

# PHA ANNUAL PLAN FY 2021

**OCTOBER 1, 2020** 

#### 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: 02/29/2016

**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** Form HUD-50075-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 <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS 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 Name: PHA Code:						
	PHA Type: Standard PHA Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY):						
	PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  Number of Public Housing (PH) Units Number of Housing Choice Vouchers (HCVs) Total Combined						
	Units/Vouchers   PHA Plan Submission Type:						
	Availability of Information. PHAs must have the elements listed below in sections B and C 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.						
	Participating PHAs PHA Code Program(s) in the Consortia Program(s) not in the No. of Units in Each					n Each Program	
	Lead PHA:			Consortia	PH	HCV	
	Lead PHA.						

В.	Annual Plan Elements
B.1	Revision of 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):
	(c) The PHA must submit its Deconcentration Policy for Field Office review.  See Attachment B, Section B.1(c)
<b>B.2</b>	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 Project-Based Assistance under RAD.   Occupancy by Over-Income Families.   Occupancy by Police Officers.   Non-Smoking Policies.   Project-Based Vouchers.   Units with Approved Vacancies for Modernization.   Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).  See Attachment C, B.2(a)
	(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
D 2	projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
В.3	Civil Rights Certification.  Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment D, B.3
B.4	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	(b) If yes, please describe:

B.5	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.			
B.6	Resident Advisory Board (RAB) Comments.			
	(a) Did the RAB(s) provide comments to the PHA Plan?			
	Y N CO 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.			
B.7	Certification by State or Local Officials.			
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment F, B.7			
B.8	Troubled PHA.  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y N N/A  D D D D  (b) If yes, please describe:			
C.	<b>Statement of Capital Improvements</b> . Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).			
C.1	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.			



## Attachment A Section B.1(b)

#### **Revision of PHA Administrative Plan Elements**

The Lake County Housing Authority (LCHA) is proposing the below changes to the Administrative Plan to reflect updates in regulations, LCHA operations, to comply with the administration of the LCHA HCV program, and ensure staff consistency in the implementation of the LCHA Administration Plan.

The following Chapters have been revised in the LCHA Administrative Plan: Chapter 12-II -C. Alternatives to Termination of Assistance Chapter 16-1V.B. Repayment Policy

#### Amending the HCV Administrative Plan - Repayment Agreements

The repayment agreement policy is being modified to make the process more conducive for unreported income processing. We have modified the time frames for reporting changes from 10 days to 30 days to allow families an opportunity to report accurately. The 30-day reporting time frame also lessens the burden of case managers spending excessive time and resources verifying recent income when families have not yet received enough documentation to support their income changes. We have changed the initial down payment amount from 1/3 of debt owed to 10% of debt owed to lessen the deposit amount for the repayment agreement. Additionally, we have increased the amount of debt we will enter into a repayment agreement from \$4,000 to \$5,000. We are introducing a repayment schedule to allow a variety of payment options, so our families aren't burdened with paying their rent in addition to making a substantial payment towards their debt. The changes should also lessen the amount of terminations and hearings which often cause an administrative burden and force our families to attend multiple meetings and appointments.

# CHAPTER 12 TERMINATION OF ASSISTANCE AND TENANCY 12-II.C. ALTERNATIVES TO TERMINATION OF ASSISTANCE

#### Repayment of Family Debts

#### **REMOVE:**

**LCHA Policy** 

If a family owes amounts to the PHA, as a condition of continued assistance, the PHA will require the family to repay the full amount or to enter into a repayment agreement, within 60 days of receiving notice from the PHA of the amount owed. See Chapter 16 for policies on repayment agreements.

#### REPLACE WITH:

**PHA Policy** 

If a family owes amounts to the PHA, as a condition of continued assistance, the PHA will require the family to repay the full amount or to enter into a repayment agreement, within 30 days of receiving notice from the PHA of the amount owed. See Chapter 16 for policies on repayment agreements.



## CHAPTER 16 PROGRAM ADMINISTRATION 16-IV.B. REPAYMENT POLICY

Family Debts to the PHA

**REMOVE:** 

**PHA Policy** 

Omit paragraphs 1 and 2

REPLACE WITH:

Any amount due to the LCHA by an HCV participant must be repaid by the family. If the family refuses to pay the debt, enter into a repayment agreement within 30 days or breaches a repayment agreement, the LCHA will terminate the assistance upon notification to the family and pursue other modes of collection.

#### Repayment Agreement

#### **REMOVE:**

This Authority may actively seek prosecution in a court of law of those who have committed fraud while a program participant, and/or those who owe an amount in excess of \$4,000. This may be in conjunction with, or on the behalf of, the Office of Inspector General for HUD, or the State's Attorney(s).

#### REPLACE WITH:

PHA Policy

This Authority may actively seek prosecution in a court of law of those who have committed fraud while a program participant, and/or those who owe an amount in excess of \$5,000. This may be in conjunction with, or on the behalf of, the Office of Inspector General for HUD, or the State's Attorney(s).

#### General Repayment Agreement Guidelines for Families Down Payment Requirement

#### **REMOVE:**

Omit paragraphs 1 & 2

REPLACE WITH:

PHA Policy

The LCHA will not enter into a repayment agreement for amounts in excess of \$5,000. Unreported income in excess of \$5,000 is grounds for termination. Additionally, the housing authority should report the findings to OIG for further investigation. The LCHA will require a 10% down payment of the total debt owed unless the family requests a hardship waiver of the down payment.

#### **Payment Thresholds**

#### **REMOVE:**

Omit Paragraph 2 (PHA Policy)

REPLACE WITH:

#### **PHA Policy**

Upon notice by the Authority the full amount owed by the family is due. LCHA establishes the monthly repayment amount the amount due monthly. The family has the option to pay the balance in full or make a deposit of 10% of total amount owed and pay the remaining debt in installments. Amounts less than \$500 due to the Housing Authority



#### Lake County Housing Authority 33928 North U.S. Highway 45

Grayslake, IL

do not require repayment. Amounts equaling \$500 but less than \$5,000 the Authority may, at its discretion, offer the participant an opportunity to enter into a Repayment Agreement that sets forth the schedule of monthly repayment amounts.

Payment Schedule

\$500-\$2500 debt to be paid off within 12 months

\$2500 - \$3500 debt to be paid off within 24 months

\$3500 - \$5000 debt to be paid off within 36 months

In accordance with Housing Choice Voucher income reporting requirements, income totaling \$200 or less each month are not required to be reported at interim reexaminations. For purposes of repayment agreements, staff must review to determine if unreported income would not have exceeded \$200 per month. In these cases, a repayment agreement is not required.

**Execution of the Agreement** 

**REMOVE:** 

**PHA Policy** 

Omit sentence

#### REPLACE WITH:

PHA Policy

Any repayment agreement between the LCHA and a family will be signed and dated by the PHA and by the head of household, spouse/cohead, and adult household members (if applicable).

Late or Missed Payments

**REMOVE:** 

**PHA Policy** 

Omit entire passage.

REPLACE WITH:

**PHA Policy** 

If a family misses any two Repayment Agreement payments or fails to pay the down payment at the time of their appointment, they will be notified that they are in Default, and the entire balance owed is due in full. Failure to pay the full balance within 30 calendar days will result in the termination of assistance.

#### No Offer of Repayment Agreement

**REMOVE:** 

Omit entire passage.

REPLACE WITH:

PHA Policy

LCHA does not permit a participant to enter into an agreement if there is already a repayment agreement in place with the family or the amounts owed by the family exceed the federal or state threshold for criminal prosecution. LCHA will require both amounts owed (new and current) to be paid off in full within a 30 calendar daytime frame, or face termination.



The Authority will terminate participation:

- If a family has failed to report income for any family member that was received for two years. The entire balance owed is due in full.
- If any family member has committed fraud
- If the family has already entered into 2 repayment agreements
- If a family is in DEFAULT on a repayment agreement and has not paid the remaining balance in full as required



# Attachment B Section B.1 (c)

#### **LCHA De-Concentration Policy:**

It is Lake County Housing Authority's policy to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Although this is the general policy the LCHA will not apply rigid income mixing methods. Toward this end, LCHA will skip families on the waiting list to reach other families with a lower or higher income. LCHA will accomplish this in a uniform and non-discriminating manner.

The Lake County Housing Authority will affirmatively market its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, LCHA will analyze the income levels of families residing in each of its developments, the income levels of census tracts in which LCHA developments are located, and the income levels of the families on the waiting list. Based on this analysis, LCHA will determine the level of marketing strategies and de-concentration incentives to implement.

#### **De-concentration Incentives**

The Lake County Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the de-concentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

#### Offer of a Unit

When the Lake County Housing Authority discovers that a unit will become available, staff will contact the first ten (10) or more families on the waiting list who have the highest priority for this type of unit or development and whose income category would help to meet the de-concentration goal and/or the income targeting goal in order to verify preferences claimed by the applicants. Once preferences are verified the name at the top of the list will be provided to the Housing Manager for the next available unit.

The Lake County Housing Authority will contact the family by first class mail to make the unit offer. The family will be given five (5) calendar days from the date the letter was mailed to contact the Lake County Housing Authority regarding the offer. In order to expedite the process, the LCHA will sometimes make the first contact by telephone, so that a determination of interest in the unit may be made more quickly. When a unit is rejected on the basis of a phone contact with the family, such rejection will be documented in the applicant file.

The family will be offered the opportunity to view the unit. After the opportunity to view the unit, the family will have two (2) business days to accept or reject the unit. This verbal offer and the family's decision must be documented in the tenant file. If the family rejects the offer of the unit, the Lake County Housing Authority will send the family a letter documenting the offer and the rejection



### Attachment C Section B.2 (a)

### **Units with Approved Vacancies for Modernization**

LCHA will be rehabbing PIC Unit #0131 in Shiloh Towers (AMP #2) to convert it back to a habitable apartment. Previously this unit was approved to serve as a LCHA Public Housing Administration Office. The scope of work is being developed and the work will be contracted out.

# **Civil Rights Certification** (*Qualified PHAs*)

Signature

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

#### **Civil Rights Certification**

#### **Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

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, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of

the Americans with Disabilities Act of 1990, and will affi programs or proposed programs, identifying any impedin addressing those impediments in a reasonable fashion in jurisdictions to implement any of the jurisdiction's initiat the PHA's involvement and by maintaining records reflect	nents to fair housing choice within those program, view of the resources available and working with local ives to affirmatively further fair housing that require
PHA Name	PHA Number/HA Code
I hereby certify that all the information stated herein, as well as any information provi	
prosecute false claims and statements. Conviction may result in criminal and/or civil p	penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)
Name of Authorized Official	Title

Date



#### Attachment E B.5 Progress Report

Lake County Housing Authority (LCHA) continues to provide it's low rent program residents with safe and well maintained housing and services. Focusing on obtaining high marks on inspections and surveys. LCHA aims to be a high performer in both the HCV and Low Rent programs. Its modernization program has proceeded in an orderly fashion with funds obligated and expended within program requirements.

The quality of documentation and physical work remains a top priority of the agency. Our Resident Services Coordinator provides services to elderly and disabled residents to increase their independence and well-being. Some of the events include Community Health Fairs, Financial Education, Crime and Identity Theft prevention, as well as other Social events.

The Authority has branched into the community to partner with many other agencies to provide needed services and activities. Some partnerships include but are not limited to Regional Housing Initiative (RHI), Youthbuild Lake County, Youth Conservations Corps, PADS Crisis Center, Community Action Partners, State Career College, A Safe Place, Love Inc. Catholic Charities, Oak Street Health, and many others.

LCHA continues to administer its CHOICES program. This program encourages Voucher holders to choose units in defined opportunity areas. The Brookstone and Regency at Coles Park {formerly Marion Jones Town homes) redevelopment project is now nearly 60% leased. The Brookstone senior development is now 100% occupied. Former Marion Jones residents were given the first opportunity to move into the newly completed community.

LCHA has received 50 additional Family Unification Vouchers (FUP) to provide housing to families needing assistance to remain together and Youth aging out of the foster care system.

LCHA also received 50 additional Mainstream Vouchers (MS5) to assist non-elderly homeless families with housing assistance.

In 2019, LCHA received a grant award from the Illinois Housing Development Authority in the amount of \$76,500. and an additional \$83,130. These funds will allow us to grow the LCHA Housing Counseling Program, and better address the needs of Homeowners and Renters in the Lake County area.

LCHA is currently rehabbing our 50-unit Warren Manor Senior development located in our AMP 2, by replacing siding, windows, and doors. These had not been replaced in over 36 years and will allow us to eliminate the Non-Industry Standard repairs we were using to address deteriorating issues and substantially increase Energy Efficiency throughout the development for our Senior residents.

LCHA will be rehabbing PIC Unit #0131 in Shiloh Towers (AMP #2) to convert it back to a habitable apartment. Previously this unit was approved to serve as a LCHA Public Housing Administration Office. The scope of work is being developed and the work will be contracted out.

LCHA is currently exploring the possibility of Section 18 and RAD Blending to receive Section 18 approval and vouchers for a portion of LCHA units as part of our strategy to replace and redevelop the units.

LCHA has issued an RFP to make up to forty-five (45) Housing Choice Voucher (HCV) available for Project-Based assistance. LCHA's goals is to increase and preserve affordable rental housing opportunities for lower income Lake County households.

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 2/29/2016

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

I, Jodi Gingiss , the C	Community Development Administrator
Official's Name	Official's Title
certify that the 5-Year PHA Plan and/or Annual	PHA Plan of the
Lake County Housing Authority	
PHA Name	
is consistent with the Consolidated Plan or State Co	onsolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the	
Lake County Illinois	
pursuant to 24 CFR Part 91.	Jurisdiction Name
Provide a description of how the PHA Plan is consis Consolidated Plan and the AI.	stent with the Consolidated Plan or State
The Lake County Consolidated Plan places high priority	
authority's low rent and decent, safe, sanitary, and well n	naintained housing and services.
I hereby certify that all the information stated herein, as well as any information provided prosecute false claims and statements. Conviction may result in criminal and/or civil penal	
Alexandra de la Colonia de la	I mu
Name of Authorized Official  Brenda O'Connell	Title Acting Community Development Administrator
Signature Digitally staned by Ocennetil Brends	Date
OConnell, Brenda Development to Connell Ereda, email = BOConnelliblate Date: 20206423 15:47:28 -65'00'	Stog and April 23, 2020

# Certifications of Compliance with PHA Plans 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 02/29/2016

## PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman 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 for the PHA fiscal year beginning 10/1/2020\_, hereinafter referred to as" the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) 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.
- 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 to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
- 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 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.
- 5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- 6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
- 7. For PHA Plans that includes 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 2010-25);
  - 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;
  - 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 part 903.7(c)(1).
- 8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 9. 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.
- 10. 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.
- 11. 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.

- 12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- 13. 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.
- 14. 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.
- 15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- 16. 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.
- 17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
- 18. 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.
- 19. 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).

Lake County Housing Authority	IL056			
PHA Name	PHA Number/HA Code			
X Annual PHA Plan for Fiscal Year 2020 - 2021				
5-Year PHA Plan for Fiscal Years 20 20				
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).				
Name of Authorized Official	Title			
Dr. H Lee Jordan Jr.	Chairman			
Signature	Date			
	06/18/20			