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.

A. PHA Information.

A.1

PHA Name: Hawaii Public Housing Authority **PHA Code**: HI001, HI901
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2025
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 4,731
Number of Housing Choice Vouchers (HCVs) 4,397
Total Combined Units/Vouchers 9,128
PHA Plan Submission Type: ☐ ☒ Annual Submission ☒ ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The Hawaii Public Housing Authority's (HPHA) Annual PHA Plan and all supporting documents are available online at: https://www.hpha.hawaii.gov/plans-reports.

Hard copies of the Annual PHA Plan will be made available at all Asset Management Project (AMP) offices. Please see **Attachment A** for each AMP office address.

☐ **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 Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	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):

Plan Element I: 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)).

In accordance with 24 CFR 903.7(a)(1) and (2)(i), the sections below describe the housing needs of low-income and very low-income families who reside in Hawaii as well as those who are on the HPHA's public housing and HCV Program waiting lists. Additional information is provided on the specific housing needs of families who are extremely low-income (as required by 24 CFR 903.7(a)(1)(i)), elderly (as required by 24 CFR 903.7(a)(1)(ii)), disabled (as required by 24 CFR 903.7(a)(1)(iii)), and of various races and ethnic groups (as required by 24 CFR 903.7(a)(1)(iii)).

A. Jurisdictional Housing Needs

The data and information contained herein was gathered from the latest Hawaii Housing Planning Study (HHPS) produced in 2019, which was prepared by SMS Research, Inc. on behalf of the Hawaii Housing Finance and Development Corporation (HHFDC), the HPHA, and other state and local agencies; the State of Hawaii Consolidated Plan for PYs 2020-2024; and publicly available data collected by the U.S. Census Bureau's American Community Survey; the Hawaii Department of Business, Economic Development, and Tourism (DBEDT); the National Low Income Housing Coalition; and the Hawaii Appleseed Center for Law & Economic Justice.

According to the U.S. Census Bureau, there were 535,543 housing units in Hawaii in 2017. This number is up 2.0 percent from 524,852 units in 2014. Among the 2017 total, 482,864 housing units were available to the

residential housing market (455,502 were occupied units and 27,362 were available, vacant units). It was estimated that 50,156 additional housing units were needed by 2025. That number included a backlog of approximately 28,459 housing units which were needed to meet the demand in 2017; a projected demand of 18,078 new housing units to accommodate population growth; and 3,619 units to accommodate households experiencing homelessness.

The demand for housing is greatest among families with the lowest income levels, according to the 2019 HHPS. This finding suggests the state's housing market has been more effective at producing high-end versus low-end units. The HHPS states that market inefficiencies are exacerbated during periods of rapid economic expansion when fewer low-end units are built; more middle-market and low-end units are built during periods of market adjustment. The 2019 HHPS also found that the current housing market produces units for sale more efficiently than units for rent.

A.1. Extremely Low-Income Families

As of 2019, roughly 14 percent (roughly 74,976) of housing units were priced affordably[1] for households earning less than 30 percent of the statewide area median income (AMI). Of the 50,156 housing units needed by 2025, about 20 percent or 10,457 units would be needed for extremely low-income families.

In 2021, there were approximately 41,207 renter households that fell below 30 percent of the statewide AMI[2]. According to the HHFDC, the annual income of a 4-person, extremely low-income family on Oahu in 2023 was $39,300[3]. At that same time, the annual income required to afford a two-bedroom rental home at HUD's Fair Market Rent was roughly $87,013[4].

Units Needed for Extremely Low-Income Families by 2025	
Jurisdiction	**Units Needed**
State of Hawaii	10,457
City and County of Honolulu	4,200
County of Maui	1,721
County of Hawaii	3,475
County of Kauai	1,060

Source: HHPS, 2019, pg. 40.

A.2. Elderly Families

The 2019 HHPS defines elderly households as those with one or more persons 60 years of age or older, no children under the age of 18, and no persons other than immediate family. Of the 50,156 new housing units needed by 2025, 13 percent or 6,714 units would be needed for elderly households. This number is up 9 percent from the last HHPS conducted in 2016.

	Units Needed for Elderly Families[5] by 2025 (AMI)			
Jurisdiction	**< 30%**	**30% to 50%**	**50% to 60%**	**60% to 80%**
State of Hawaii	400	751	113	704
City and County of Honolulu	288	714	72	538
County of Maui	62	6	16	21
County of Hawaii	49	22	15	132
County of Kauai	0	9	11	13

Source: HHPS, 2019, pg. 46.

[1] The 2019 HHPS defines a housing unit as affordable if it does not require a monthly mortgage or rent payment greater than 30 percent of monthly household income.
[2] National Low Income Housing Coalition, 2023 Hawaii Housing Profile
[3] HHFDC Income Schedule for 2023
[4] National Low Income Housing Coalition, 2023 Hawaii Housing Profile
[5] Number of units reflects the sum of ownership and rental units needed for each category.

Considering only elderly households, about 29 percent or 1,967 units are needed for low- and moderate-income households making 80 percent of the statewide AMI or less. The demand for single-family versus multi-family units was almost evenly distributed among elderly households. Of the 6,714 needed elderly units, the 2019 HHPS projected a demand for 3,129 (47%) single-family dwellings.

The largest special needs group identified by the 2019 HHPS was the elderly. With only 4.5 percent of seniors residing in a nursing home or senior living facility, there is a significant need for at-home care. For seniors who choose to or must remain in their unit or with family, their homes will require retrofitting with grab bars, ramps, emergency call systems, special telephones for the blind, etc.

A.3. Households with Individuals with Disabilities

Although public housing, Section 8, and similar federal housing assistance programs provide disabled families with greater access to affordable housing, there is still a significant need for additional support and/or treatment services which can be delivered at or near home. According to the 2019 HHPS, about 81,018 of survey respondents stated someone in their household had a "physical, mental, or emotional condition that made it difficult to walk or climb stairs." Roughly 27,575 households included at least one member who had difficulty bathing or dressing themselves. In 42,688 households statewide, at least one member had a physical, mental, or emotional condition that requires assistance with activities of daily living.

The 2019 HHPS found that 26 percent of disabled families were single-person households. Very often, these are people who are frail and elderly, suffering from an advanced terminal illness, or struggling with severe mental or physical disabilities. Without access to a shelter, clinic, or other living arrangement where daily living support and medical treatment can be provided, these households will require in-home care. Additional accessibility retrofitting may also be required.

A.4. Housing Needs by Race & Ethnicity

A 2018 report[6] published by DBEDT's Research and Economic Analysis Division, found that Hawaii ranks 47th among the fifty states and District of Columbia in homeownership rates for occupied housing units. Although homeownership rates were low for all racial groups except Japanese and Okinawan, it was particularly low among those of a younger age. The median age of six of the seven racial groups with homeownership rates under 50% was under 28 years old.

DBEDT's report uses the U.S. Census Bureau's definition of gross rent as "the contract rent plus the estimated cost of utilities and fuels, if… costs are paid for by the renter. It is a measure of average monthly housing cost expenses for renters." DBEDT found that African-Americans and Guamanians or Chamorro had the highest median gross rents, at $1,945 and $1,940, respectively. This was about 16% - over $300 a month – more than the third highest median gross rent, $1,636 paid by Whites. Only Marshallese had a gross rent less than $1,000; however, 92.3% of Marshallese rent rather than own.

Median Gross Rent by Household Rent	
Race Alone or in Combination	**Median Gross Rent**
Total Population	$1,438
White	$1,636
Filipino	$1,313
Japanese	$1,245
Native Hawaiian	$1,252
Chinese	$1,211
Black or African American	$1,945
Korean	$1,299
Samoan	$1,274
American Indian/Alaska Native	$1,441

[6] Demographic, Social, Economic and Housing Characteristics for Selected Race Groups in Hawaii; 2018

Vietnamese	$1,150
Okinawan	$987
Marshallese	$1,054
Guamanian or Chamorro	$1,940
Tongan	$1,175

Source: DBEDT, 2018, pg. 15.

In 2017, HUD's Office of Policy Development published the results of its study on the housing needs of Native Hawaiians[7]. The report compared the housing conditions of Native Hawaiians to those of other residents of Hawaii and examined specific subgroups of Native Hawaiians in the context of federal policy.

HUD found that Native Hawaiians were overrepresented among Hawaii's homeless population. In 2015, Native Hawaiians and Other Pacific Islanders accounted for only 10 percent of the state's population but were 39 percent of the 7,620 people experiencing homelessness in Hawaii. Data from 2016 showed that 42 percent of 7,921 homeless individuals in Hawaii identified as Native Hawaiian or Other Pacific Islander.

The study also provided greater insight into the types of housing Native Hawaiian households need. Large households (i.e., those with five or more members) accounted for 27 percent of Native Hawaiian households statewide and nearly 40 percent of households on the Hawaii Department of Hawaiian Homelands (DHHL) waiting list. Additionally, Native Hawaiian households were more likely to be working and more likely to include children than were non-Native Hawaiian households in Hawaii. According to the report, these findings demonstrate a need for housing that can accommodate larger households and is located close to employment centers and transportation networks.

B. Housing Needs by HPHA Program Waiting List

B.1. Housing Needs of Families on the Public Housing Waiting List

As of September 23, 2024, there are **3,062 families** on the HPHA's federal public housing waiting lists. Their housing needs are broken down as follows:

Income Levels		
Family Type	**# of Families**	**% of Total Families**
Extremely Low-Income (≤ 30% AMI)	2,819	92.06%
Very Low-Income (> 30%, but ≤ 50% AMI)	188	6.14%
Low-Income (> 50%, but ≤ 80% AMI)	55	1.80%
Families with Children	1,554	50.75%
Elderly Families	687	22.44
Families with Disabilities	579	18.91%
Racial Distribution		
Race	**# of Families**	**% of Total Families**
Asian/Pacific Islander/Other	2,497	81.55%
White	859	28.05%
Hispanic	450	14.70%
Black	184	6.01%
American Indian	125	4.08%
Bedrooms Needed		
Unit Size	**# of Families**	**% of Total Families**
1 Bedroom and Studio	1,294	42.26%
2 Bedrooms	1,064	34.75%
3 Bedrooms	563	18.39%

[7] Housing Needs of Native Hawaiians; 2017

4 Bedrooms	126	4.11%
5 Bedrooms	15	0.49%

B.2. Housing Needs of Families on the Housing Choice Voucher (HCV) Waiting List

As of September 23, 2024, there are **1,981 families** on the HPHA's HCV waiting list. Their housing needs are broken down as follows:

Income Levels		
Family Type	**# of Families**	**% of Total Families**
Extremely Low-Income (≤ 30% AMI)	1,709	86.27%
Very Low-Income (> 30%, but ≤ 50% AMI)	205	10.35%
Low-Income (> 50%, but ≤ 80% AMI)	67	3.38%
Families with Children	850	42.91%
Elderly Families	284	14.34%
Families with Disabilities	682	34.43%
Racial Distribution		
Race	**# of Families**	**% of Total Families**
Asian/Pacific Islander/Other	1,017	62.39%
White	439	17.58%
Hispanic	277	11.09%
Black	261	10.45%
American Indian	46	1.84%
Bedrooms Needed		
Unit Size	**# of Families**	**% of Total Families**
1 Bedroom and Studio	1,014	51.19%
2 Bedrooms	416	21.00%
3 Bedrooms	430	21.71%
4 Bedrooms	85	4.29%
5 Bedrooms	34	1.72%
6 Bedrooms or more	2	0.10%

C. Strategies for Addressing Housing Needs

In accordance with 24 CFR 903.7(a)(2)(ii), this section provides a brief description of the strategies the HPHA employs to address the housing needs identified above.

The overwhelming majority of housing assistance the HPHA provides through its public housing and voucher programs already targets families at or below 30% to 50% of the AMI, elderly families, and disabled families.

The HPHA always maximized the number of affordable public units it can offer to low-income households given its current resources. Through Capital Fund Program appropriations and asset preservation strategies, the HPHA has planned for $27 million in capital work over the five-year period of FY 23 to FY 27. Given the average age of the agency's housing inventory is over 50 years old, projects which address health and safety issues, site improvements, ADA compliance, structural repairs, and general infrastructure upgrades are prioritized. Aging properties and reductions in funding levels have made asset preservation an increasingly difficult challenge.

In 2022, the HPHA became a Moving to Work (MTW) expansion agency as part of the Landlord Incentives Cohort. The HPHA's participation in MTW will allow it to simplify and streamline the operation of core programs for the purposes of accomplishing the three statutory objectives of MTW. Specific strategies to increase the cost-effectiveness of federal programs, improve participant self-sufficiency, and expand affordable housing choice locally are outlined in the HPHA's MTW Supplements.

The HPHA is also seeking innovative approaches in redeveloping aging and obsolete properties through public-private partnerships. All of the agency's redevelopment projects seek to create mixed-income, mixed-use neighborhoods which make greater use of valuable State land assets through higher density. The HPHA intends to use mixed-finance strategies and federal programs like Rental Assistance Demonstration (RAD) in accomplish this goal.

In 2023, the HPHA launched its Ka Lei Momi Program to redevelop 10 low-income public housing projects identified in its portfolio. Most of these projects are located near planned stations of the Honolulu light rail system currently being developed by the Honolulu Authority for Rapid Transportation. The redevelopment of these projects will involve the rehabilitation of functionally obsolete public housing units as well as a significantly expansion of the State's affordable housing inventory.

Plan Element 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))

A. Public Housing Deconcentration Policy

In accordance with 24 CFR §903.7(b)(1), a copy of the HPHA's public housing deconcentration policy is attached as **Attachment B: Deconcentration Policy**.

B. HCV Program Policies

In accordance with 24 CFR §903.7(b), this section briefly describes the HPHA's policies governing tenant eligibility, selection, admission, and occupancy for the HCV Program.

B.1. HCV Eligibility Policies

The HPHA's HCV tenant eligibility policies are established under Section 17-2031-22, Hawaii Administrative Rules (HAR). The HPHA requires that an applicant family meet the following eligibility criteria:

- Meet the definition of a "family" as set forth in Section 17-2031-3, HAR;
- Be within the appropriate income limits;
- Not have any outstanding debt owed to the HPHA;
- Not have been previously terminated from any other program operated by the HPHA for drug-related, criminal, or violent behavior;
- Be a citizen or a non-citizen with eligible immigration status; and
- Furnish and verify valid Social Security numbers for all members who claim eligible immigration or citizenship status.

Additional information on the HCV Program's eligibility requirements can be found in Chapter 3 of the Administrative Plan.

B.2. HCV Selection & Admission Policies

The HCV local preferences for admission are established under Section 17-2031-25, HAR. The current HCV local preferences include:

- Families who experienced homelessness within the twelve months preceding application for the program.

The HPHA's HCV Program also allows for the immediate award of a voucher to families with special preferences. A special preference is given to:

- A public housing family is involuntarily displaced for reasons such as for relocation due to modernization activity, or based on an emergency where conditions of the public housing dwelling unit, building, or project pose an immediate, verifiable threat to life, health or safety of the family, and the family cannot be relocated to another public housing unit in the same program, meeting their needs;
- A public housing family was approved for a transfer as a reasonable accommodation to a dwelling unit with special accessibility features, but the HPHA does not have an appropriate dwelling unit within its inventory that meets the family's needs, and the family has waited over one year;
- A public housing family includes one or more members who are victims of domestic violence, dating violence, sexual assault, stalking, reprisal, or a hate crime and who cannot be transferred safely to another public housing unit;
- A public housing family is under-housed, and the HPHA does not have an appropriately sized public housing dwelling unit currently available or within its inventory; and
- A family that was previously issued a Special Purpose Voucher and experienced a loss of rental assistance because of insufficient funding or a previously eligible family member exceeded the maximum allowable age under the applicable special purpose voucher.

Additional information on the HPHA's HCV selection and admission process can be found in Chapter 4 of the Administrative Plan.

B.3. HCV Occupancy Policies

The HCV Program's occupancy policies are established under Section 17-2031-8, HAR. When determining the appropriate family unit voucher size. The HPHA assigns one bedroom for each two persons within a household except in the following circumstances:

- Persons of the opposite sex (other than spouses and/or significant others) will be allocated separate bedrooms; and
- Live-in aides will be allocated a separate bedroom.

The HPHA utilizes the following occupancy guidelines when determining the appropriate voucher size for a family:

Voucher Size	Persons in Household (Minimum – Maximum)
0 Bedroom, Studio	1 – 1
1 Bedroom	1* - 2
2 Bedrooms	2 – 4
3 Bedrooms	3 – 6
4 Bedrooms	4 – 8
5 Bedrooms	6 - 10

*Single person families are allocated a one-bedroom voucher only when there are no 0 bedroom/studio bedroom dwellings available in an area.

All HCV-assisted units must meet HQS/NSPIRE standards and adhere to the prevailing county's building code.

Additional information on the HCV program's occupancy standards can be found in Chapter 5, Part II of the Administrative Plan.

C. Public Housing Program Policies

In accordance with 24 CFR §903.7(b), this section briefly describes the HPHA's policies governing tenant eligibility, selection, admission, and occupancy for public housing. The requirements listed under 24 CFR §903.7(2)(v) do not apply because the HPHA does not administer any site-based waiting lists.

C.1. Public Housing Eligibility Policies

The HPHA's public housing tenant eligibility policies are established under Section 17-2028-22, HAR. The HPHA requires that an applicant family meet the following eligibility criteria:

- Meet the definition of a family as set forth in Section 17-2028-2, HAR;
- Be within the appropriate income limits;
- Not have any outstanding debt owed to the HPHA;
- Not have been previously terminated from any other program operated by the HPHA for reasons of drug-related, criminal, or violent behavior;
- Be a citizen or non-citizen with eligible immigration status; and
- Furnish and verify valid Social Security numbers for all members who claim eligible immigration or citizenship status.

Additional information on the public housing eligibility requirements can be found in Chapter 2 of the Admissions and Continued Occupancy Policy (ACOP).

C.2. Public Housing Selection & Admission Policies

The public housing local preferences for admission are established under Section 17-2028-34, HAR. Each of the following local preference categories is weighted equally:

- Families who are involuntarily displaced;
- Victims of domestic violence who are participating in a program with case management through a domestic violence shelter, program, or clearinghouse; or
- Homeless persons who are participating in a federally or state funded homeless transitional shelter or program, and who are in compliance with a social service plan.

Single applicants who are elderly, disabled, or displaced are given preference over all other single applicants, regardless of the other single applicant's local preference.

The HPHA maintains fourteen geographical waiting lists which are community wide in scope and consist of all eligible applicants. The geographical waiting lists are grouped by county: City & County of Honolulu (4), County of Hawaii (6), County of Maui (2), and County of Kauai (2).

Once admission preferences are applied, families are selected from a waiting list by a randomly assigned lottery number.

Additional information on the public housing selection and admission process can be found in Chapter 4 of the ACOP.

C.3. Public Housing Occupancy Policies

The public housing occupancy policies are established under Sections 17-2028-5 and 17-2028-6, HAR.

The HPHA does not determine who shares a bedroom but requires that there be at least one person per bedroom. All determinations of unit size are made in a manner consistent with Fair Housing guidelines. One bedroom is generally assigned for every two family members. The HPHA considers factors such as family characteristics

(e.g., members' sex, age, relationship), number of bedrooms, size of sleeping areas, and the overall size of the unit. Consideration is also given for medical reasons and the presence of a live-in aide.

The HPHA utilizes the following occupancy guidelines when determining the appropriate dwelling unit size for a family:

Unit Size	Persons in Household (Minimum – Maximum)
0 Bedroom, Studio	1 – 1
1 Bedroom	1 - 2
2 Bedrooms	2 – 4
3 Bedrooms	3 – 6
4 Bedrooms	4 – 8
5 Bedrooms	6 - 10

The HPHA has dwelling units designed for persons with mobility, sight, and hearing impairments. These dwelling units were designed and constructed specifically to meet the needs of persons requiring the use of wheelchairs or other accessibility modifications.

Priority for occupancy is given to families with disabled members who require the accessibility features provided in the units. No non-mobility-impaired families are offered these units until all eligible mobility impaired applicants have been considered. All non-mobility-impaired families who are offered an accessible unit must accept a transfer to a non-accessible unit at a later date if a person with a mobility impairment requires the unit.

For additional information on the public housing program's occupancy policies, please see in Chapter 5 of the ACOP.

Plan Element II: Recent Revision(s)

B. HCV Program Policies

B.2. HCV Selection & Admission Policies

☒ The HPHA amended Chapter 17-2031, HAR, and the Administrative Plan to simplify the local preferences policy. The HPHA eliminated the use of "priority groups" and kept one local preference for families experiencing or at risk of homelessness. (Added in FY 25, Completed in FY 25)

☒ The HPHA amended Chapter 17-2031, HAR, and the Administrative Plan to establish the special preferences policy in the HCV Program. (Added in FY 25, Completed in FY 25)

B.3. HCV Occupancy Policies

☒ The HPHA amended Chapter 17-2031, HAR, and the Administrative Plan to permit biennial reexaminations for HCV families (MTW Activity 3.b.). (Added in FY 25, Completed in FY 25)

Plan Element II: Proposed Revision(s)

B. HCV Program Policies

B.1. HCV Eligibility Policies

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to require applicants with a criminal history to include their latest conviction date or arrest date.

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to clarify that the HPHA will send all termination letters via certified mail. (Added in FY 26)

B.2. HCV Selection & Admission Policies

☐ Regarding the HCV Program's local preference for persons experiencing homelessness, amend Chapter 17-2031, HAR, and the Administrative Plan to:

- Establish the definition of "homelessness" as the lack of a fixed, regular, and adequate nighttime residence (i.e., having a primary nighttime residence that is a supervised public or private shelter providing temporary accommodations, including welfare hotels, congregate shelters, non-congregate shelters, and transitional housing, or an institution providing temporary residence for individuals intended to be institutionalized, or a public or private place not ordinarily used as a sleeping accommodation for human beings); and
- Revise the local preference to include persons who are experiencing or who have experienced homelessness within the twelve months preceding the application date, and who are in compliance with a housing or service plan as certified by (1) a case manager or other employee of a social services provider or nonprofit organization which receives federal or State funding, or (2) a State or county agency which administers social services programs. (Added in FY 25, Revised in FY 26)

☐ Amend Chapter 17-2031, HAR, and Chapter 17 of the Administrative Plan to:

- Indicate that an owner-maintained waiting list will be utilized for PBV- and/or RAD PBV-assisted units at the Towers at Kuhio Park;
- Adopt approval policies and oversight procedures for owner-maintained waiting lists for PBV projects as required under 24 C.F.R. 983.251(c)(7); and
- Incorporate any owner-submitted waiting list management policies upon approval by the HPHA. (Added in FY 26)

B.3. HCV Occupancy Policies

☐ Amend §17-2031-33, HAR, and 11-II.B. of the Administrative Plan to adopt a policy regarding adult family members who leave or are removed from a household only to request to rejoin the household at a later date. In such cases, the HPHA shall prohibit the adult from rejoining the household. If determined necessary as a reasonable accommodation, the adult may rejoin the household as a live-in aide. (Revised in FY 26)

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to prohibit all adult additions to a household except for:

- The spouse or domestic partner of an adult household member; or
- The elderly and/or disabled parent of a household member. (Added in FY 26)

☐ Amend Chapter 17-2031, HAR, and Chapter 17 of the Administrative Plan to:

- Clarify that the HPHA shall manage separate waiting lists for each PBV-assisted project;
- Specify that families on the tenant-based waiting list shall be offered the opportunity to be placed on the waiting list for PBV assistance;
- Specify that the HPHA may use the tenant-based waiting list to fill a vacant PBV-assisted dwelling unit if there are no families on the associated PBV waiting list for whom it would be appropriate to house in the vacant unit; and

- Adopt Part X of Chapter 17 of the Administrative Plan regarding the Rental Assistance Demonstration Program as its own Chapter. (Added in FY 26)

☐ Adopt a policy to shorten the length of time a family can be absent from a subsidized unit from 180 days to 60 days, allowing for specific exceptions as allowed under the 24 CFR §982.312(a).

☐ Adopt a policy to prohibit an owner from keeping a Housing Assistance Payment for the remainder of the month when a family moves out of the unit. Under this policy, Housing Assistance Payments will end the date the family vacated the unit, as determined by the HPHA. Additionally, any amount overpaid to the owner must be returned to the HPHA.

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to include various discretionary policies regarding Special Purpose Vouchers (SPV), including conversion of an SPV to a tenant-based HCV when a qualifying household member no longer needs or qualifies for the SPV. (Revised in FY 26)

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to implement Hawaii Revised Statutes §356D-13.5. Under this amendment, the HPHA would allow only the original household members at the time of voucher issuance to retain the voucher when other members of the family leave the unit. The voucher would also be automatically returned to the HPHA once all original household members are no longer in the household. The HPHA would provide an exception for families where the original parents in the household are survived by minors who were subsequently added to the household, until the youngest minor reaches the age of 21 years or reaches the age of 23 if the youngest minor is a full-time student at a business school, technical school, college, community college, or university.

☐ Amend Chapter 17-2031, HAR, and the Administrative Plan to state that when a family's composition is reduced, except for instances in which the reduction is due to fraud, misinformation, or inaccurate documentation, a voucher correction will occur at the end of the lease or the next recertification, whichever comes first. (Revised in FY 25)

C. Public Housing Program Policies

C.2. Public Housing Selection & Admission Policies

☐ Amend Chapter 17-2028, HAR, and the ACOP to align the local preference policy with Act 99, Session Laws of Hawaii 2023, which repealed the percentage requirements related to the admission of applicants with or without preferences into federal and state low-income public housing projects. (Added in FY 25)

☐ Amend §17-2028-34(c), HAR, to remove the following preference from the public housing program's selection and admission policy: "A single applicant who is elderly, disabled, or displaced shall be given preference over all other single applicants, regardless of the other single applicant's local preference."

☐ Amend §17-2028-39(d)(4), HAR, to eliminate as an example of "good cause" refusal of a dwelling unit offer the existence of a rental agreement that cannot be breached without causing undue financial hardship, as verified by an applicant's current landlord, and "the applicant's acceptance of the offer would result in undue hardship not related to consideration of race, color, national origin, or language and the applicant presents evidence which substantiates this to the authority's satisfaction."

C.3. Public Housing Occupancy Policies

☐ Adopt biennial recertifications for public housing families. The HPHA received MTW Waiver 3.a. as part of its MTW Supplement for FY 25. (Added in FY 25)

☐ Adopt a policy to not renew a lease agreement if a family or family member remains non-compliant with the Community Service and Self-Sufficiency Requirements after entering into a 12-month written agreement with the Authority to cure such noncompliance. (Revised in FY 25)

☐ Create a "schedule of charges" policy by having the maintenance work-order system record the actual cost of materials and time spent by maintenance workers to charge tenants the actual cost of intentional, careless, or negligent damages beyond normal wear and tear.

Plan Element III: 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))

	Sources	Anticipated Financial Resources for HPHA FY 26	Planned Uses
Federal Grants	Public Housing Operating Fund*	$36,190,000	Operations and maintenance of public housing
	Public Housing Capital Fund*	$15,347,000	Capital repairs, management improvements, operations, administrative costs
	Section 8 Tenant-Based Assistance*	$67,127,000	Housing Assistance Payments and Administrative costs
	Family Self Sufficiency Program	$90,000	FSS Coordinator expenses
	Public Housing Dwelling Rental Income	$25,389,000	Operations and maintenance of public housing
	State Capital Improvement Program	$25,800,000	Capital repairs and associated administrative costs
	State General Fund	$17,525,000	Operations, State Rent Supplement Program, maintenance, security, and vacant unit turnaround of public housing
	Total Resources for Public Housing or Tenant-Based Assistance	**$187,468,000**	*MTW funding fungibility applies (i.e., collectively referred to as "MTW Funds").
	Other Project-Based Resources: Performance Based Contract Administration	$50,292,000	PBCA payments to landlords; administrative costs
	Public Housing Non-Rental Income – including	$386,000	Management improvements, operations for site location

Rooftop Lease Agreements		

Plan Element IV: 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))

A. HCV Rent Determination Policies

The HPHA reviews and adjusts its payment standards with each HUD update to the Small Area Fair Market Rents (SAFMR). To establish its payment standards, all the zip codes for the island of Oahu are grouped into 9 different tiers. All zip codes within a particular tier share the same payment standards. As an approved MTW activity under MTW Waiver 2.a., the HPHA may set its payment standard between 90% to 120% of the applicable SAFMR. Other factors the HPHA considers when establishing each tier and their payment standard amounts include the configuration of existing neighborhoods, unit availability, rent burden, access to low-poverty areas, potential budget impacts, and the complexity of implementation.

Whenever a dwelling unit is identified by a voucher holder, the HPHA will perform a test of rent reasonableness on the unit to ensure the rent charged is reasonable and comparable to those of similar unassisted units on the marketplace.

Payment Standards Based on SAFMR
Effective January 1, 2025

Tier	ZIP Code	0BD	1BD	2BD	3BD	4BD	5BD	6BD	7BD	8BD
1	96825	$2,830	$3,080	$4,030	$5,650	$6,770	$7,786	$8,801	$9,817	$10,832
2	96734	$2,530	$2,750	$3,603	$5,050	$6,050	$6,958	$7,865	$8,773	$9,680
	96821									
	96818									
3	96706	$2,210	$2,403	$3,145	$4,405	$5,283	$6,075	$6,867	$7,660	$8,452
	96707									
	96815									
	96762									
4	96786	$2,120	$2,300	$3,015	$4,225	$5,060	$5,819	$6,578	$7,337	$8,096
	96791									
5	96759	$1,975	$2,147	$2,812	$3,942	$4,720	$5,428	$6,136	$6,844	$7,552
	96744									
	96717									
	96782									

	96814									
	96789									
6	96712	$1,796	$1,950	$2,556	$3,582	$4,292	$4,936	$5,580	$6,223	$6,867
	96701									
	96822									
	96816									
	96826									
7	96797	$1,670	$1,817	$2,380	$3,337	$3,997	$4,596	$5,196	$5,795	$6,395
	96731									
	96813									
8	96792	$1,640	$1,780	$2,330	$3,265	$3,910	$4,497	$5,083	$5,670	$6,256
	96819									
9	96817	$1,480	$1,610	$2,107	$2,950	$3,540	$4,071	$4,602	$5,133	$5,664
	96730									
	96795									

Income and Total Tenant Payment (TTP) are calculated in accordance with 24 CFR Part 5, Subpart F. The TTP is the greatest of the following amounts:

- 30% of the family's monthly adjusted income;
- 10% of the family's gross monthly income; or
- The minimum rent of $0.

Financial hardship rules do not apply because the HPHA established a minimum rent of $0. The HPHA does not apply a welfare rent policy.

For more information on calculating the family share of rent, please see Chapter 6 of the Administrative Plan. For more information on the rent reasonableness procedures, please see Chapter 8 of the Administrative Plan. For more information on the HPHA's regular and interim reexaminations policies, please see Chapter 12 of the Administrative Plan. For more information on the HPHA's payment standards policies, please see Chapter 16 of the Administrative Plan.

B. Public Housing Rent Determination Policies

Income and TTP for all public housing families are calculated in accordance with 24 CFR Part 5, Subpart F. Tenants may choose to pay either:

- **Income-based rent**: The income-based rent is based on a tenant's income and the HPHA's rent policies for determining such rents. Under an income-based rent, the monthly rental rate may be adjusted after the tenant's reexamination, when the tenant's family composition changes, or if a verification of income causes a change in rent. If the tenant chooses to pay an income-based rent, the TTP shall be set at the greatest of:
    - 30% of the family's adjusted monthly income;
    - 10% of the family's monthly income; or
    - The minimum rent of $50.

OR

- **Flat rent**: The flat rent is based on the market rent charged for comparable units in the private unassisted rental market. It is equal to the estimated rent for which the HPHA could promptly rent the dwelling unit after preparation for occupancy (i.e., fair market rents as determined by HUD). Under this choice, there will be no rent adjustments unless due to financial hardship the tenant may choose to be switched to an income-based rent. The tenant may only choose a flat rent at regular reexamination.

The HPHA will grant a tenant an exemption from payment of minimum rent because of a financial hardship attributable to:

- A loss of eligibility or a pending eligibility determination for a federal, state, or local assistance program, except when the loss of eligibility is a result of sanctions imposed by the welfare agency for noncompliance with program requirements or fraud in connection with the program;
- The tenant would be evicted because they are unable to pay the minimum rent, except when the inability to pay the minimum rent is a result of sanctions imposed by the welfare agency for noncompliance with program requirements or fraud in connection with the program;
- The family's income has decreased because of changed circumstances, including the loss of employment;
- A death in the family; or
- Other circumstances as determined by the HPHA or HUD.

The HPHA will suspend the minimum rent requirement beginning the month following a family's request for a hardship exemption, until it determines whether there is a qualifying hardship and whether the hardship is temporary or long-term:

- If the HPHA determines that qualifying hardship is temporary, it will reinstate the minimum rent from the beginning of the suspension of the minimum rent 90 days after receiving the exemption request. A reasonable payment arrangement will be offered to ensure payment in full of any back charges.
- If the HPHA determines a qualifying hardship is long-term, the family will be exempt from minimum rent requirements if the hardship continues. The extension will apply from the beginning of the month following the family's request for a hardship exemption until the end of the hardship.
- If the HPHA determines there is no qualifying hardship, it will reinstate the minimum rent, including ack rent owed from the beginning of the suspension. The tenant would be responsible for back charges within 90 days of the date of notification that no qualifying hardship was found.

For more information regarding the HPHA's public housing rent determination policies, please see Chapter 6 of the HPHA's ACOP.

The over-income limits are found in Chapter 11 of the ACOP and updated on an annual basis, in accordance with Notices PIH 2019-11 and PIH 2023-03.

Plan Element IV: Recent Revision(s)

A. HCV Rent Determination Policies

☒ The HPHA received HUD approval of MTW Waiver 2.a. to allow for the setting the payment standard for a zip code between 90% to 120% of the SAFMR. (Added in FY 25)

☒ The HPHA collaborated with the City Department of Community Services, Community Assistance Division, which operates the HCV Program for the City and County of Honolulu, to create matching payment standard schedules for CY 2025. The matching schedules are meant to (1) eliminate confusion among landlords and tenants regarding differing payment standard amounts for vouchers which serve the same zip codes, and (2) prevent landlords from shifting participation to whichever agency has the higher payment standard amounts. (Added in FY 26)

Plan Element IV: Proposed Revision(s)

A. HCV Rent Determination Policies

☐ Adopt policies to clarify how the HPHA will manage two assisted households who share equal custody of a minor (e.g., determining which household the minor's unearned income will be associated with, determining appropriate unit sizes, determining eligible deductions). (Revised in FY 26)

☐ Update the policy for determining the value of a checking account to be consistent with the policy for determining the value of a savings account (i.e., the HPHA will use the current account balance). The purpose of this proposal is to reduce administrative burden.

☐ Update the Administrative Plan to change the minimum rent amount from $0 to $50. The purpose of this proposal is to align the Administrative Plan with the more recently updated Chapter 17-2031 which sets the minimum rent amount at $50.

☐ Adopt a policy to hold harmless a family in an affected payment standard tier for the difference in gross rent if there is a drop in the tier's payment standard resulting in the gross rent exceeding the payment standard.

☐ Adopt discretionary and non-discretionary policies set forth under Sections 102 and 104 of the Housing Through Modernization Act of 2016 (HOTMA) by the compliance deadline to be specified by HUD. (Added in FY 25, Revised in FY 26)

☐ Amend the rent reasonableness procedures described in Chapter 8 of the Administrative Plan as follows:

- Specify that the HPHA may use market rental data collected by the RentWatch software through AffordableHousing.com when performing rent reasonableness determinations;
- Specify that the asking rent of a subject unit proposed for HCV assistance will be compared to the asking rents of comparable units in the same market area, subject to any adjustments made due to differing comparability factors (e.g., square footage, amenities, maintenance services, etc.);
- Remove the requirement that two of the unassisted, comparable units have gross rents greater than that of the subject unit;
- Remove the requirement that one of the unassisted, comparable units have a gross rent lesser than that of the subject unit;
- Specify that the HPHA will generally search for comparable units within a one-half mile radius of the subject property. If there are no comparable units within the one-half mile radius, the HPHA may select for units within a one-mile radius or greater if it determines that such units are in a neighborhood that is essentially similar;
- Specify that the asking rent of the subject unit will be considered reasonable if it is less than or equal to the average of the adjusted asking rents of the comparable units; and
- Require that the owner of the subject unit submit a request to redetermine the reasonable rent amount within ten calendar days following notification that the proposed contract rent is unreasonable. The owner may provide information on no more than three other comparable units. The owner must provide this information within five calendar days of the HPHA's request for such information or the owner's request to contest the determination. If the HPHA determines the owner-provided information is accurate, the HPHA will include the owner-provided information in its calculation of the reasonable rent amount. (Added in FY 26)

☐ Adopt streamlined income determinations for family members with a fixed source of income as described in Attachment D of Notice PIH 2016-05 (HA). (Added in FY 26)

☐ Adopt a $100 minimum rent for all non-disabled, non-elderly families. The HPHA is requesting HUD approval of MTW Waiver 1.f. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 26)

☐ Eliminate utility reimbursement payments when the utility allowance exceeds a family's total tenant payment calculation. The HPHA is requesting HUD approval of MTW Waiver 1.n. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 25)

B. Public Housing Rent Determination Policies

☐ Adopt rules to clarify how rent calculations are to be performed when a tenant enters public housing by way of a citizen sponsorship. If the tenant does not have any source of income, their rent amount will be calculated using the income of their sponsor.

☐ Adopt discretionary and non-discretionary policies set forth under Sections 102 and 104 of HOTMA by the compliance deadline to be specified by HUD. (Added in FY 25, Revised in FY 26)

☐ Adopt a $100 minimum rent for all non-disabled, non-elderly families. The HPHA is requesting HUD approval of MTW Waiver 1.e. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 26)

☐ Eliminate utility reimbursement payments when the utility allowance exceeds a family's total tenant payment calculation. The HPHA is requesting HUD approval of MTW Waiver 1.m. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 25)

Plan Element V: 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))

A. Maintenance and Management Policies

In accordance with 24 CFR §903.7(e)(1), this section lists the rules, standards, and polices governing the management of housing owned, assisted, or operated by the HPHA.

The rules, standards, and policies governing the maintenance and management of housing assisted under the Federal Low-Income Public Housing Program are set forth in:

- Parts I, II, and IV of Chapter 356D, Hawaii Revised Statutes;
- Chapter 17-2028, Hawaii Administrative Rules, "Federally Assisted Public Housing Projects";
- The Admission and Continued Occupancy Policy; and
- The PMMSB Maintenance Policies and Procedures Manual.

The rules, standards, and policies governing the maintenance and management of housing assisted through the Project-Based Voucher Program and Rental Assistance Demonstration Program include:

- Part I of Chapter 356D, Hawaii Revised Statues;
- Chapter 17-2033, Hawaii Administrative Rules, "Section 8 – Housing Choice Voucher and Project-Based Voucher Program"; and

- The Administrative Plan.

B. Pest Management

In accordance with 24 CFR §903.7(e)(2), this section provides a brief description of the HPHA's standard procedures for preventing and eradicating pest infestations in public housing.

The HPHA practices integrated pest management strategies at all public housing properties as recommended in Notice PIH 2007-12 and the HUD Public Housing Maintenance Guidebook VII. The HPHA makes every effort to provide public housing residents with pest-free living environments.

Upon discovery or notification of a pest infestation, HPHA staff will identify the type of pest and determine the scope of the problem. A management office or maintenance staff person will respond to tenant complaints within 24 hours to schedule an inspection. Inspections are scheduled as soon as possible. After an inspection of a reported pest infestation, the HPHA will put a treatment plan in place for the affected unit(s). The project management office may utilize a pest control contractor depending on the scope of the problem.

The HPHA considers the following factors when evaluating and determining the necessary control measures:

- Extent of the problem;
- Available treatments, both natural and chemical;
- Previous treatment efforts;
- Costs of treatment;
- Time involved in treatment; and
- Risks to residents, structures, and grounds.

Resident cooperation is also essential to managing and preventing pest infestations. All public housing residents are made aware of the HPHA's pest control policies upon admission into the program. Regular reminders are also sent through the monthly rent inserts about recommended housekeeping practices (e.g., store food in tight containers in the refrigerator; spills should be wiped up; avoid stacks of newspapers, boxes, etc. which can provide food and shelter for rodents and cockroaches).

Housekeeping practices that result in providing food, shelter, or breeding grounds for pest of any nature must be brought to the attention of a project's management office upon observation by HPHA staff. Tenants whose housekeeping practices include excessive stacked or stored materials, dirty dishes and dirty kitchen cabinets or appliances, or food particles on floors will be advised that their dwelling units may require additional inspections. If such condition(s) are not corrected after multiple inspections, a tenant is at risk of violating their rental agreement. Preventing access to a dwelling unit for a pest inspection also constitutes a rental agreement violation.

C. Management Organization and Programs Administered

In accordance with 24 CFR §903.7(e)(3) and (4), this section briefly describes the management organization of the HPHA and includes a list of all federally and state funded services and programs administered by the agency.

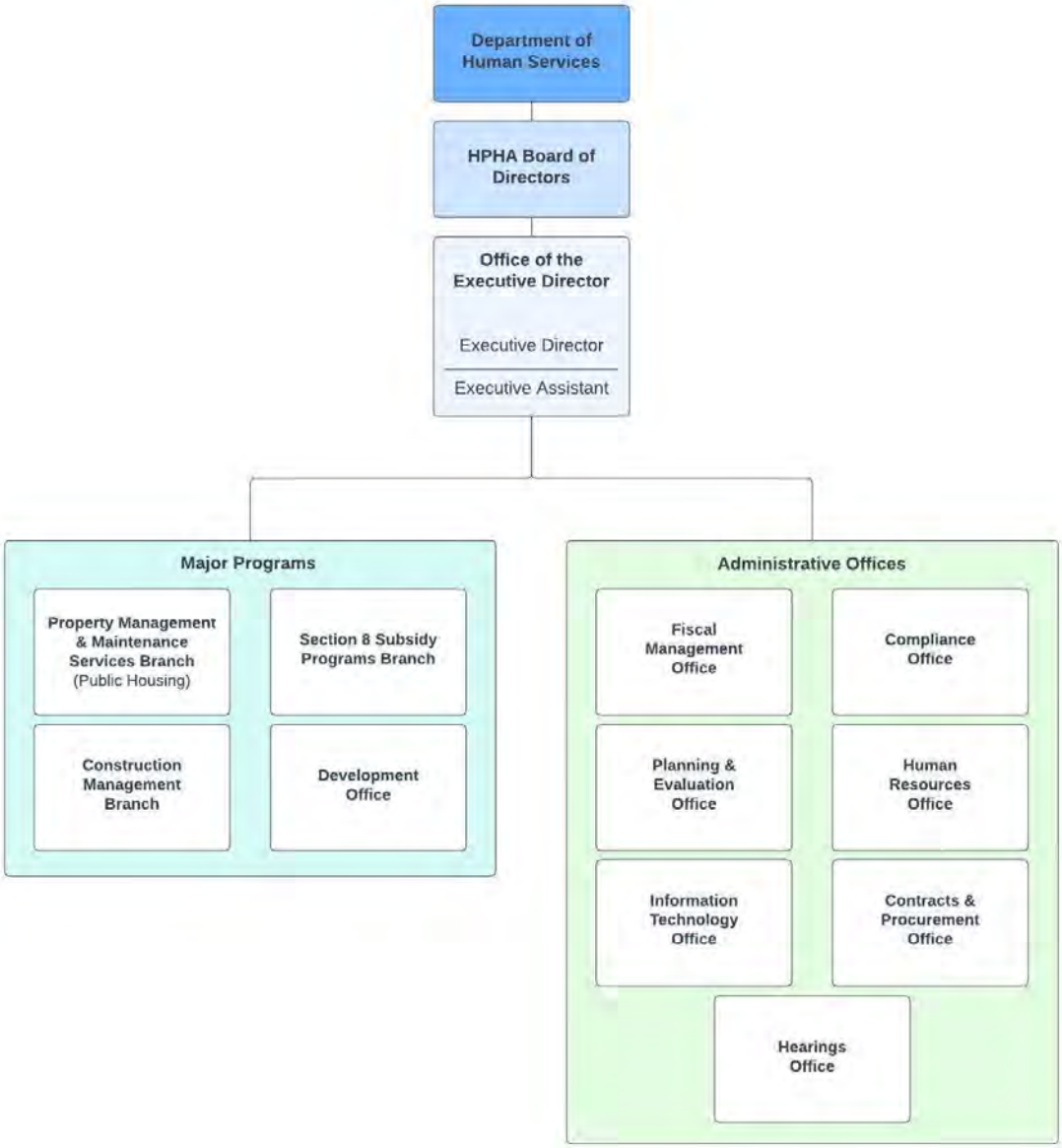
C.1. HPHA Organizational Chart

The HPHA is administratively attached to the Hawaii Department of Human Services. It is governed by an eleven-member Board of Directors which sets forth the policies and direction for the agency as well as approves its programs and actions. The HPHA is comprised of the Office of the Executive Director, which provides for the overall administration and management of agency functions, as well as four major program branches and seven administrative offices.

Property Management and Maintenance Services Branch Major Programs
• Federal Low-Income Public Housing • State Low-Income Public Housing

Section 8 Subsidy Programs Branch Major Programs

• Tenant-Based Voucher (TBV) Programs, including:
  • Housing Choice Vouchers (HCV)
  • Non-Elderly Disabled (NED) Vouchers
  • Veterans Affairs Supportive Housing (VASH) Vouchers
  • Foster Youth Initiative (FYI) Vouchers
  • Emergency Housing Vouchers (EHV)
• Project-Based Voucher (PBV) Program
• State Rent Supplement Program (RSP)
• Family Self-Sufficiency (FSS) Program
• Landlord Incentive Program



Plan Element V: Recent Revision(s)

N/A.

Plan Element V: Proposed Revision(s)

N/A.

Plan Element VI: 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))

In accordance with 24 CFR §903.7(f), the sections below provide a description of the public housing program's grievance procedures and the HCV program's informal review and hearing procedures. Tenants and applicants may avail themselves of these procedures if the HPHA's action or inaction in any way causes them to be adversely affected in a discriminatory way. For more information on these procedures, please refer to Chapters 17-2021 and 17-2028, HAR; Chapter 13 of the ACOP; and Chapter 16 of the Administrative Plan.

A. Public Housing Grievance Procedures

The Public Housing Grievance Procedures apply to all individual grievances except any grievance concerning a termination of tenancy or eviction that involves:

- Any activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other tenants or HPHA staff; or
- Any drug-related criminal activity.

Grievances may be presented orally or in writing to the HPHA's main administrative office or the Property Management and Maintenance Services Branch. Written grievances must be signed by the complainant. The grievance must be presented within a reasonable time not past the first working day after the day of the action or failure to act which is the basis for the grievance. The grievance may be simply stated, but shall specify:

- The grounds upon which it is based;
- The action requested; and
- The name address and telephone number of the complainant, and similar information about the complainant's representative, if any.

An informal conference shall be held to discuss and attempt to resolve the grievance without the necessity of a formal hearing. Within seven (7) business days after the informal conference, a summary of the discussion will be given to the complainant by an HPHA representative. If the complainant is dissatisfied with the proposed disposition of the informal conference, they may submit a written request for a grievance hearing within 15 business days of receipt of the summary.

The grievance hearing shall be conducted by an impartial person or persons appointed by the HPHA other than the person who's action or inaction is under review, or a subordinate of such person. The grievance hearing shall be scheduled by the hearing officer within 28 business days following receipt of the hearing request and at a time and place reasonably convenient to the complainant and the HPHA.

The complainant shall be afforded a fair hearing and shall be provided the basic safeguards of due process, including:

- The opportunity to examine and to copy before the hearing, at the expense of the complainant, all documents, records, and regulations of the HPHA that are relevant to the hearing with at least a 24-hour notice to the legal department prior to the hearing. Any document not so made available after request by the complainant may not be relied upon by the HPHA at the hearing.
- The HPHA shall also have an opportunity to examine and to copy, at the expense of the HPHA, all documents, records, and statements that the family plans to submit during the hearing to refute the HPHA's action or inaction. Any documents not so made available to the HPHA may not be relied upon by the complainant at the hearing.
- The right to a private hearing unless otherwise requested by the complainant.
- The right to be represented by counsel or another person chosen as a representative.
- The right to present evidence and arguments in support of the complaint, to controvert evidence presented by the HPHA, and to confront and cross-examine all witnesses upon whose testimony or information the HPHA relies, limited to the issues for which the complainant has received the opportunity for a formal hearing.
- The right to a decision based solely and exclusively upon the facts presented at the hearing.

If the hearing officer determines that the issue has been previously decided in another proceeding, a decision may be rendered without proceeding with the hearing.

If the complainant or HPHA fail to appear at the scheduled hearing, the hearing officer may decide that the party has waived their right to a hearing. Such a determination will in no way waive the complainant's right to appropriate judicial proceedings in another forum.

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the HPHA must sustain the burden of justifying the HPHA action or failure to act against which the complaint is directed. The hearing shall be conducted by the hearing officer as follows:

- Informal: Oral and documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings;

OR

- Formal: The hearing officer shall require the PHA, complainant, counsel, and other participants and spectators to conduct themselves in an orderly manner. The failure to comply with the directions of the hearing officer to maintain order will result in the exclusion from the proceedings, or a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.

The HPHA may arrange, in advance, and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.

The hearing officer shall give the HPHA and the complainant a written decision, including the reasons for the decision, within a reasonable time following the hearing. The HPHA will place one copy in the tenant's files. The written decision will be sent to the tenant address provided at the hearing. The decision of the hearing officer shall be binding on the HPHA which shall take all actions necessary to carry out the decision unless the complainant files for a judicial review or trial in Circuit Court.

B. HCV Informal Review and Hearing Procedures

B.1. Informal Review Procedures

The HPHA provides applicants who are denied admission to the HCV Program the opportunity for an informal review. When the HPHA determines that an applicant is ineligible for the Program, the applicant is notified of their ineligibility in writing. The notice shall contain:

- A brief statement describing the reason(s) for the HPHA's decision;
- The procedure for requesting an informal review if the applicant does not agree with the decision; and
- The deadline to request an informal review.

The HPHA is not required to provide an informal review for any of the following reasons:

- Discretionary administrative determinations by the HPHA;
- General policy issues or class grievances;
- A determination of the family unit size under the HPHA subsidy standards;
- A determination not to grant approval of the tenancy;
- Determination that the unit is not in compliance with HQS/NSPIRE; or
- Determination that the unit is not in accordance with HQS/NSPIRE due to the family size or composition.

A request for an informal review must be made in writing and delivered to the HPHA either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of the denial of assistance. The HPHA will schedule and send a written notice of the informal review within 10 business days of the family's request.

The informal review may be conducted by any person or persons designated by the HPHA other than the person who made or approved the denial of admission or a subordinate of this person. At the informal review, the applicant will be given the opportunity to provide written or oral objections to the HPHA's decision. The HPHA will inform the applicant, in writing, of the final decision within 10 days after the informal review, including a statement of the reason(s) for the final decision.

B.2. Informal Hearing Procedures

The HPHA gives participant families the opportunity for an informal hearing to consider whether any of the following decisions conflict with Program rules and regulations:

- A determination of the family's annual or adjusted income and the use of such income to compute the Housing Assistance Payment;
- A determination of the appropriate utility allowance (if any) used for tenant-paid utilities from the HPHA's utility allowance schedule;
- A determination of the family unit size under the HPHA's subsidy standards;
- A determination that a certificate program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under the HPHA's subsidy standards, or the HPHA's determination to deny the family's request for an exception from the standards;
- A determination to terminate assistance for a participant family because of the family's failure to act;
- A determination to terminate assistance because the participant family has been absent from the assisted unit for longer than the maximum period permitted under HPHA and HUD rules;
- A determination to terminate a family's FSS contract, withhold supportive services, or propose forfeiture of the family's escrow account; or
- A determination to deny admission based on an unfavorable history that may be the result of domestic violence, dating violence, or stalking.

The HPHA is not required to provide a participant family an opportunity for an informal hearing for any of the following reasons:

- Discretionary administrative determinations by the HPHA;
- General policy issues or class grievances;
- Establishment of the HPHA schedule of utility allowances for families in the program
- A determination not to approve an extension or suspension of a voucher term;
- A determination not to approve a unit or tenancy;
- A determination that unit selected by the applicant is not in compliance with HQS or NSPIRE standards;
- A determination that the unit is not in accordance with HQS or NSPIRE standards because of family size; or
- A determination by the HPHA to exercise or not to exercise any right or remedy against an owner under a HAP contract.

In cases where the family makes a decision and an informal hearing must be offered, the notice to the family will include all of the following information:

- The proposed action or decision of the HPHA;
- A brief statement of the reasons for the decision including the regulatory reference;
- The date the proposed action will take place;
- A statement of the family's right to an explanation of the basis for the HPHA's decision;
- A statement that if the family does not agree with the decision the family may request an informal hearing of the decision;
- A deadline for the family to request the informal hearing;
- To whom the hearing request should be addressed; and
- A copy of the HPHA's informal hearing procedures

A request for an informal hearing must be made in writing and delivered to the HPHA either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of the HPHA's decision or notice to terminate assistance.

The HPHA must schedule and send written notice of the informal hearing to the family within 10 business days of the family's request.

The family may request to reschedule an informal hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the HPHA may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear at the scheduled time and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the HPHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The HPHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Informal hearings will be conducted by a person, or persons approved by the HPHA, other than the person who made or approved the decision under review or a subordinate of the person who made or approved the decision. The HPHA has designated the supervisor of the Rent Subsidy Section, and if unavailable, the Section 8 Subsidy Programs Branch Chief or its designee to serve as hearing officers.

During the informal hearing, the participant family has the right to:

- Present written or oral objections to the HPHA's determination;
- Examine the documents in the file which are directly relevant to the basis of the HPHA's action, and all documents submitted to the hearing officer;
- Copy any relevant documents at their expense;
- Present any information or witnesses pertinent to the issue of the informal hearing;
- Request that HPHA staff be available to present at the informal hearing to answer questions pertinent to the case; and
- Be represented by legal counsel, advocate, or other designated representative at their own expense.

During the informal hearing, the HPHA has the right to:

- Present evidence and any information pertinent to the issue of the informal hearing;
- Be notified if the family intends to be represented by legal counsel, an advocate, or another party;
- Examine and copy any documents to be used by the family prior to the hearing;
- Have its attorney present; and
- Have staff persons and other witnesses familiar with the case present.

The informal hearing shall concern only issues for which the family received the opportunity for a hearing. Evidence presented at the hearing may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The hearing officer will determine whether the action, inaction, or decision of the HPHA is in accordance with HUD regulations and HPHA policy based upon the evidence and testimony provided at the hearing. A notice of the decision will be provided, in writing, to the family and the HPHA within 10 business days of the informal hearing and shall include hearing information; a brief impartial statement of the reason(s) for the hearing; a summary of the evidence; the findings of fact; and a conclusion and determination of whether the HPHA's action is upheld or overturned. The HPHA is not bound by the hearing officer's decision which concerns a matter in which the HPHA is not required to provide an opportunity for an informal hearing, or that otherwise exceeds the authority of the person conducting the hearing; or conflicts with or contradicts HUD regulations or requirements, or otherwise contradicts federal, State, or local law.

Plan Element VI: Recent Revision(s)

N/A.

Plan Element VI: Proposed Revision(s)

N/A.

Plan Element VII. 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))

The HPHA does not operate or administer HCV homeownership programs.

Plan Element VII: Recent Revision(s)

N/A.

Plan Element VII: Proposed Revision(s)

N/A.

Plan Element VIII. Community Service and Self-Sufficiency Programs

Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

A. Family Self-Sufficiency Program

In accordance with 24 CFR §903.7(l)(ii), this section describes and provides an update on all activities related to the Family Self-Sufficiency Program.

The HPHA's Family Self-Sufficiency Program (FSS) provides participants with education, financial literacy, job training, job search assistance, and case management. Both public housing and HCV families are eligible to participate. As part of the FSS Program, the HPHA establishes an interest-bearing escrow account for each participating family. As a family's income grows, excess funds are deposited into their escrow account. The family is eligible to receive these funds at the completion of their FSS contract.

B. Section 3 Training and Employment

In accordance with 24 CFR §903.7(l)(ii), this section describes and provides an update on all activities related to Section 3 of the Housing and Community Development Act of 1968.

The HPHA assists its contractors with achieving Section 3 labor hour goals by:

- Requiring contractors to estimate Section 3 worker hours expected to be generated from initial contracts;
- Including Section 3 language in project application, set-up, and completion forms;

- Assisting contractors in their search for potential qualified Section 3 workers that can perform the duties required under their contracts; and
- Reviewing benchmarks with contractors and subcontractors to ensure that Section 3 requirements are understood.

The HPHA also publishes a list of Section 3 job opportunities on its website.

C. Other Self-Sufficiency Programs & Services

In accordance with 24 CFR §903.7(l)(i), this section describes services and amenities coordinated, promoted, or provided by the HPHA for assisted families, including programs provided or offered as a result of its partnership with other entities.

Program Name & Description	Size (est.)	Allocation Method	Service Locations
Child & Family Services Case management and congregate activities for elderly residents to improve residents' quality of life.	380	First come, first served	Kalakaua Homes Makua Alii Paokalani Pumehana Punchbowl Homes
Mental Health Kokua Case management and supportive services for mentally disabled persons.	125	First come, first served	Kalakaua Homes Makua Alii Paokalani Punchbowl Homes Pumehana

D. Community Service and Self-Sufficiency Requirement (CSSR)

In accordance with 24 CFR §903.7(l)(iii), this section briefly describes how the HPHA is complying with the requirements of 42 U.S.C. §1437jl and (d).

The HPHA requires all public housing tenants who are of working age, unemployed, and without a disability or other qualified exemption to participate in either:

- Eight (8) hours of community service activities per month;
- Eight (8) hours of an economic self-sufficiency program per month; or
- Eight (8) hours of a combination of both per month.

All tenants are made aware of the CSSR requirement at admission into the public housing program. PMMSB also sends quarterly reminders to all participating tenants to provide documentation of community service completed during their lease period. The HPHA may consider non-compliance with the terms of the CSSR as a violation of a tenant's rental agreement.

The HPHA entered into a formal written agreement with the Hawaii Department of Human Services (DHS) on April 8, 1997, to verify tenant participation in community service activities. The HPHA's Property Management and Maintenance Services Branch (PMMSB) also maintains documentation of tenants' exempt/nonexempt status and of all community service or self-sufficiency hours logged. Documentation includes written verification by a third-party of the tenant's name, address, and the dates and hours of participation/service performed.

Eligible community service activities may include but are not limited to:

- Actively participating in a community voluntary tenant patrol;
- Assisting grounds maintenance and community beautification projects;
- Assisting with a literacy and self-esteem program in an afterschool youth program;
- Assisting in a senior center providing elderly families with information on various services such as transportation; meals, etc.;

- Assisting in a homeless shelter kitchen; or
- Volunteering at a foodbank.

Eligible self-sufficiency activities may include but are not limited to:

- Job training;
- Employment counseling;
- Work placement;
- Basic skills training; and
- Education.

Ineligible activities include but are not limited to:

- Part-time or full-time employment, including seasonal or temporary employment;
- Political activities (e.g., lobbying, campaigning, advocacy activities); or
- Any activity performed or work ordinarily performed by HPHA employees.

For more information on the public housing program's community service requirement, please see Appendix B of the ACOP.

Plan Element VIII: Recent Revision(s)

N/A.

Plan Element VIII: Proposed Revision(s)

☐ Adopt a 15-hour weekly work requirement for all non-disabled, non-elderly individuals residing in public housing. The HPHA is requesting HUD approval of MTW Waiver 12.a. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 26)

☐ Adopt a 15-hour weekly work requirement for all non-disabled, non-elderly individuals receiving Section 8 rental assistance. The HPHA is requesting HUD approval of MTW Waiver 12.b. as part of its Amended MTW Supplement for FY 26, which is attached as **Attachment C**. (Added in FY 26)

~~N/A.~~

Plan Element IX. Safety and Crime Prevention

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 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)).

A. Need for Measures to Ensure Safety

In accordance with 24 CFR 903.7(m)(2)(i), this section describes the need for measures to ensure the safety of public housing residents.

The HPHA believes there is a significant need to improve tenant safety in neighborhoods with higher-level crime rates. The HPHA reviews all reported incidents of violent and drug-related crime in and around each public housing property project. Surveys and anecdotal evidence provided by tenants also used to determine where the need for additional safety measures is greatest. Observed lower-level crime (e.g., loitering, vandalism, graffiti, etc.) are monitored and responded to by each AMP management office.

B. Crime Prevention Activities

In accordance with 24 CFR 903.7(m)(2)(ii) and (iii), this section describes any crime prevention activities carried out by the HPHA and in partnership with appropriate police precincts.

The HPHA does not currently operate or administer in any formalized crime prevention programs. However, the HPHA regularly coordinates with State and county law enforcement to respond to reports of criminal behavior on its properties. Additionally, the HPHA is actively seeking to fill dwelling units reserved for law enforcement officers at certain public housing properties (refer to New Activities section).

C. Domestic Violence, Dating Violence, Sexual Assault, and Stalking Prevention

In accordance with 24 CFR 903.7(m)(i) through (iii), this section provides information on any activities, services, or programs offered by the HPHA or in partnership with another service provider to assist child or adult victims of domestic violence, dating violence, sexual assault, or stalking.

The HPHA adopted a VAWA Administrative Policy which sets forth the procedures and requirements it will follow when providing housing assistance and VAWA protections for tenants and participant families in each of its federal programs it administers. The HPHA does not operate or administer any programs or services which specifically assist child or adult victims of domestic violence, dating violence, sexual assault, or stalking.

Plan Element IX: Recent Revision(s)

N/A.

Plan Element IX: Proposed Revision(s)

☐ Adopt a new chapter or amend existing chapters in the Hawaii Administrative Rules to establish an updated VAWA policy for public housing and the HCV Program. (Revised in FY 26)

Plan Element X. Pet Policy

Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

A. Standard Pet Policy

All public housing tenants are allowed to own and keep pets so long as they are kept and maintained in accordance with HPHA's Pet Policy as well as State and local public health, animal control, and animal anti-cruelty laws, rules, and regulations.

All projects with pets have the Resident Association and/or a Project Pet Committee participate in a pet monitoring program and assist the HPHA in monitoring the pet policy.

Only domesticated, common household animals such as cats, dogs, birds, and fish can be kept as pets. A tenant may have only one pet, regardless of the category of the animal; except if the tenant has a small bird, in which case the tenant may have two small birds. The HPHA sets the maximum adult weight of any pet at 21 pounds.

All pets must be registered with the HPHA before they are brought onto a public housing property. Tenants with pets are required to pay a refundable deposit of $75 per household or an amount equal to their TTP, whichever is lower. They are also charged a non-refundable fee of $5 a month per household to cover reasonable operating costs associated with the maintenance of a project's common use areas. The pet fee does not apply to residents of elderly/disabled projects.

Tenants with pets shall receive a pet permit upon approval of their registration application. The pet permit must be renewed on an annual basis.

The HPHA may revoke a tenant's pet permit at any time, for any of the following reasons:

- The HPHA determines the pet is not being properly cared for;
- The pet presents a threat to the safety and security of other tenants, HPHA staff, contractors, or any other person on the premises;
- The pet is destructive or causes an infestation;
- The pet disturbs other tenants for reasons including but not limited to noise, odor, cleanliness, sanitation, and allergic reactions;
- The tenant fails to re-validate their pet ownership permit;
- The tenant fails to pay the monthly pet fee on a timely basis, if applicable; or
- The HPHA receives a written recommendation from a Resident Association and/or Project Pet Committee to revoke the tenant's pet permit due to a demonstrated lack of cooperation and responsibility to maintain the pet.

The violation of any rule listed in Chapter 10 of the ACOP may be grounds for removal of the pet or termination of the tenant's tenancy or both.

B. Assistance Animal Policy

The HPHA's standard pet policy does not apply to the keeping of assistance animals. "Assistance animal" means any animal that works, assists, or performs tasks for the benefit of a person with a disability. This includes service animals, support animals, and comfort animals.

For an animal to qualify as an assistance animal, a tenant must submit a reasonable accommodation request to the HPHA. If a tenant's disability is not obvious or readily known, they must provide a written certification from a reliable third party which verifies the qualifying disability and the need for the assistance animal.

The HPHA may deny a request if the presence of the animal would pose a direct threat to the health or safety of others, or would result in damage to the property that cannot be eliminated or substantially reduced.

Tenants with disabilities must still comply with the provisions of their rental agreements and are subject to the full list of reasonable conditions in Chapter 10 of the ACOP. If any reasonable condition is breached or any provision of the rental agreement is violated, or if an approved assistance animal causes bodily injury or property damage, the HPHA may rescind its approval and the tenant may be requested to remove the animal within 24 hours of notice. Violation of any of the reasonable conditions may also be grounds for termination of the tenant's tenancy.

Plan Element X:	**Recent Revision(s)**

N/A.

Plan Element X:	**Proposed Revision(s)**

N/A.

Plan Element XI. 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))

The operating and capital needs of the public housing program are reviewed and updated annually. In accordance with 24 CFR §905.300, the HPHA's CFP 5-Year Action Plan is developed and reviewed on an annual basis and takes into consideration building and site components.

The day-to-day operations of each public housing project is coordinated and overseen by the Property Management and Maintenance Services Branch (PMMSB) and by the Property Managers assigned to each Asset Management Project (AMP). PMMSB oversees the following management and maintenance tasks:

- Marketing and tenant selection;
- Rent collection;
- Routine and preventative maintenance;
- Unit turnover;
- Security;
- Resident services;
- Capital improvement planning; and
- Other activities necessary to support the efficient operations of each site.

PMMSB conducts management meetings on a monthly basis to review program performance across the HPHA's entire federal public housing inventory.

The HPHA's Property Mangers develop and monitor AMP budgets with support from the HPHA's Fiscal Management Office (FMO). Budget trainings with AMP staff are held annually. FMO provides each Property Manager with recent, property-specific utility and non-utility cost data to help with developing their budget estimates.

For more information on specific HPHA activities related to the rehabilitation, modernization, disposition, and redevelopment of its public housing inventory, please see **B.2. New Activities**.

Plan Element XI: Recent Revision(s)

N/A.

Plan Element XI: Proposed Revision(s)

N/A.

Plan Element XII. Substantial Deviation

PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

A “substantial deviation” from the 5-Year PHA Plan may include, but is not limited to:

- A change to a goal or objective identified in the 5-Year PHA Plan or Annual PHA Plan that is substantial but does not rise to the level of a “significant amendment;”
- A formal decision by the HPHA not to pursue a stated goal or objective;
- The substitution of a different set of activities to achieve a stated goal or objective;
- Administrative or programmatic changes resulting from the loss of adequate funding for a program; or
- The reallocation of funding to sustain a program.

The definition of a “substantial deviation” excludes:

- Amendments to the Hawaii Administrative Rules, the Admissions and Continued Occupancy Policy, or the Administrative Plan for the purposes of including federally mandated or non-discretionary changes to policy or as a result of the agency’s application for competitive grant opportunities;
- The elimination of a policy where a more stringent one exists or where two policies may appear to conflict, and one policy is eliminated to avoid confusion.

As part of the Rental Assistance Demonstration (RAD), Section 18 Disposition process, and the Section 22 Streamlined Voluntary Conversion process, the definition of a “substantial deviation” excludes the following items specific to the RAD, Section 18, and Section 22 programs:

- Changes to the Operating Fund or Capital Fund Budget produced as a result of each approved RAD, Section 18, or Section 22 conversion, regardless of whether the proposed conversion will include use of additional Operating or Capital Funds;
- Changes to the Relocation Plan and processes for each approved, RAD, Section 18, Section 22 conversion;
- Changes to the construction and rehabilitation plan for each approved RAD, Section 18, or Section 22 conversion;
- Changes to the financing structure for each approved RAD, Section 18, Section 22 conversion;
- The decision to convert to either Project-Based Rental Assistance or Project-Based Voucher Assistance; and
- Changes to a RAD, RAD/Section 18 blend, Section 18 Demolition and/or Disposition, or Section 22 Streamlined Voluntary Conversion Plan and/or application for such program(s) for units identified in an approved Plan.

Plan Element XII: Recent Revision(s)

N/A.

Plan Element XII: Proposed Revision(s)

N/A.

Plan Element XIII. 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.

The HPHA will amend or modify the 5-Year PHA Plan and/or Annual PHA Plan if:

- A federal statutory or regulatory change is made effective and, in the opinion of the HPHA, has either substantial programmatic or financial effects on the programs administered by the HPHA, or administrative burdens beyond the programs under administration at the start of the Plan year;

- The HPHA pursues a demolition, disposition, homeownership, Capital Fund Financing, development, or mixed-finance proposal that is not already identified in an approved Plan and would be considered by HUD to be significant amendment to the Annual PHA Plan and CFP 5-Year Action Plan;
- Excluding projects for which the HPHA will submit to HUD a Section 18 application or projects arising out of federally-declared major disasters or other acts of God beyond the control of the HPHA (e.g., earthquakes, fire and storm damages, civil unrest, or other unforeseen significant events), whenever a Capital Fund project not already in the 5-Year Action Plan either (1) experiences a change in the use of replacement reserve funds under the Capital Fund in the amount of $10 million or more, or (2) would affect more than 15% of a development's ACC unit count; or
- Any other event that the HPHA's Board of Directors determines to be a significant amendment or modification of the approved Annual PHA Plan.

Plan Element XIII: Recent Revision(s)

N/A.

Plan Element XIII: Proposed Revision(s)

N/A.

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	
☐	☒	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 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 Modernization
☐	☒	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.

New Activities: HOPE VI or Choice Neighborhoods

Provide 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. (Notice PIH 2011-47)

N/A.

New Activities: 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.

Kuhio Homes and Kuhio Low-Rises (as of October 1, 2024)

The HPHA's Board of Directors approved the Kuhio Homes and Kuhio Low-Rises (KPLR) pre-development budget in May 2024. An updated budget will be submitted to the Board for its approval during its October 2024 meeting. The HPHA anticipates financial closing for Phase 1 of the project to take place in Q1 of CY 2025, with construction is expected to begin shortly thereafter in Q2-Q3 of CY 2025.

The building permit set continues to advance through external agencies and other third-party review processes. The HPHA received third-party plan approval on the structural, building, electrical, and mechanical code reviews. As of July 2024, the City Department of Planning and Permitting's (DPP) Traffic Review Branch approved the traffic management plans for the redevelopment. The Honolulu Fire Department and Hawaii Department of Health (DOH) also completed their reviews of the project drawings. The HPHA received comments from DOH relating to the environmental site assessment and proposed soil sampling plan.

The HPHA and its development partner The Michaels Organization (TMO) have letters of intent from all participating lenders and investors. The letters were received from Redstone for the federal tax credit equity, Berkadia for the state tax credit equity, and from Bank of Hawaii for construction and permanent debt. Albert C. Kobayashi, Inc., the general contractor, completed an updated round of pricing based on the 100% construction set and is currently working through the value engineering process.

The HPHA and TMO held its latest community update meeting on July 11, 2024, for all KPLR residents. TMO is also working with its consultant, Seneca, on the project's relocation plan. The HPHA received approval of its Section 18 application from the HUD Special Applications Center (SAC) in August 2024. The HPHA anticipates the 90-day relocation notice to be sent to all KPLR residents during October 2024. The HPHA applied for 60 Tenant Protection Vouchers and anticipates receipt in October 2024. The project's 201H application has been executed by the HPHA and TMO and was submitted to the City DPP for final approval. The HPHA anticipates the 201H application will be approved in October 2024.

Modernization or Development Activity Summary

Development Name:	Kuhio Homes and Kuhio Low-Rises
AMP Number:	40
Project Address:	Ahonui Street Honolulu, Hawaii 96819
Project Type:	Family (General Occupancy)
Total Current Units:	174 Total Units (20 One-Bedroom Units, 32 Two-Bedroom Units, 37 Three-Bedroom Units, 77 Four-Bedroom Units, 8 Five-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	60
Est. PBV Request	TBD.

Mayor Wright Homes (as of October 1, 2024)

In 2023, Mayor Wright Homes was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new,

affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

In May 2024, the HPHA's Board of Directors approved a $10M pre-development loan to HCDC for Phase I of the redevelopment of Mayor Wright Homes. Execution of the loan is pending.

HPHA and HCDC received a "Determination of No Hazard to Air Navigation" from the Federal Aviation Administration in June 2024.

The project's 201H application for the Master Plan has been approved by HHFDC. The Master Plan is currently being revised, with changes to Phases 1A and 1B being studied. The HPHA and HCDC continue to weigh the use of Faircloth-to-RAD, PBVs, TPVs, and LIHTC at the project site. For-sale units up to 120% of AMI and 501(c)(3) rentals up to 100% of AMI are also being considered.

As of August 2024, the architectural and engineering teams were selected, and drafting of the working drawings and permit sets underway.

The SAC Section 18 application has been started, and the boundary areas for Phases 1A and 1B have been determined. The HPHA is awaiting receipt of a full boundary area survey report with metes and bounds descriptions. A Section 18 community meeting was held in September 2024 with all affected residents and neighboring community members. Future meetings with residents and the Resident Advisory Board are also being scheduled.

Modernization or Development Activity Summary

Development Name:	Mayor Wright Homes
AMP Number:	32
Project Address:	521 North Kukui Street Honolulu, HI 96817
Project Type:	Family (General Occupancy)
Total Current Units:	364 Total Units (24 One-Bedroom Units, 114 Two-Bedroom Units, 168 Three-Bedroom Units, 50 Four-Bedroom Units, 8 Five-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Pu'uwai Momi (as of October 1, 2024)

In 2023, Pu'uwai Momi was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

The HPHA and HCDC completed due diligence and massing studies for a 2,170-unit Master Plan. A sewer capacity analysis application has been submitted to the City DPP Wastewater Branch for review and approval. Preliminary utility approvals have been received from HECO, City BWS, Hawaii Gas, Spectrum, and Hawaiian Telcom. Confirmation was also received from the City Department of Environmental Services (ENV) that until further infrastructure upgrades are made, there is no additional sewer capacity at the project site (i.e., only a one-for-one replacement of existing units is possible currently). During the current and next fiscal years, the HPHA and HCDC will continue discussions with HECO and ENV on addressing infrastructure capacity issues.

In 2023, the HPHA also received funding from the State TOD Council to produce a vision study for the project site. The HPHA anticipates the vision study to be completed in CY 2025.

Modernization or Development Activity Summary

Development Name:	Puʻuwai Momi
AMP Number:	30
Project Address:	99-132 Kohomua Street Aiea, Hawaii 96701
Project Type:	Family (General Occupancy)
Total Current Units:	260 Total Units (48 One-Bedroom Units, 86 Two-Bedroom Units, 88 Three-Bedroom Units,38 Four-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Kaʻahumanu Homes (as of October 1, 2024)

In 2023, Kaʻahumanu Homes was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

The HPHA and HCDC are currently working on Master Plan refinement, associated technical studies, and entitlements work. The development team continues to work on its 201H entitlement application, which includes the preliminary Master Plan, with the goal of submission to the City DPP in Q4 of CY 2024. The HPHA and HCDC continue to weigh the use of Faircloth-to-RAD, PBVs, TPVs, and LIHTC at the project site.

Throughout the current and next fiscal year, the HPHA will continue discussions with Hawaiian Electric Company (HECO) and the City Board of Water Supply as each party determines required infrastructure upgrades and requirements. Although a preliminary HECO will-serve letter has been received, HECO's response to the pre-service request is still pending.

In August 2024, the HPHA held two town hall meetings with existing residents and surrounding community members.

Modernization or Development Activity Summary

Development Name:	Kaʻahumanu Homes
AMP Number:	33
Project Address:	Alokele Street Honolulu, Hawaii 96817
Project Type:	Family (General Occupancy)
Total Current Units:	152 Total Units (116 Two-Bedroom Units, 36 Three-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Kamehameha Homes (as of October 1, 2024)

In 2023, Kamehameha Homes was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

The HPHA and HCDC completed due diligence and massing studies for a 10-building, 2,950-unit Master Plan with connection to the neighboring Ka'ahumanu Homes site. Will-serve letter have been received from HECO, BWS, DPP Wastewater Branch, Spectrum, Hawaiian Telcom, and Hawaii Gas. During the current and following fiscal years, the development team will be obtaining a termite report for the site, developing an entitlement strategy and timeline, and developing a predevelopment and development budget and schedule.

Modernization or Development Activity Summary

Development Name:	Kamehameha Homes
AMP Number:	33
Project Address:	1541 Haka Drive Honolulu, Hawaii 96817
Project Type:	Family (General Occupancy)
Total Current Units:	221 Total Units (62 One-Bedroom Units, 123 Two-Bedroom Units, 36 Three-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Hale Laulima (as of October 1, 2024)

In 2023, Hale Laulima was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

The HPHA and HCDC completed due diligence and massing studies for a three-building, 705-unit Master Plan. Will-serve letters have been received from HECO, BWS, DPP Wastewater Branch, Spectrum, Hawaii Telcom, and Hawaii Gas. During the current and following fiscal years, the development team will continue working with HECO to determine required infrastructure upgrades as well as developing an entitlement strategy/timeline and the predevelopment budget.

Modernization or Development Activity Summary

Development Name:	Hale Laulima
AMP Number:	30
Project Address:	1184 Waimano Home Road Aiea, Hawaii 96701
Project Type:	Family (General Occupancy)
Total Current Units:	36 Total Units (20 Two-Bedroom Units, 16 Three-Bedroom Units)

Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Nanakuli Homes (as of October 1, 2024)

In 2023, Nanakuli Homes was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

In 2024, RMA Architects produced several concept plans for Nanakuli. The redeveloped project will likely consist of three-story, garden-style concepts and four-to-five-story concepts. RMA is redefining the preferred concept plan, and a final conceptual Master Plan is expected in Q3 in CY 2024. The project site will likely yield 90 to 120 units.

Modernization or Development Activity Summary

Development Name:	Nanakuli Homes
AMP Number:	44
Project Address:	Lualei Place Waianae, Hawaii 96792
Project Type:	Family (General Occupancy)
Total Current Units:	36 Total Units (36 Three-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Lanakila Homes (as of October 1, 2024)

In 2023, Lanakila Homes was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

In June 2024, the HPHA and HCDC submitted a revised Long-Term Environmental Hazardous Management Plan to the Hawaii Department of Health, Hazardous Evaluation and Emergency Response Division in response to the agency's comments. The geotechnical fieldwork study has been completed and concept design refinement has commenced.

In September 2024, the HPHA and HCDC held a town hall meeting with residents and neighboring community members to discuss the upcoming development.

Modernization or Development Activity Summary

Development Name:	Lanakila Homes
AMP Number:	37

Project Address:	600 Wailoa Street Hilo, Hawaii 96720
Project Type:	Family (General Occupancy)
Total Current Units:	164 Total Units (14 One-Bedroom Units, 66 Two-Bedroom Units, 44 Three-Bedroom Units, 20 Four-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Kahekili Terrace (as of October 1, 2024)

In 2023, Kahekili Terrace was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

The project is current on hold in the aftermath of the Lahaina wildfires; the HPHA and HCDC are concerned about relocating tenants while other ongoing redevelopment efforts in west Maui. The development team is currently evaluating alternative sites on Maui to develop first as potential relocation housing for existing Kahekili Terrace residents. In September 2024, the State was awarded a pro-housing grant from HUD where $500,000 is reserved for addressing infrastructure needs at Kahekili Terrace. Funds must be expended within next six years.

Modernization or Development Activity Summary

Development Name:	Kahekili Terrace
AMP Number:	39
Project Address:	2015 Holowai Place Wailuku, Hawaii 96792
Project Type:	Family (General Occupancy)
Total Current Units:	82 Total Units (12 One-Bedroom Units, 22 Two-Bedroom Units, 36 Three-Bedroom Units, 12 Four-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

Kapaʻa (as of October 1, 2024)

In 2023, Kapaʻa was included in the Ka Lei Momi Project which seeks to redevelop a significant portion of the HPHA's federal public housing inventory with the goal of developing more than 10,000 new, affordable units as part of mixed-use, mixed-income communities. The HPHA selected Highridge Costa Development Company (HCDC) as the master developer for Ka Lei Momi.

In 2024, the HPHA's Board of Directors approved the project's budget, schedule, and predevelopment loan. The subcontractor list for design work has also been finalized. Development of the working drawings will likely begin in Q3 of CY 2024.

The project's 201H entitlement application was approved in early 2024 by HHFDC. A LIHTC application was submitted also in early 2024 and pending approval in Q4 of CY 2024. The HPHA anticipates building permits submittal in Q4 of CY 2024 or Q1 of CY 2025. The HPHA and HCDC are considering use of Faircloth-to-RAD, PBVs, and TPVs at the project site. The County of Kauai is also considering use of PBVs at the project.

Modernization or Development Activity Summary

Development Name:	Kapa'a
AMP Number:	38
Project Address:	4726 Malu Road Kapaa, Hawaii 96746
Project Type:	Family (General Occupancy)
Total Current Units:	36 Total Units (6 One-Bedroom Units, 8 Two-Bedroom Units, 12 Three-Bedroom Units, 10 Four-Bedroom Units)
Repositioning Tool(s):	TBD.
Est. TPV Request:	TBD.
Est. PBV Request	TBD.

New Activities: 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.

2023 Maui Wildfires

In August 2023, wildfires in Lahaina, Maui completely destroyed two federal public housing properties managed under AMP 39 (Project No. HI0010039). Both properties, David Malo Circle and Piilani Homes, are considered to be total physical losses. The HPHA is preparing an after-the-fact Section 18 application to initiate the demolition process. Tenant Protection Vouchers were received as an emergency housing option for residents who were displaced. The HPHA has procured a consultant to assist with the Section 18 application and the Part 58 Environmental Review (ER). The HPHA anticipates the ER will be completed by March 2025.

Demolition/Disposition Activity Summary

Development Name:	David Malo Circle
AMP Number:	39
Project Address:	Mill Street Lahaina, Hawaii 96761
Total Units:	18 Total Units (2 One-Bedroom Units, 4 Two-Bedroom Units, 10 Three-Bedroom Units, 2 Four-Bedroom Units)
Accessibility Features:	N/A

SAC Application Status:	SAC application has been created. As of October 1, 2024, SAC also received letter from Governor regarding emergency declaration and approved demolition prior to completed application.

Development Name:	Piilani Homes
AMP Number:	39
Project Address:	1028 Wainee Street Lahaina, Hawaii 96761
Total Units:	42 Total Units (32 Studios, 10 One-Bedroom Units)
Accessibility Features:	N/A
SAC Application Status:	SAC application has been created. As of October 1, 2024, SAC also received letter from Governor regarding emergency declaration and approved demolition prior to completed application.

Physical Obsolescence

The HPHA may request HUD's approval of the demolition and/or disposition of the Pahala in AMP 37 and Kupuna Home O Waialua in AMP 49. These projects are not built to current code, and the cost to modernize each one is equivalent to the cost to demolish and rebuild.

Demolition/Disposition Activity Summary

Development Name:	Pahala
AMP Number:	37
Project Address:	96-1169 Kou Street Pahala, Hawaii 96777
Total Units:	24 Total Units (16 Studios, 8 One-Bedroom Units)
Accessibility Features:	N/A
SAC Application Status:	N/A

Development Name:	Kupuna Home O Waialua
AMP Number:	49
Project Address:	67-088 Goodale Avenue Waialua, Hawaii 96791
Total Units:	40 Total Units (24 Studios, 16 One-Bedroom Units)
Accessibility Features:	N/A
SAC Application Status:	N/A

County Easements and/or Dedications

The HPHA may request HUD approval of non-exclusive easements or dedications at certain federal public housing properties to the applicable county government. These requests would not impact the HPHA's ACC unit count.

The HPHA intends to dedicate portions of the street(s)/sidewalk(s) at Lanakila Homes to the County of Hawaii. For reasons now unknown, a dedication did not take place after one of the phases of the project's initial construction. Hawaii County is not averse to taking ownership of the streets per the HPHA's ongoing discussions. The county has continued to repair and repave the HPHA's streets as most of the streets in the neighborhood belong to the county.

Kalihi Valley Homes Community Center (as of October 1, 2024)

The HPHA will request HUD approval for the demolition of the Community Center at Kalihi Valley Homes. The elevated building is currently closed and is not in use. The HPHA contracted a consultant to study alternatives to rehabilitating the structure and a possible replacement. It was determined that demolition is necessary. The HPHA's consultant is currently in the design phase of the project and is preparing the SAC Section 18 application. The Hawaii State Legislature appropriated funds for the demolition during the 2024 legislative session. The HPHA plans to hold the bid opening in 2026.

Other Applications for Demolition and/or Disposition

The HPHA is providing notice that it may, at any time during the fiscal year, submit an application to the HUD Special Applications Center to demolish and/or dispose of public housing units or other properties from its public housing inventory for any of the following reasons:

- There is evidence of substantial physical issues with a project's building(s) or dwelling unit(s) (e.g., critical structural issues, deficiencies in major systems, deterioration due to prolonged deferred maintenance, etc.) that are not cost-effective to repair. This includes damages to a project that were caused by natural or human-caused disasters and other acts of God;
- There is evidence that a project's location causes obsolescence or presents serious obstacles to maintain dwelling units as healthy and safe housing (e.g., environmental factors, proximity to a highway/factory makes a project no longer suited for residential use, etc.);
- There are other factors and conditions which impact the marketability, usefulness, or management of dwelling units and seriously impede operations for residential use;
- De Minimis demolition;
- Continued operation is infeasible because of a lack of demand for dwelling units;
- To improve the efficiency and effectiveness of on-site or off-site development;
- As part of a RAD-Section 18 blend;
- To remove scattered-site dwelling units that are unsustainable to operate and/or maintain; or
- To remove a non-dwelling buildings or vacant land that exceeds the needs of a project.

A full list of all federal public housing properties in the HPHA's public housing inventory is attached as **Attachment D.**

New Activities: 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))

N/A.

New Activities: Conversion of Public Housing under the Voluntary or Mandatory Conversion Programs

Describe 1) 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. (24 CFR §903.7(j))

N/A.

New Activities: Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD

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.

The HPHA may apply to convert dwelling units at the following public housing properties to project-based assistance under the guidelines established by Notices PIH 2012-32, REV-3, REV-4, and any successor notices, and Notice PIH 2021-07:

Property Name (All Family Units)	Bedroom Size						Total Units Per Property
	0	1	2	3	4	5	
Kuhio Homes & Low-Rises	0	20	32	37	77	8	174
Mayor Wright Homes	0	24	114	168	50	8	364
Pu‘uwai Momi	0	48	86	88	38	0	260
Ka‘ahumanu Homes	0	48	86	88	38	0	260
Kamehameha Homes	0	62	123	36	0	0	221
Hale Laulima	0	20	16	0	0	0	36
Nanakuli Homes	0	0	0	36	0	0	36
Lanakila Homes	0	14	66	44	20	0	144
Kahekili Terrace	0	12	22	36	12	0	82
Kapa‘a	0	6	8	12	10	0	36
‘Ele‘ele	0	2	6	10	6	0	24
Total Units	**0**	**256**	**559**	**555**	**251**	**16**	**1,637**

Pursuant to the RAD CHAP awards, the HPHA will apply on the Inventory Removal module in PIC, or HIP upon its implementation, for the disposition of project sites.

During the RAD conversion process, the HPHA will ensure it fully complies with federal Fair Housing requirements by providing the required percentage of accessible dwelling units at each development for families with mobility and hearing/vision impairments. The HPHA will also adopt the resident rights, participation, waiting list, and grievance procedures listed in Section 1.6 of the RAD Notice H-2019-09 PIH-2019-23 Rev. 4 (**Attachment E**); the RAD Fair Housing, Civil Rights, and Relocation Notice - Notice H 2016-17 PIH 2016-17 (HA) (**Attachment F**), and the Joint Housing/PIH Notice H-2014-09/ PIH-2014-17 (**Attachment G**).

The HPHA is currently compliant with all fair housing and civil rights requirements. Any RAD conversion the HPHA engages in will comply with all applicable site selection and neighborhood reviews standards. The HPHA is not currently under any Voluntary Compliance Agreement, consent order, consent decree, final judicial ruling, or administrative ruling or decision. Upon the RAD conversion of a property, the HPHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration. The HPHA may also borrow funds to address its capital needs.

New Activities: 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))

N/A.

New Activities: Occupancy by Police Officers

The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State, or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR §903.7(b))

The HPHA reserves the right to place police officers who would not otherwise be eligible for the public housing program into a public housing dwelling unit if it is determined that their presence would improve the safety and security of a project's residents. In exchange, a police officer agrees to provide services to the residents such as weekly office hours, "meet and greet" visits, and wellness checks.

The table below lists all dwelling units currently designated for occupancy by a police officer in IMS/PIC as of **October 1, 2024**:

AMP No.	Project No.	Project Name	Unit No.	Address
37	1097	Kauhale O Hanakahi	A4401	19 Pamala St Hilo, HI 96720
37	1004	Lanakila Homes I	0017B	600 Wailoa St Hilo, HI 96720
37	1028	Punahele Homes	0130R	6-B Lokahi Pl

				Haiku, HI 96708
43	1061	Ka Hale Kahaluu	0003L	78-6725 Makolea St Kailua-Kona, HI 96740
43	1070	Kealakehe	A101	74-991 Manawale`a St Kailua-Kona, HI 96740
43	1063	Nani Olu	4E	81-1011 Nani Kupuna Pl Kealakekua, HI 96750
46	1097	Ke Kumu ‘Ekolu	B2208	68-3385 Ke Kumu Pl Waikoloa, HI 96738

The HPHA may designate dwelling units at the following public housing projects for occupancy by a police officer to improve safety and security:

AMP No.	Project No.	Project Name	Address
30	1026	Pu‘uwai Momi	99-132 Kohomua St Aiea, HI 96701
31	1005	Kalihi Valley Homes	2250 Kalena Dr Honolulu, HI 96819
32	1003	Mayor Wright Homes	521 N Kukui St Honolulu, HI 96817
33	1099	Kamehameha Homes	1541 Haka Dr Honolulu, HI 96817
34	1012	Makua Alii	1541 Kalakaua Ave Honolulu, HI 96826
37	1004	Lanakila Homes	600 Wailoa St Hilo, HI 96720
43	1032	Kaimalino	74-5060 Kealakaa St Kailua-Kona 96740
43	1053	Hale Hookipa	81-1038 Nani Kupuna Pl Kealakekua, HI 96750
44	1057	Waimaha-Sunflower	85-186 McArthur St Waianae, HI 96792
44	1091	Kau‘iokalani	85-658 Farrington Hwy Waianae, HI 96792
45	1030	Ko‘olau Village	45-1027 Kamau Pl Kaneohe, HI 96744
49	1050	Kupuna Home O‘ Waialua	67-088 Goodale Ave Waialua, HI 96791
49	1015	Wahiawa Terrace	337 Palm St Wahiawa, HI 96786

New Activities: 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)).

The HPHA is exploring the possibility of using Project-Based Vouchers at the nine public housing projects being redeveloped as part of the Ka Lei Momi Redevelopment Project. More information on the status of each project is provided in the **New Activities: Mixed Finance** section above.

The HPHA requested three PBV-related waivers in its Amended MTW Supplement for FY 25. Under MTW Waiver 9.a., the HPHA may increase the number of authorized units that can be project-based up to 50% of the agency's total authorized HCV units or annual budget authority. Under MTW Waiver 9.b., the HPHA may increase the amount of non-excepted dwelling units at a single covered project up to 100%. Under MTW Waiver 9.g., the initial and redetermined contract rents for a PBV project could be set up to the lower of (a) 110% of the applicable SAFMR minus any utility allowance, or (b) the reasonable rent.

New Activities: 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).

All HUD-approved vacant dwelling units listed on IMS/PIC as of **October 1, 2024** are (1) currently undergoing modernization (i.e., the modernization contract has been awarded or force account work has started); or (2) vacant so that modernization work can be performed and the time period for placing the unit under construction has not yet expired.

New Activities: Other Capital Grant Programs

Includes Capital Fund Community Facilities Grants or Emergency Safety and Security Grants.

N/A.

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.

Goal 1: Increase the Availability and Accessibility of Housing Assistance

Description The HPHA will look to provide more low-income families with the housing assistance they need through the programs and services it already operates. Despite the ever-present concern of federal funding shortfalls, the HPHA must ensure it operates efficiently and cost-

effectively in order to accomplish this goal. Increasing the accessibility of affordable housing assistance includes the removal of barriers to access and ensuring equitable outcomes for vulnerable groups.

Objective 1.a. Maximize the amount of assistance the agency can provide with the resources currently available to it.

Objective 1.b. Overcome barriers to fair housing within HPHA programs and services.

Goal 2: Improve the Quality of Existing Housing Programs

Description The HPHA will improve the quality of each program and service it administers. Streamlining procedures and fixing inefficiencies benefit staff and program participants alike. Performing regular reviews of existing procedures, addressing bottlenecks, measuring results, and gathering constructive feedback from the people we serve all helps to ensure the HPHA is adhering to its mission and that its efforts are having the desired impact.

Objective 2.a. Meet or exceed HUD's standards for overall program performance.

Objective 2.b. Improve living environments and quality of life for public housing participants.

University of Hawaii Broadband Project

The HPHA will participate in a University of Hawaii (UH) pilot project to provide free broadband infrastructure and service at all low-income public housing properties. This project is part of UH's Capital Projects Fund request to the United States Treasury to improve digital equity and literacy within the State of Hawaii. In September 2024, UH published a Request for Proposals and received two responses. UH is currently in negotiations with the two respondents.

Water Conservation Pilot Project

On June 18, 2024, the HPHA met with the City and County of Honolulu Board of Water Supply (BWS) to continue work on a Water Conservation Pilot Project at Kamehameha Homes. BWS will be assessing the efficiency of fixtures and equipment at the project and identifying potential upgrades within units and common areas. The pilot project ran from July to August 2024. BWS and the HPHA fixed or replaced 82 showerheads, 124 handheld showerheads, 190 kitchen aerators, 5 toilet flappers, and 211 garden hose nozzles. The project is expected to save a potential 900,000 gallons of water each year. The HPHA is currently looking to perform similar replacements/fixes with BWS at other public housing properties.

Objective 2.c. Improve general administrative proficiency and reduce administrative burden.

Objective 2.d. Increase customer satisfaction for program participants and landlords.

Goal 3: Promote Greater Economic Self-Sufficiency for Program Participants

Description	The HPHA aims to provide its program participants with the tools and resources they need to achieve their personal financial goals. Through an offering of support services, employment training and placement, and financial literacy education, the HPHA hopes to help low-income families and individuals break the cycle of poverty.
Objective 3.a.	Increase access to employment opportunities for program participants.
Objective 3.b.	Explore partnerships with other state/local agencies and community-based organizations to provide additional services and/or housing assistance.

Goal 4: Develop and Increase Affordable Housing Opportunities

Description	The State of Hawaii continues to face a severe affordable housing crisis. With thousands of people struggling to remain housed, the HPHA can help to addresses this problem by expanding its housing portfolio and the amount of assistance it can provide. The HPHA will accomplish this goal by constructing new affordable units, rehabilitating obsolete properties, and applying for other funding sources.
Objective 4.a.	Increase the number of affordable housing units statewide by pursuing opportunities for public-private partnerships and mixed-finance redevelopment, where feasible.
Objective 4.b.	Explore opportunities to utilize the Rental Assistance Demonstration (RAD) Program, where feasible.
Objective 4.c.	Explore opportunities to project-base HCV assistance at the HPHA's State-aided public housing projects.
Objective 4.d.	Apply for additional tenant-based rental assistance and competitive grant funding as opportunities arise and if the administrative capacity exists.

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.

The HPHA's CFP 5-Year Action Plan for FY 2023 to FY 2027 was approved in EPIC on June 6, 2023.

Please see **Attachment H: CFP 5-Year Action Plan for FYs 2023 to 2027**.

B.5 **Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y	N
☐	☒

(b) If yes, please describe.

C. Other Document and/or Certification Requirements.

C.1 **Resident Advisory Board (RAB) Comments.**

(a) Did the RAB(s) have comments to the PHA Plan?

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. Please see **Attachment I: RAB Comments**.
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. Please see **Attachment J: Certification by State or Local Official**.
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. Please see **Attachment K: Civil Rights Certification**. Please see **Attachment L: Certifications of Compliance with PHA Plan and Related Regulations**.
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. Please see **Attachment M: Public Testimony**.
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. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)** **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.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal.
	Fair Housing Goal:
	Describe fair housing strategies and actions to achieve the goal.

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)

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. Plan Elements. All PHAs must complete this section.

B.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(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **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 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))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

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

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.