option for residents to remain using Project-Based Vouchers (PBVs) or Tenant Protection Vouchers (TPV) under the Housing Choice Voucher (HCV) program.
- LCHA could dispose of the properties to a third-party entity under state law, including a non-profit, and could retain ownership or control. The options discussed during the call included:
  - Selling the property at Fair Market Value and using the net proceeds to maintain other LCHA PH properties.
  - Disposing of the property below fair market (Commensurate public benefit. Use restriction required)
  - Creating a local Homeownership program under Section 32 (Exploring under AIM North Nonprofit).
- TPVs are available for all units occupied by assisted tenants within the previous 24 months at the HUD's Special Application Center (SAC) approval time.
  - Eligible to project-based 100% of property; however, families could request a voucher to move after one year.
  - LCHA has seven (7) over-income families that would not be eligible for a Tenant Protection Voucher (TPV) under Section I8. LCHA would have to provide comparable housing for the seven families.

**UPDATE**: LCHA has begun the Section 18 process for the 161 Single-family homes and as of this submission has officially disposed of 75 with 25 approved and LCHA has received 32 TPVs thus far.

## Second LCHA -Elderly /Disabled Properties (2 sites totaling 160 units)

- LCHA will continue to explore options for a blended conversion for a mixed development.
- These properties would be strong Rental Assistance Demonstration (RAD) candidates.
- Additionally, LCHA may consider submitting a Section 18 under the RAD/Section 18 blend if the units
  will be substantially rehabilitated without the use of 9% Low-Income Housing Tax Credits. Substantially
  rehabilitated means hard construction costs over 60% of Housing Construction Costs (published by
  HUD).
- If eligible, SAC will approve the disposition of 25% of the project units under Section 18 and replace those units with Section 18 TPVs. If the properties are in an Opportunity Zone, they may qualify for the RAD \$100 PUM rent boost for a PBRA conversion.
- TPVs will be issued based on the occupancy of the public housing units being removed through Section 18 when the SAC application is approved. Those vouchers may be project-based. RAD units are not eligible for TPVs.

#### Remaining 175 Units

• If LCHA submits applications based on the LCHA one and LCHA two options, they would have 175 PH units remaining and consider submitting an application under Streamlined Voluntary Conversion (SVC) for the remainder of its inventory. Under SVC, conversion to PBV requires tenant consent. Tenants have the right to remain in their unit with the TPV, or take the TPV and rent in the private market, or accept a PBV and remain in the unit (must be in writing)

LCHA could remove the remaining 175 units via the RAD/Section 18 Close-out Blend, where 125 units
are converted through RAD, and the last 50 units are converted through Section 18. The LCHA would
project based on the TPVs obtained for the 50 Section 18 units, and the LCHA would not need tenant
consent.

#### Additional Takeaways:

- LCHA will continue assessing what options are best for the community and the families needs before they consider selling units at fair market value or PBV.
- Only applications submitted through Section 18 are eligible for ARF and DDTF. RAD and Streamlined Voluntary Conversions are not eligible.
- Under RAD, LCHA can maintain PH reserves after conversion. Under Section 18 or SVC, LCHA has up until
  the transaction's closing to spend down any PH reserves. LCHA cannot use PH reserves to support any
  Section 8 projects.

#### **Next Steps: Option**

- LCHA will have a PNA completed for its public housing properties (Sr. Buildings)
- LCHA will follow up with the Chicago Field Office (FO) with any additional questions, comments, or concerns.

## **Designated Housing for Elderly and/or Disabled Families.**

LCHA has submitted renewal elderly designation for seven (7) public housing buildings consisting of two Asset Management Developments (AMPs): 1L056000003 and IL056000002.

#### Conversion of Public Housing to Tenant-Based Assistance.

LCHA has no required conversions, however, LCHA will be evaluating Public Housing to Tenant-Based Assistance conversion options as noted in the Demolition and Disposition section of this document and per the analysis of the Repositioning Panel consulted in LCHA's strategic plan.

#### Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.

LCHA will be evaluating Public Housing to Tenant-Based Assistance conversion options as noted in the Demolition and Disposition section of this document and per the analysis of the Repositioning Panel consulted in LCHA's strategic plan.

#### Occupancy by Over-Income Families.

Public Housing Over-income tenants – see summary below and refer to the Admissions & Continued Occupancy Policy for detailed information.

LCHA is compliant with HOTMA provisions for over-income families. If a Tenant's projected income at the time of annual reexamination or interim adjustment exceeds the income limit for continued occupancy (120 percent of Area Median Income, adjusted for family size) the LCHA will inform the Tenant that if their income continues to exceed this income limit at their annual reexamination for two more consecutive years the Tenant must move out of public housing in six months.

#### **Occupancy by Police Officers**

LCHA continues to evaluate the safety needs of each development. Currently, LCHA is contracting with local law enforcement for dedicated security patrols. Should there be an escalation in crime or the need for additional safety measures LCHA intends to seek HUD approval to utilize two (2) units as police units. We intend to host police units at Beach Haven Tower – 730 Golfview Dr. Round Lake Beach, IL 60073, and Shiloh Tower – 1525 27<sup>th</sup> St. Zion II 60099.

LCHA will determine exact units based on tenant attrition and specialized needs and will specify those units when seeking written approval from HUD. LCHA will enter a Memorandum of Understanding, or other form of contractual agreement, between PHA and Local Law Enforcement Agencies or a Use Agreement specifying the terms and requirements of the officer residing in the designated unit.

Under 24 CFR 960.505, PHAs are required to provide the HUD Field Office with a statement indicating that occupancy by Police Officers is necessary to increase security for public housing residents. The terms and conditions of the Police Officer's tenancy must be included in the PHA Plan, along with a statement that such occupancy is needed to increase security for public housing residents.

As per the requirements, the unit will be used as a full-time dwelling unit, and a written lease will be executed. Units that house Police Officers who must actively provide security to (including patrolling) the development(s) as a condition of tenancy, may be eligible for a full Operating Fund Grant. If the community conditions that created the need to house Police Officers in the development cease to exist, LCHA will make these units available to eligible program participants.

#### **Project-Based Vouchers.**

LCHA has exercised the MTW expansion to Project Base up to the lower of 50% of the total authorized units or 50% of the Budget Authority.

LCHA also plans to adopt and implement alternative competitive processing in awarding Project Base Vouchers as allowed in the MTW expansion. Developments that have been awarded funding through Low-Income Housing Tax Credits, HOME funding, or CDBG funding will be accepted as an alternative to a Request for Proposal to Project Base a development.

LCHA has 602 current Project Based Vouchers with 153 in process as noted below:

Development	# of Vouchers	Status
A Safe Place I	17	HAP
A Safe Place II	20	HAP
Brookstone Coles Park	131	HAP
Colonial Park Apts.	60	HAP
Fairhaven Crossing	14	HAP
Library Lane	135	HAP
Regency Coles Park	48	HAP
Woodstone Apts.	59	HAP
Lake Front Sr Res	25	HAP
Tiffany Apts.	28	HAP
Lake Zurich	2	HAP
Mundelein Sr. Apts.	45	HAP
Beech Street Sr. Lofts	18	HAP
Rosewood	153 *AHAP 2025	Pending
TOTAL PBV	<b>602</b> [+153] = 755 adjust after	

#### Units with Approved Vacancies for Modernization.

Under 24 CFR 990.145, PHAs are eligible to receive Operating Fund grant funding for certain vacant public housing units that are under ACC. Each of these approved vacancies requires that the PHA request an approval Letter from the HUD Field Office. LCHA intends to seek HUD approval for units in its AMP 4 and AMP 5 that require significant modernization. LCHA intends to target up to ten (10) units where the unit is required to be vacant to accomplish the modernization (i.e., renovating the kitchen/bathroom where it would leave the tenant without either facility would require the unit to be vacant or address any health hazards). LCHA will list specific units within its request for approval. Units will be selected and or approval will be requested based on tenant attrition and priority of unit needs.

This modernization work will be accomplished using both Capital and Operating Funds. Upon completion of all modernization work, that required the unit to be vacant, even if additional modernization work continues, LCHA will either re-occupy the unit by an eligible family or place the unit in Vacant status. Modernization plans can be referenced in our most recent HUD-approved Capital Fund submission.

#### **Other Capital Grant Programs.**

LCHA intends to seek grant funding under the Emergency Safety and Security Grants.

#### **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.

The Lake County Housing Authority (LCHA) continues to make significant strides in achieving its goals, thanks to our ongoing partnership with the Lake County government. Together, we are dedicated to improving the response to the homeless crisis by leveraging LCHA's diverse special-purpose program options, including Mainstream, Emergency Housing Vouchers, VASH Vouchers, and, newly added in FY24, 15 Fair Share Vouchers, all of which target special needs populations.

One of our key initiatives, the Section 18 Demo/Disposition program, has shown remarkable progress. Over the past four years, we have successfully disposed of 75 single-family homes, with an additional 25 currently in progress. These homes have been sold to various parties, including affordable housing providers, investors with the intent to maintain the Tenant Protection Vouchers (TPV) under the Housing Choice Voucher (HCV) program, and in particularly satisfying transactions, to the families residing in the homes who can purchase them. This ensures the continuity of affordable housing options within Lake County. The proceeds from the sale of these homes have generated Tenant Protection Vouchers, which are now benefiting eligible families in need.

Looking ahead, LCHA remains committed to aggressively completing the Demo/Dispo program over the next four years. This initiative not only significantly reduces operational costs for the agency but also provides opportunities for further development using the proceeds from the program. Additionally, LCHA continues to build affordable housing through its project-based voucher program, fostering several partnerships and expanding the development of affordable housing.

Based on funding availability, LCHA plans to project-base approximately 200 vouchers in new developments, which will have a direct impact on poverty deconcentration efforts and increase the number of affordable housing units available.

Furthermore, LCHA has entered into an intergovernmental agreement with the Lake County Government, consisting of \$609,000 to directly assist residents still facing housing instability and eviction.

LCHA continues to aggressively address voucher utilization and has maintained a voucher utilization of 97%+ through calendar year 24 and in to 2025. LCHA has experienced a significant increase in area rents realzing an increase in the Per Unit Cost [PUC]. LCHA is currently operating in shortfall. As such, shortfall prevention strategies have been enacted.

Presently, there are approximately 630 applicants on the Housing Choice Voucher (HCV) waiting list. The current composition of the Authority's applicants underscores the pressing need for affordable housing, with 85% representing extremely low-income households, the demographic with the highest need. Furthermore, the waiting list data highlights the necessity to assist a diverse range of households, including 14% headed by disabled individuals with special needs and 4% comprising low-income seniors on fixed incomes. To address these needs, LCHA actively engages in affirmative furthering fair housing with its marketing and collaborates with local agencies that support seniors and persons with disabilities, while also continuing outreach efforts to private property owners to promote the HCV program.

The waiting lists for Public Housing total more than 4,000 applicants. One bedroom elderly/disabled lists are temporarily open. The Public Housing Program encompasses elderly buildings and family scattered-site homes throughout the county. Of the approximately 4,000 applicants, 17% are elderly, 34% are disabled, and over 87% are at an extremely low income level.

## C – Other Documents and/or Certification Requirements

C.1 – Resident Advisory Board (RAB) Comments

Will be compiled after meetings.

C.2 – Certification by State or Local Officials

In process.

C.3 – Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan

Signed form to be completed upon board approval of plan.

C.4 – Challenged Elements

To be determined.