

Streamlined Annual PHA Plan (Small PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-SM is to be completed annually by **Small PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer 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.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: Troy Housing Authority _____ PHA Code: NY012 _____ PHA Type: <input checked="" type="checkbox"/> Small PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2022 _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 147 _____ Number of Housing Choice Vouchers (HCVs) 2043 _____ Total Combined 2190 _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission for 2022 and review of 2020 to 2024 5 Year Plan <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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Lead PHA:																											

B.	<p>Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).</p>
B.1	<p>Per above instructions the Troy Housing Authority does not need to complete this Section.</p> <p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Five-Year PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs. <input type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input type="checkbox"/> <input type="checkbox"/> Financial Resources. <input type="checkbox"/> <input type="checkbox"/> Rent Determination. <input type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input type="checkbox"/> Pet Policy. <input type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p>
B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.

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

A demolition application for the units of John P. Taylor Apartment Buildings 1 and 2 (NY012200007P) was approved by the HUD Special Applications Center on December 18, 2009. John P. Taylor Apartments Building 1 and 2 was a family high-rise buildings consisting of 143 units (17 One-Bedroom units, 75 Two-Bedroom units, 46 Three-Bedroom Units, 1 Four-Bedroom Unit and 4 Units taken off line) within two nine story buildings. The buildings and units have not yet been demolished. We are exploring financing and development options to replace these units that may involve RAD Conversion (e.g. a Section 18 and RAD Blend), Choice Neighborhoods, Mixed Finance Modernization or Development as well as various options related to demolition or disposition of the structures and property. We have engaged Pennrose, LLC as our development partner relative to the redevelopment of the entire Taylor Apartments site (Buildings 1, 2, 3, and 4) and they are working with us on various funding options. We are meeting with Taylor tenants and we are incorporating their ideas into our plans to the fullest extent possible.

Our RAD conversions for all sites other than Taylor 1 and 2 have resulted in conversion to Project Based Vouchers through RAD. There are 21 Martin Luther King units that are part of a Conversion After Transfer (CAT) Agreement and will be completed in the near future. Beacon Communities, LLC completed the revitalization of Martin Luther King Apartments that involved the de-densification and relocation of units. The 21 CAT units will be relocated off site as part of the revitalization within the neighboring community; most likely in conjunction with the revitalization of the Arnold E. Fallon Apartments with Beacon Communities, LLC as our development partner.

We are also participating in the New Your State Preservation Opportunity Program (NYS POP) which is helping us develop long term revitalization strategies for all of our properties. This has resulted in the selection of MDG Real Estate Partners, LLC as our development partner for Griswold Heights, Corliss Park, Grand Street, Phelan Court and Sweeney Apartments. We are also upgrading kitchens, bathrooms and flooring at Kane Apartments and Conway Court without the use of a development partner.

Based on a Fair Housing visit we are looking at enhancing our efforts to address special needs populations. We have added the required number of hearing and visually impaired units and handicapped parking spaces – including with van accessibility and we are working on increasing the number of accessible units. This is turning out to be a costly endeavor and we are considering alternatives relative to funding this very important initiative which will likely be part of the redevelopment being planned with MDG.

Based on the number of Section 8 Vouchers we administer, the housing authority could project-base up to 185 vouchers. Presently 134 units have been project based at Kennedy Towers and 28 have been project based at Tapestry on the Hudson, a project of The Community Builders. We have the capacity to Project Base 23 more. Within the City of Troy, participants within the Section 8 Program are finding it increasingly more difficult to locate apartments that meet their needs and measure up to Housing Quality Standards. This is especially true for our elderly population and for families with young children, especially working families being impacted by rising rental costs in our area. For the elderly there are a limited number of apartments that are handicapped adaptable and offer the array of services they need to remain in the community. Also, due to the age of the housing stock in the city, many families with young children are finding it difficult to locate apartments that are free of the hazards associated with lead-based paint. We hope to address these issues with additional Project Based Vouchers. De-centralizing Section 8 staff has also improved participant access to their workers.

We continue to apply for Mainstream Section 8 vouchers to serve non-elderly person with a disability, at least 18 years old and less than 62 years old, transitioning out of an institutional setting, or at serious risk of institutionalization, or homeless or at risk of being homeless. Thus far we have received funding to provide 57 Mainstream Section 8 vouchers and began serving this population on January 1, 2018. Similarly, we continue to apply for VASH vouchers to serve homeless Veterans and presently have 25 VASH vouchers in use or available. We also received 21 Emergency Housing Vouchers and are working diligently to get these vouchers utilized.

(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.

With the local affordable rental market consistently getting tighter, with some apartments that do not meet today's living standards and other demanding higher rents the Troy Housing Authority hopes to address this by Project Based as many units as possible in areas that enable our participants full access to the services and resources they need to improve their life circumstances.

(d) The PHA must submit its Deconcentration Policy for Field Office Review. It is attached.

B.3 Progress Report.

Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

2020 – 2024 Goals and Objectives	2021 Plan Status (Progress Report)
<p>1. Expand the supply of assisted housing to the fullest extent needed by:</p> <ul style="list-style-type: none"> a. Applying for additional rental vouchers b. Reducing vacancies in apartments we manage c. Leveraging private/public funds to create housing opportunities d. Acquiring or build units or developments e. Work with the City to develop a broad based approach to housing and neighborhood revitalization. 	<p>Efforts to expand supply of housing continue. We continually apply for VASH and Mainstream vouchers. Modernization of MLK site with Beacon is completed and will expand to Fallon. We are working with Pennrose to improve entire Taylor site in a mixed finance, mixed use manner. We also work with the City of Troy and others to leverage funds to create additional housing and the NYS POP program to improve our other sites with MDG.</p>
<p>2. Improve the quality of assisted housing by:</p> <ul style="list-style-type: none"> a. Assure that all our apartments meet/exceed Housing Quality Standards (HQS) as determined by independent inspections b. Attain/Maintain SEMAP attaining/maintaining High Performer status c. Increasing customer satisfaction as indicated through retention. d. Improve management functions through site based management as well as exploring the idea of relocating the administration building. e. Renovate, modernize or replace remaining public housing units: Taylor Buildings 1&2 (vacant), Martin Luther King remaining units. f. Renovate/modernize all properties when funds are available. g. Demolishing or disposing of obsolete public housing. h. Providing replacement public housing: for units taken out of service. i. Providing replacement vouchers when this is the most suitable option. j. Explore/pursue HUD initiatives 	<p>All apartments are inspected for HQS in accordance with RAD. Our 2019 SEMAP score of 100% (135/135) makes us a High Performer (No score in 2020 due to pandemic). Application to demolish Taylor 1&2 units is approved but may be modified. We may replace 140+/- units of Taylor 1&2 with alternate housing. Our transition to RAD is nearly complete. 21 MLK units are awaiting conversion and will be placed in neighboring community with Fallon redevelopment with Beacon. Senior only Kane and Conway improvements planned include new kitchens, updated bathrooms and flooring). We are participating in the NYS Preservation Opportunity Program and will develop improvement plans for all our sites with MDG Real Estate Group. We are smoke free.</p>
<p>3. Increase assisted housing choices by:</p> <ul style="list-style-type: none"> a. Providing voucher mobility counseling b. Conducting outreach efforts to potential voucher landlords c. Evaluating and setting appropriate voucher payment standards d. Expanding homeownership opportunities e. Continue site based waiting list. f. Assist the most needy families in our community by monitoring and amending our preferences as needed. 	<p>Mobility counseling and landlord outreach continue. Voucher Homeownership has had successes as we continue to promote homeownership. Our preference for applicants in our jurisdiction made homeless through no fault of their own residing in shelters or motels with assistance from RCDSS has helped avoid the trauma of long term homelessness. We have a ranked preferences for homeless vets and vets at one location and 19 PBV units set aside for DV survivors receiving supportive services. We have 21 new Emergency Voucher.</p>
<p>4. Provide an improved living environment by:</p> <ul style="list-style-type: none"> a. Deconcentrating poverty by bringing higher income households into lower income developments b. Promoting income mixing by assuring access for lower income families in higher income sites c. Continuing security improvements within our complexes. d. Assuring that tenants understand the expectations of living in a community environment. 	<p>For 2021 no covered site is below or above the proscribed band of 85% to 115% of the THA average. No action is necessary to address this matter. Public Safety and Lease Enforcement efforts continue; cameras and license plate readers are installed and very effective. We continue to participate in community forums and events and have numerous outside agencies providing services on site. We are smoke free.</p>
<p>5. Promote self-sufficiency and asset development of assisted households by:</p> <ul style="list-style-type: none"> a. Increasing the number/percentage of employed persons in assisted families by maintaining an average better than New York State. b. Provide access to supportive services to improve employability: transportation, day care, education, job training, etc. c. Providing supportive services to increase independence for the elderly or families with disabilities. 	<p>Family Self Sufficiency and Homeownership Programs remain operational and we continue to experience successes. We work with Community Agencies to improve tenant life circumstances by making referrals, hosting on-site outreach and on-site programming. We continue to work with the City of Troy on various projects.</p>
<p>6. Ensure equal opportunity and affirmatively further fair housing</p> <ul style="list-style-type: none"> a. Undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability: b. Undertaking affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability: c. Undertaking affirmative measures to ensure accessible housing to persons with all varieties of disabilities. 	<p>The Troy Housing Authority remains committed to carrying out the duty to affirmatively further fair housing. We remain guided by the Analysis of Impediments (AI) to Fair Housing identified by the City of Troy and we are working toward creating more accessible apartments within our existing developments and in new housing opportunities that arise. We have increased the supply of accessible units and will continue to do so.</p>

	<p>7. Take proactive measures to serve the needs of child & adult victims of domestic violence, dating violence, sexual assault, or stalking by:</p> <ul style="list-style-type: none"> a. Notifying all public housing tenants, Section 8 voucher participants and Section 8 landlords of their rights and obligations under the Violence Against Women Act (VAWA). b. Making referrals and Collaborate with local service providers (e.g. Unity House, Traveler's Aide, etc.) to help such families obtain services that may enable them to stay in their home away from the person or persons placing them at risk. c. Taking any necessary legal action to terminate the tenancy of any person committing criminal acts of physical violence against family members or others. 	<p>Notification to tenants occur in newsletter/flyer and at lease up and recert. Issues related to Domestic Violence (DV), inc. transfer request and lease bifurcation, are handled professionally, making referrals to service providers and police. Lease Enforcement and Public Safety are mindful of DV issues and address appropriately. DV training, child abuse awareness & response training, as well as suicide awareness & response training have been provided to staff. Troy DV Victims in Shelters or Motels assisted by RCDSS are given a homeless preference point. VAWA transfer requests are facilitated with a safety agreement.</p>
<p>B.4</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>2019 – 2023 Capital Fund Program 5-Year Plan was approved in EPIC on 10/30/19. 2020 – 2024 Capital Fund Program 5-Year Plan was submitted to EPIC on 03/05/21 and is awaiting approval.</p> <p>Presently, all allocations of Capital Funds are being directed to anticipated pre-demolition and demolition work of Taylor 1 & 2 (our only remaining public housing units).</p>	
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(c) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(d) If yes, please describe:</p>	
<p>C</p>	<p>Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/> September 23, 2021 at 6:00PM</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>	
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><i>Form HUD-50077-CRT-SM, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed,</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>	

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>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.</p> <p>Per Instruction: 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.</p> <p>Therefore, this section is being used to examine and document the Troy Housing Authority programs in response to the most recently posted City of Troy Analysis of Impediments to Fair Housing Choice (AI).</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>IMPEDIMENT 1: High income levels and fees requested to rent apartments limits choices for persons on fixed incomes. THA: Subsidized rents provided by Troy Housing Authority programs help to mitigate this impediment.</p> <p>IMPEDIMENT 2: Limited financial assistance for the elderly, low income, and disabled. THA: Subsidized rents provided by Troy Housing Authority programs and Troy Housing Authority housing stock designated for elderly occupancy help to mitigate this impediment.</p> <p>IMPEDIMENT 3: Lack of accessible housing and accessibility barriers are impeding fair housing opportunities for persons with disabilities. THA: The THA makes reasonable accommodations for individuals with disabilities, consistent with Section 504 of the Rehabilitation Act of 1973, and the Fair Housing Amendments Act of 1988. The THA shall make its accessible units available to persons who have mobility impairments. THA is also adapting additional units to make them accessible to meet the HUD standard of 5% of units accessible for individuals with mobility impairment and 2% of units adapted for persons with hearing or visual impairments. We have achieved in adapting 2% of our units for persons with hearing or visual impairments and are working on our 5% of units accessible for individuals with mobility impairment.</p> <p>IMPEDIMENT 4: Lack of affordable owner-occupied housing. THA: Troy Housing Authority’s Section 8 Homeownership program helps to mitigate this impediment.</p> <p>IMPEDIMENT 5: Inadequate supply of Section 8 housing units. THA: THA has Project Based 162 of our 925 Tenant Based Voucher and is open to Project Basing the remaining 23 allowed by HUD. THA has also applied for additional vouchers when available, including Mainstream, VASH and Emergency Housing Vouchers.</p> <p>IMPEDIMENT 6: Discriminatory or unethical practices by landlords. THA: THA reports such practices to HUD when we become aware of them.</p> <p>IMPEDIMENT 7: Lack of available vacant land in Troy to build affordable housing. THA: THA will continue to work with the City of Troy on locating suitable sites for affordable housing.</p> <p>IMPEDIMENT 8: Lack of education regarding fair housing laws. THA: THA will work with the City of Troy on the dissemination of materials to educate the public on fair housing laws.</p> </div>



Administrative Offices

One Eddy's Lane
Troy, NY 12180

Phone: (518) 273-3600
Fax: (518) 274-6633

Capital Funds Summary

Existing Capital Funds Remaining

Capital Fund Year	Martin Luther King Phase III (21 units to be built)	Taylor Apartments 1 & 2 (143 units to be demolished)
2018	\$0.00 *	\$0.00
2019	\$0.00	\$275,109.00
2020	\$41,933.00	\$377,213.00
2021	\$40,000.00	\$399,316.00
Total	\$81,933.00	\$1,051,638.00

*\$155,117.81 in 2018 CFP funds previously allocated to Martin Luther King Phase III being redistributed proportionately to other RAD sites to meet the expenditure deadline.

Anticipated Capital Funds

(Actual Amounts May Vary and Will Decrease As Units Move Out of Public Housing)

Capital Fund Year	Martin Luther King Phase III (21 units to be built)	Taylor Apartments 1 & 2 (143 units to be demolished)
2022 (estimated)	\$50,000.00	\$380,000.00
2023 (estimated)	\$0	\$440,000.00
2024 (estimated)	\$0	\$450,000.00
Total	\$50,000.00	\$1,270,000.00

Grand Total (Existing and Anticipated Capital Funds)

(Actual Amounts May Vary and Will Decrease As Units Move Out of Public Housing)

Capital Fund Year	Martin Luther King Phase III (21 units to be built)	Taylor Apartments 1 & 2 (143 units to be demolished)
Grand Total	\$131,933.00	\$2,321,638.00

Martin Luther King funds to be used for Initial Year Funding and Initial Deposit to Replacement Reserves.

Taylor Apartments 1 & 2 funds to be used for pre-demolition and demolition activities.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Small PHAs)**

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning January 1, 2022 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):
 - ___ 903.7a Housing Needs
 - ___ 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
 - ___ 903.7c Financial Resources
 - ___ 903.7d Rent Determination Policies
 - ___ 903.7h Demolition and Disposition
 - ___ 903.7k Homeownership Programs
 - ___ 903.7r Additional Information
 - A. Progress in meeting 5-year mission and goals
 - ___ B. Criteria for substantial deviation and significant amendments
 - ___ C. Other information requested by HUD
 - ___ 1. Resident Advisory Board consultation process
 - ___ 2. Membership of Resident Advisory Board
 - ___ 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
 6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101

et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For a PHA Plan that includes a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.

19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Troy Housing Authority
PHA Name

NY012
PHA Number/HA Code

____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

Annual PHA Plan for Fiscal Year 2022

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director: Deborah A. Witkowski

Name of Board Chairman: Susan J.W. Steele



Signature

Date

 10/15/21

Signature

Date

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. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Civil Rights Certification
(Qualified PHAs)

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

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning January 1, 2022 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

Troy Housing Authority

NY012

PHA Name

PHA Number/HA Code

I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director: **Deborah A. Witkowski**

Name of Board Chairperson: **Susan J.W. Steele**

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

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

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

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

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

I, Patrick Madden, the Mayor
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2020-2024 and/or Annual PHA Plan for fiscal year
2022 of the Troy Housing Authority is consistent with the
PHA Name

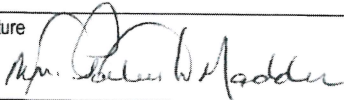
Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing
 Choice or Assessment of Fair Housing (AFH) as applicable to the

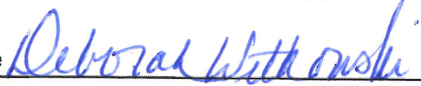
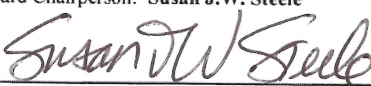
City of Troy, New York
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State
 Consolidated Plan: **The Troy Housing Authority (THA) 2022 Annual Plan addresses needs identified in the City of Troy's
 most recent Consolidated Plan; specifically, NA-10 Housing Needs and NA-35 Public Housing Needs by providing and
 maintaining affordable housing resources (examples are the revitalization of Martin Luther King Apartments, the planned
 redevelopment of Taylor Apartments and Fallon Apartments and the on-going and planned improvements at all other sites).
 The THA Plan also address several strategic plans of the City of Troy. These include SP-50 Public Housing Accessibility and
 Involvement, by increasing the number of accessible units and promoting resident involvement; and SP-55 Barriers to
 Affordable Housing by providing economic subsidies to those most in need of affordable housing. Finally, the THA Plan
 outlines their commitment to carrying out the duty to affirmatively further fair housing as guided by the Analysis of
 Impediments (AI) to Fair Housing identified by the City of Troy and expresses how THA addresses those impediments.**

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and
 statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Patrick Madden	Title Mayor
Signature 	Date 10-04-2021

Name of Executive Director: Deborah A. Witkowski	Name Board Chairperson: Susan J.W. Steele
Signature  Date	Signature  Date 10/15/21

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching
 existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and
 respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.



Administrative Offices

One Eddy's Lane
Troy, NY 12180

Phone: (518) 273-3600
Fax: (518) 274-6633

2022 AGENCY PLAN PUBLIC HEARING, CHALLENGED ELEMENTS AND OTHER INPUT

September 20, 2021 at 5:00PM at THA Administrative Offices

Notes From Public Hearing:

Meeting was held as publicly announced on the Troy Housing Authority website and in the Legal Notice of The Record on August 4, 2021. Meeting was called at 5:00PM at the THA Administrative Offices. No one from the public attended. Meeting concluded at 5:15PM.

Other Input Methods:

- Troy Housing Authority representatives serve on the Rensselaer County Homeless Services Collaborative providing updates on Troy Housing Authority at each meeting.
 - This has resulted in collaborations relative to applications for Mainstream, VASH and EHV vouchers.
- Troy Housing Authority representatives participate in activities related to the City of Troy and Rensselaer County's response to HUD's Mayoral Challenge to end Veterans Homelessness.
- Troy Housing Authority representatives serve on the County Mental Health Community Advisory Board.
- Troy Housing Authority representatives work with the City of Troy, Rensselaer County and Community Agencies on ways to serve our community.
 - This has resulted in collaborations with The Ark, Inc., and the Boys and Girls Club of the Capital District relative to providing programs and services to families of school aged children; The Regional Food Bank of the Capital District relative to providing food resources to seniors and families; the Commission on Economic Opportunity relative to providing services to families; Troy Look, Inc. relative to providing positive programming for youth to address and prevent gang activity, violence and other criminal behavior; TRIP, Inc. regarding Homeownership Opportunities and numerous other community agencies.
- Troy Housing Authority staff attend neighborhood association meetings and host such meetings in our community centers as requested.
- Troy Housing Authority website and Facebook page offer opportunities for public input. This resulted in one comment. On September 20, 2021 the Troy Housing Authority posted on Facebook that we were receiving \$2M from the City of Troy in American Recovery Act funding to demolish Taylor 1& 2 and initiate the revitalization of the entire Taylor Apartments site. This prompted a community member to post "And they will be wrecked just like the Taylor buildings were and who is going to Police people when they find out they cannot smoke in the buildings." Staff directly messaged the poster saying: "... I am sorry that you feel that way. Do you have specific concerns about Taylor Apartments that you could share? Bear in mind that Taylor 1 & 2 have been vacant for quite some time. We continue to strive to provide the tenants in Buildings 3 & 4 with safe, decent and affordable housing. We also do address violations of our smoking policy whenever we are aware of issues." Poster replied back saying "Thank you so much and yes we do need affordable housing if I in need of further information I will email you thank you so much."

*APARTMENTS UNDER MANAGEMENT: Conway Court ♦ Corliss Park ♦ Arnold E. Fallon
Grand Street ♦ Griswold Heights ♦ Edward A. Kane ♦ John F. Kennedy ♦ Martin Luther King
Margaret W. Phelan ♦ Catherine M. Sweeney ♦ John P. Taylor ♦ Section 8 Rental Assistance*



RESIDENT ADVISORY BOARD (RAB) MEETING

COMMENTS FROM MEETING ON SEPTEMBER 23, 2021

Meeting Participants

PRESENT	REPRESENTING
Virginia Clark	REACT President, Taylor Apartments Tenant
Deborah Ward	REACT Vice President, Griswold Heights Tenant
Darlene Gentry	REACT Secretary/Treasurer, Griswold Heights Tenant, Works at Conway Court
Nancy Edwards	REACT Director, former Corliss Park tenant
Thomas Hulihan	THA Director of Planning and Program Development

* REACT, Inc. (The Resident Empowered Action Council of Troy) is the Citywide Resident Organization for all residents.

The 2022 Troy Housing Authority (THA) Agency Plan, the Capital Fund Program Activities and Plans and the Wish List created by Staff for MDG regarding the NYS Preservation Opportunity Program were reviewed and discussed. The RAB offered the following comments, questions and observations:

Initial discussion focused on the new plans for the Taylor Apartments renovations. RAB members wanted to know if Taylor 4 residents knew about the new plans that involved a larger building at the Taylor 1 & 2 site to accommodate all the tenants in Taylor 3 and 4. It was explained that the new plans were discussed at a well-attended meeting on September 9, 2021, the plans have been posted on the THA website and more meetings will be occurring. RAB members also noted there are many elderly tenants in Taylor 3 and 4 and it would be ideal to locate them in an area of the building without a lot of large families. RAB members also indicated that two elevators would be best for the new building and non-stackable washers and dryers in the units would be preferred.

Other site specific concerns raised were screens for the balcony doors at Conway Court.

Regarding the MDG and the NYS Preservation Opportunity Program RAB members were assured there would be site meetings to discuss plans with tenants and get their input. RAB members suggested the following ideas:

- Outside storage for bikes and outdoor equipment
- Tenant controlled heating and cooling
- Gathering benches and play areas
- Wayfinding and other site signs
- Non-stackable washer and dryer hook ups in apartments

Finally, the possible need to relocate the REACT Pantry so that the space could be converted back to two handicapped accessible apartments was discussed. It was suggested that THA and MDG might work with REACT on an alternative method of pantry service delivery. One idea suggested was a smaller storage facility and groceries being delivered to sites when requested by tenants rather than having all tenants go to Grand Street to obtain groceries. RAB members were skeptical, especially regarding current staffing, available equipment and funding. They were encouraged to be open to new possibilities and assured that there would be time to plan for any changes in service delivery.

COVERED SITES	# UNITS	08/2012 AVERAGE INCOME	08/2013 AVERAGE INCOME	07/2014 AVERAGE INCOME	07/2015 AVERAGE INCOME	07/2016 AVERAGE INCOME	07/2017 AVERAGE INCOME	7/2018 AVERAGE INCOME	07/2019 AVERAGE INCOME	8/2020 AVERAGE INCOME	8/2021 AVERAGE INCOME
Corliss-Fallon AMP	224	\$13,610.00	\$14,201.53	\$15,084.00	NA	NA	NA	NA	NA	NA	NA
CorlissPark	184				\$16,340.00	\$15,887.00	\$17,420.00	\$19,682.00	\$20,751.86	\$20,774.31	\$21,448.58
Taylor 3&4	136	\$13,966.00	\$16,071.30	\$15,853.00	\$16,707.00	\$16,881.00	\$17,953.00	\$17,477.00	\$17,988.57	\$16,814.53	\$17,303.55
Phelan-Sweeney AMP	113	\$15,251.00	\$18,751.46	\$16,372.00	\$17,763.00	\$18,562.00	\$18,722.00	\$18,600.00	NA	NA	NA
Phelan Court	88								\$20,856.78	\$17,386.62	\$20,449.26
Sweeney Apartments	24								\$19,278.03	\$19,118.66	\$24,258.72
Martin Luther King AMP	124	\$15,671.00	\$20,548.05	\$17,722.00	NA	NA	NA	NA	NA	NA	NA
MLK-Fallon AMP	164				\$16,920.00	\$19,165.00	\$18,881.00	\$20,832.00	NA	NA	NA
Martin Luther King Phase I	46										
Martin Luther King Phase II	58								\$20,314.82	\$24,501.39	\$16,856.25
Fallon Apartments	40								\$25,273.13	\$22,792.63	\$17,561.74
Kane-Conway-Grand AMP	143	\$17,739.00	\$16,519.60	\$17,575.00	\$17,674.00	\$18,705.00	\$18,770.00	\$19,241.00	NA	NA	
Kane Apartments	60								\$17,334.90	\$16,357.69	\$16,267.07
Conway Court	41								\$18,036.90	\$16,369.75	\$17,188.71
Grand Street	42								\$23,774.00	\$19,831.16	\$19,394.93
Guenette Apartments	8								\$15,448.29	\$15,312.88	\$20,205.43
Griswold AMP	390	\$14,682.00	\$14,893.27	\$15,588.00	\$15,606.00	\$17,296.00	\$18,130.00	\$17,236.00	\$18,986.89	\$18,770.10	\$18,710.73
Taylor 1&2	143	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	Vacant	
THA AVERAGE		\$14,943.00	\$16,115.60	\$16,068.00	\$16,530.00	\$17,582.00	\$18,201.00	\$18,348.00	\$20,025.23	\$19,346.07	\$19,360.71
85%		\$12,690.50	\$13,698.26	\$13,657.80	\$14,050.50	\$14,944.70	\$15,470.85	\$15,595.80	\$17,021.45	\$16,444.16	\$16,456.60
115%		\$17,184.45	\$18,532.94	\$18,478.20	\$19,009.50	\$20,219.30	\$20,931.15	\$21,102.20	\$23,029.01	\$22,247.98	\$22,264.81
The final rule to deconcentrate poverty identifies covered developments as general occupancy developments with more than 100 units. For 2021 all covered sites are within the proscribed income band. No action is necessary at this time to address this matter. There is one uncovered site with less than 100 units that is above the band, Sweeney Apartments with 24 units. This site has larger units with multiple earners. There is also one uncovered site below the band, Kane Apartments. This site is a 60 unit building for senior citizens living on "fixed incomes" (pensions, social security, etc.).											

**Troy Housing Authority
Admissions & Continued Occupancy Policy
Exhibit K - Deconcentration Policy**

COMMITMENT / GOAL

To achieve a healthy mix of incomes in public housing developments by attracting and retaining higher income families and by working toward deconcentration of poverty.

**DECONCENTRATION OF POVERTY AND INCOME-MIXING
[PER 24 CFR 903.1 AND 903.2]**

The admission policy is designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [per 24 CFR 903.7(b)]. The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

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

STEPS FOR IMPLEMENTATION [PER 24 CFR 903.2(C)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the Troy Housing Authority will comply with the following steps:

Step 1. The Troy Housing Authority will determine the average income of all families residing in all the PHA's covered developments.

Step 2. The Troy Housing Authority will determine the average income of all families residing in each covered development without adjusting for unit size on an annual basis.

Step 3. The Troy Housing Authority will then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1.

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

Step 4. The Troy Housing Authority will then determine whether covered developments having average incomes outside the EIR are consistent with its local goals and annual plan and document it accordingly as part of the annual plan process.

Step 5. Where the income profile for a covered development having average incomes outside the EIR is not explained or justified in the annual plan submission, the Troy Housing Authority will include in its admission policy its specific plan to provide for deconcentration of poverty and income mixing.

DECONCENTRATION PLAN

Depending on current circumstances when the need for a deconcentration plan arises, the deconcentration plan may include, but is not limited, to the following:

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

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

This policy shall not be construed to impose or require any specific income or racial quotas for any public housing development owned by the PHA.

TRANSFER REQUESTS AS RELATED TO DECONCENTRATION GOALS

If subject to deconcentration requirements, the Troy Housing Authority will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.