

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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	<p> PHA Name: <u>Housing Authority of Paducah</u> PHA Code: <u>KY006</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>855</u> Number of Housing Choice Vouchers (HCVs) <u>0</u> Total Combined Units/Vouchers <u>855</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): See attachment concerning the new activity of the ROSS Grant</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(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.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>See Attachment</p>

<p>B.4</p>	<p>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.</p> <p>See HUD Form 50075.2 approved by HUD on 3/9/2020</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(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.</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p>C.5</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

**HOUSING AUTHORITY OF PADUCAH
PHA ANNUAL PLAN
FISCAL YEAR BEGINNING APRIL 1, 2022**

B. Annual Plan Elements

B.1(c) - Deconcentration Policy

It is HAP's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, The HAP will skip families on the waiting list to reach other families with a lower or higher income. The HAP will accomplish this in a uniform and non-discriminating manner.

The HAP 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, the HAP will analyze the income levels of families residing in each of its developments, the income levels of census tracts in which the developments are located, and the income levels of the families on the waiting list. Based on this analysis, the HAP will determine the level of marketing strategies and deconcentration incentives to implement.

The HAP may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration 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.

B.2(a) - New Activities

1. **ROSS Grant Awarded** - The HAP applied for and was awarded the ROSS Grant that began June of 2022.
2. **RAD** - The HAP desires to apply for RAD conversions of AMP's 001 and 002. This will be a learning experience for all staff, along with the community and residents. Will work with a consultant to strategize on how best to go about a RAD conversion.
3. **Demolition/Disposition** - Continuing to work closely with HUD staff and a consultant to dispose of the "orphan units" which continue to hurt our occupancy/vacancy rate. The units were converted to self-sufficiency units many years ago. At the time they were not listed in HAP's ACC count. With the implementation of PIC/IMS, they were brought back into the system. We are currently in discussion with HUD Louisville Staff on how to proceed whether it be a Section 18 Disposition application or follow guidelines on PIH Notice 2011-7.
4. **Occupied Painting** - Ongoing - The HAP secured a contractor to paint units and update the paint scheme to make the units more appealing on the inside by painting the trim white which will break up the bland look of everything being painted the same color. The paint scheme will also be update during the make-ready process.
5. **Tree Trimming** - While this project began in the previous year, this will be an ongoing contract to ensure that all trees at all properties are properly trimmed and safe.
6. **Utility Pole/Service Upgrade** - Continue to work with the local power company to identify any concerns with current power pole service so that any issues can be corrected and eventually have the power company take over maintenance of the power poles.
7. **Occupancy by Police Officers** - The HAP continues to work with our local police department to support security at all sites and offer units to police officers to increase police presence and safety for residents. We are considering offering modernized units to draw the police officers to want to live on HAP property.
8. **Units with Approved Vacancies for Modernization** - Modernize units as they become vacant to improve their appearance by updating the floors to Luxury Vinyl Planking throughout the unit, update the countertops, paint scheme, kitchen, and bathroom cabinets. The following units have been submitted to HUD to undergo modernization:

706 BOYD STREET APT 4
1206 Walter Jetton Apt 1
166 BRIDGE COURT
300 LEGION DR APT 4
205 ELLA DR APT 2

209 LEGION DR APT 2
300 Ella Dr Apt 1
1959 Hendricks St Apt 1
319 N 6TH STREET
728 S 4th ST
323 FOUNTAIN AVE APT1
2316 OHIO #9
715 S 22ND #6
2315 S 25TH #8
2324 Ohio #1
2401 S 25th #6
2809 MARQUESS #4
437 CHERRY #4
2901 MARQUESS 4
444 CHERRY CIRCLE #2

The HAP also has a goal to modernize at least 20 units in each property (KY6-3, KY 6-4, KY6-6, KY6-7, KY6-8, and KY6-9) to help combat the vacancies.

9. **Vacancy Reduction** - Vacancies have become burdensome causing the HAP to become a substandard rated PHA. The HAP is looking at a multitude of options to reduce to include hiring contractors through a pool, possibly use force account labor and RAD conversion(s) and changing the tenant selection plan.
10. **Remove Preferences and Site-Based Waiting Lists** - Leasing of ready to rent units and increasing income has proven difficult due to timeliness of documents being turned in for eligibility for preferences and the lack of working residents has reduced rental income coupled with the COVID-19 pandemic. Our goal will be to move to a single wait list with no preferences by the start of FY2024. Change selection from preference to a lottery which is HUD preferred.
11. **Anderson Court HVAC**
Anderson Court KY006004 heating and cooling systems have reached their end-of-life cycle and need to be replaced.
12. **Dolly McNutt Roofs**
The roofs at Dolly McNutt KY006009 have reached their end-of-life cycle and need to be replaced.

B.5 - Progress Report

1. The current ACOP that was adopted in 2014 has been reviewed by a third party who provided suggestions for a revised ACOP, and the revisions have

been implemented into the document(s). Staff has been trained on the revised ACOP. With the COVID-19 pandemic, the public hearing has been postponed as well as its full implementation. The revised ACOP will be adopted towards the end of 2022 or early 2023.

2. The replacement of the HVAC at Elmwood Court is complete.
3. We will continue to offer units for local police officers. We have not had any want to reside in public housing as of date.
4. The Section 18 Disposition/Demolition application is ongoing. A Environmental Review has been completed and we are awaiting approval before submitting the Section 18 application.
5. Occupied painting has been on-going and will continue as contractor is available.
6. Modernization of vacant units has been delayed due to lack of contractor availability due to the recent tornado's that occurred recently (December 10, 2021) in the area.
7. Anderson Court Water Shutoff's were installed.
8. Utility pole/service upgrades are still in discussion with the local power company.

C.1 - Capital Improvements

See HUD Form 50075.2 approved by HUD on 3/9/2020

Violence Against Women (VAWA) Goals

The Housing Authority of Paducah (HAP) has maintained its definition of "domestic violence" in covering the provisions of VAWA of 2005. AS such, any victims of domestic violence, sexual assault, dating violence and stalking will be granted priority in selection for vacant public housing units. Additionally, HAP maintains an addendum that spells out the VAWA protections granted to victims of domestic violence (i.e., they will not be evicted as victims of domestic violence) who are already residents of HAP. Thus, HAP will offer selections preference to future clients and occupancy protection for current residents who are victims of VAWA actions. Our ACOP currently reflects this as well.

Significant Amendment or Modification

The Housing Authority of Paducah has chosen to use the HUD definition of Significant Amendment or Modification. Specifically, it will consider the following to be such modifications/amendments:

- a. Changes to rent or admission policies or organization of its waiting list
- b. Additions of non-emergency work items (not included in the current Annual Statement of 5-Year Action Plan) or change in use of the replacement reserve funds under the Capital Fund Program costing more than \$100,000
- c. Any change with regard to demolition or disposition, designation of projects/buildings for the elderly/disabled or families with disabilities, homeownership programs or conversion activities.

The Housing Authority of Paducah has chosen the following as its definition of Substantial Deviation from its Annual Plan:

- a. Redirection of more than 25% of its operation budget funds from any budgeted/scheduled activity to another activity
- b. A major change in program direction (e.g., new or different housing selection preference criterion, new or changes to deductions from income-based rents, additional efforts to enhance deconcentration opportunities, changes in the basis of determining ceiling/flat rent amounts, etc.) that requires action on the part of the Board of Commissioners

None of these changes will be considered a Substantial Deviation if those changes result from Government (i.e., Federal, State or Local) actions over which the HAP exercises no control, such as, reduced operating funds.