



PHA PLAN

FY 2022

OCTOBER 1, 2021

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.						
A.1	PHA Name: Lake County Housing Authority PHA Code: IL056 PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2021 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 495 Number of Housing Choice Vouchers (HCVs) 3217 Total Combined Units/Vouchers 3712 PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission						
<p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>							
<input type="checkbox"/> 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.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): See Attachment A Section B.1 (b)</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. See Attachment B Section B.1 (c)</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan. See attachment C B.2(a)</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment D B.3</p>
B.4	<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 checked="" type="checkbox"/></p> <p>(b) If yes, please describe: N/A</p>

B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. See attachment E Section B.5</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(c) 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>N/A</p>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment F B.7</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: N/A</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>CFP 5 Year Action Plan for FY2019-2023 was submitted on 7/03/2019. It was approved on 7/09/2019</p>

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.

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. Annual Plan. All PHAs must complete this section.

B.1 Revision of 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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. ([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 community service and treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)](#)) 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 under Section 3 and FSS. ([24 CFR §903.7\(l\)](#))

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))

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. Should the PHA fail to define "significant amendment/modification", HUD will consider the following to be "significant amendments or modifications": a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

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: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing 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; 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. 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, and; 5) the number of units affected. 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. 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. 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 assistance under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32](#)

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](#). (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 Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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))
- B.4 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))
- B.5 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.6 Resident Advisory Board (RAB) comments.** If the RAB provided comments to 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)
- B.7 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.
- B.8 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. 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)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

- C.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

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 9.2 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.

VAWA Statement

9.1 5-Year and Annual Plans PHAs are required to include a brief description in their Annual Plan (as applicable) and 5-Year Plan of goals, activities, objectives, policies, programs, or services for child and adult victims of domestic violence, dating violence, sexual assault, or stalking, as required in 24 CFR 903.6(a)(3) and 24 CFR 903.7(m)(5) and described below. The VAWA Final Rule did not change this requirement. The availability of new PHA Annual and 5- Year PHA Plan templates that include the provisions of VAWA 2013 were first made available through Notice PIH 2015-18 (HA). HUD encourages reference to the PHA's Emergency Transfer Plan described in Section 12. All PHAs are required to submit a 5-Year Plan for HUD's approval (MTW PHAs excepted).

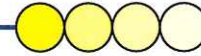
Annual PHA Plan Templates require PHAs to report any changes to Plan elements, which include VAWA provisions at 24 CFR 903.7(m)(5), under the safety and crime prevention element. The following information must be included:

- A statement of any domestic violence, dating violence, sexual assault, and stalking prevention programs; **Lake County Housing Authority is committed to preserving the peaceful enjoyment of all communities. LCHA is cognizant of actions that may pose a threat related to domestic violence, dating violence or stalking. In compliance with the Violence Against Women Act and Justice Department Reauthorization Action of 2013 (VAWA), LCHA will not terminate the lease or evict victims of criminal activity related to their victimization.**
- A description of 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; **LCHA refers families to A Safe Place (provider of services exclusively addressing domestic violence in Lake County, Illinois).**
- A description of any activities, services, or programs provided or offered by a PHA that help child and adult victims of domestic violence, dating violence, sexual assault, or stalking to obtain or maintain housing; and **LCHA partners with A Safe Place by contracting 37 Project Based Vouchers to developments owned by A Safe Place. In addition, LCHA has specialized**
- A description of any activities, services, or programs provided or offered by a PHA to prevent domestic violence, dating violence, sexual assault, or stalking, or to enhance victim safety in assisted families. **LCHA is seeking to partner with a local agency to provide bi-annual workshops to clients in addition to referrals.**



ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

PROPOSED CHANGES



Resident Advisory Board Meeting
March 9, 2021
Summary

Proposed Changes to the 2021 Admissions and Continued Occupancy Policy (ACOP),
Grievance Procedure, Pet Policy and Lease

Pursuant to executive order 2020-07 signed by Governor Pritzker and guidance provided by legal counsel, the Lake County Housing Authority conducted all of this Resident Advisory Board meeting by use of telephonic means without allowing a physical presence. Public access to this meeting was available as follows:

Join Zoom Meeting
Copy & Paste this Link: <https://us02web.zoom.us/j/83586877181>
or dial in: 312-626-6799
Meeting ID: 835 8687 7181

Based on what we know now about the coronavirus pandemic and prudent precautions as a result thereof, it is being conducted in a way to provide the maximum amount of protection to our staff and the residents. We apologize for any inconvenience to anyone.

The Resident Advisory Board Meeting for the Housing Authority of the County of Lake, Illinois, was held, March 9, 2021 at 1:00 p.m. for the purpose of receiving resident comment/questions on the proposed changes to the 2021 Admissions and Continued Occupancy Policy (ACOP), Grievance Procedure, Pet Policy and Lease.

Physically present at 33928 North US Highway 45, Grayslake, IL:

Deputy Director Ofelia Navarro
LCHA Consultant Mary Ann Russ
LCHA Consultant Corinne Jordan
Executive Secretary Valerie Rogers

Resident Advisory Board Members:
Carleen Wurster, Millview Manor
Ardelle Joy, Kuester Manor

RESIDENT ADVISORY BOARD MEETING

Deputy Director Ofelia Navarro called the session to order at 1:00 p.m.

WELCOME & INTRODUCTION

Ms. Navarro welcomed everyone and introduced LCHA staff and consultants. She noted no members of the Resident Advisory Board were present and announced the meeting would remain open for late arrivals.

RAB Meeting

3/9/21

Page 2 of 3

At 1:10 p.m. two (2) RAB members joined the Zoom meeting.

PURPOSE OF THE RAB MEETING

The purpose of the RAB Meeting is to accept comment from Program Participants on the proposed changes to the Admissions and Continued Occupancy Policy (ACOP), Grievance Procedure, Pet Policy & the Public Housing Lease.

REVIEW OF THE PROPOSED CHANGES BY MARY ANN RUSS

LCHA consultant Mary Ann Russ acknowledged the large amount of material to review and digest and offered to further contact any participant requesting additional explanation. She noted the comment period is open until April 1, 2021 and residents were still encouraged to submit comments. She stated all comments will be considered prior to submission to the Board of Commissioners.

She then reviewed each item listed in the Summaries and provided examples.

Admissions and Continued Occupancy Policy (ACOP).

Attachment A – Summary of Changes

Grievance Procedure

Attachment B – Summary of Changes

Pet Policy

Attachment C – Summary of Changes

Public Housing Lease

Attachment D – Summary of Changes

QUESTIONS AND/OR COMMENTS

During the discussion on proposed changes to the ACOP and removal of the Pet Policy from the ACOP to become a stand-alone policy, Ms. Russ stated assistance animals and/or emotional support animals to people with disabilities are not subject to the Pet Policy.

Resident comment explained her animal was originally a pet but then trained as a service animal.

Ms. Russ verified assistance animals and/or emotional support animals to people with disabilities are not subject to the Pet Policy or any associated fees.

During the discussion on proposed changes to the Pet Policy, resident comment asked if residents were not always required to submit the name of the person responsible for the continued care of their pet in their absence. Ms. Russ noted it will now be more uniformly enforced.

During the discussion on proposed changes to the Lease and moving the Smoke-Free Policy to the lease, resident comment asked about residents who decide to smoke pot. Ms. Russ explained it will depend on the state law. HUD's position is, this is federally assisted housing and under federal law marijuana is still illegal. For Housing Authorities in states where medical marijuana is permissible, people are encouraged to choose another way to get their medical marijuana without smoking it.

Resident comment asked about permitting visiting pets. Ms. Russ explained assistance animals and/or emotional support animals to people with disabilities are permitted to visit. Visiting pets are not allowed.

RAB Meeting

3/9/21

Page 3 of 3

RECAP OF NEXT STEPS BY OFELIA NAVARRO

All proposed revisions have been available for public review and comment for a forty-five (45) day period from February 15, 2021 and will be through April 1, 2021. They have been posted in all offices and on your building's bulletin board. The summaries and plans are also available on our website (www.lakecountyha.org)

LCHA will then review all comments for possible incorporation.

A Public Hearing will be held April 13, 2021 at 1:00 p.m. to receive comment from the public.

On April 15, 2021, the proposed changes will be presented to the Board of Commissioners for approval. If approved, the proposed changes are then forwarded to HUD for approval.

If all levels of review are approved, implementation of the changes is scheduled for August 1, 2021.

IF NO ADDITIONAL QUESTIONS AND/OR COMMENTS:

Ms. Navarro thanked everyone for their participation.

ADJOURNMENT

Ms. Navarro adjourned the session at 1:51 p.m.

Lake County Housing Authority

Summary of Changes to the LCHA 2016 ACOP

Page # 2016 ACOP	Page # 2021 ACOP	Change	Reason
6	1	Added "gender identity" and "sexual preference" to list of protected classes	Comply with HUD regulations
6	1	Deleted the term "handicapped" because the term "disabled" is preferred	Comply with HUD regulations
7	2 – 3	Expanded information on reasonable accommodations for persons with disabilities	Improve staff understanding of rules
8	2	Corrected definition of "undue burden"	Comply with HUD regulations
None	3 – 4	Added definition of "qualified Individual with a disability"	Improve staff understanding of rules
9 – 10	4 – 5	Corrected section on assistance to persons with "limited English proficiency"	Comply with HUD regulations
11	25	Corrected statement that income limits apply only at admission. There are now income limits for continued occupancy	Comply with HUD regulations
15	7	Corrected statement on family eligibility based on citizenship or eligible immigration status	Comply with HUD regulations
None	7	Added section on Affirmative Marketing	Comply with HUD regulations
29	7	Added section on Income Targeting Requirements	Comply with HUD regulations
18 - 21	10 - 11	Simplified the applicant screening standards	Eliminate redundancy
None	11	Added wording on notifying applicants of preliminary eligibility	Comply with HUD regulations
26 – 27	12	Residency Preference	Better meet the needs of families in Lake County Residency Preference

Page # 2016 ACOP	Page # 2021 ACOP	Change	Reason
None	13	Added wording on records management for criminal history reports	Comply with HUD regulations
28	14	Deleted wording permitting use of living room as a bedroom – not permitted in public housing	Comply with HUD regulations
26 – 32	15 - 18	Corrected contents of Tenant Selection and Assignment Plan. LCHA will continue to have site-based waiting lists.	Comply with HUD regulations
40 - 47	5	The procedural material on verifications is removed. This is not policy. LCHA will retain a verification procedure.	Remove extraneous verbiage.
	18 – 21	Added a section on Leasing Policy	Comply with HUD regulations
	26	Eliminated interim increases in rent (Between annual reexaminations unless: <ol style="list-style-type: none"> 1. Family has had an interim reduction in rent; or 2. Family has lied about income or deductions; or 3. An person with income has joined the family (with LCHA’s permission); or 4. Family had previously claimed zero income 	Provide incentive for families to increase their incomes
33 – 39	34 – 38	Updated and corrected definitions of Annual and Excluded Income	Comply with HUD regulations
47 – 48	40	Corrected Computation of Income Based Rent and Choice of Rent	Comply with HUD regulations
69 – 73	None	Removed the Grievance Procedure from the ACOP. This is a free-standing policy applicable to public housing tenants	Improve staff understanding of rules
74 – 76	Non	Removed the Pet Policy from the ACOP. This is a free-standing policy applicable to public housing tenants	Improve staff understanding of rules
77 – 86	41 – 50	Replaced glossary with definition of terms	Improve staff understanding of rules
89 - 94		Removed Reasonable Accommodation Guide from ACOP. It is retained as a procedure	Simplify ACOP

Page # 2016 ACOP	Page # 2021 ACOP	Change	Reason
97		Moved Smoke-Free Policy to the Lease	Where it belongs
98 – 100		Payback Policy is a procedure. Removed from ACOP	Retain as procedure
101 – 103		Removed Bedbug policy from ACOP.	Retain as procedure
104 – 117		Removed FSS Action Plan from ACOP	Retain as separate policy
118 – 119		Removed RAD material from ACOP	Retain as separate policy

Lake County Housing Authority

Summary of Changes to the Grievance Procedure

Old G.P. Page #	New G.P. Page #	Description of Change	Reason
14-1		Removed Informal hearings for Applicants and Informal hearings for Non-citizens.	These are procedures not policies.
14-9	1	The new Grievance Procedure conforms to the revised HUD regulation at 24 CFR part 966.5	Comply with HUD rules
		The new Grievance Procedure will use senior staff of the Housing Choice Voucher program as hearing officers	Improve timeliness of hearings

Lake County Housing Authority

Summary of Changes to the Pet Ownership Policy

Old Policy Page #	New Policy Page #	Description	Reason for Change
10-4	1	Simplified and clarified policy on assistance animals needed by persons with disabilities	Comply with HUD rules
10-7	2	Pet rules have been clarified and simplified	Comply with HUD rules
	3 – 4	A Pet Rule violation procedure has been added	Clarification
	5	A section on protection of the pet is added	Comply with animal protection laws
	6	A Pet Agreement is added as is a sample pet rule violation notice	Clarification

Lake County Housing Authority

Summary of Lease Changes

Old Lease Page #	New Lease Pge #	Description of Change	Reason for Change
Part II Pg 1	Part 1 Pg, 1	All data about the parties and premises have been moved to the new Part 1 of the Lease	Simplify lease execution process
	Part 1, Pg. 1	Added family member birthdates and last 4 digits of SS#	Better identification of all family members
	Part 1, Pg. 1	Both initial and full rent and utility allowance amounts are listed on Part 1	Comply with HUD rules
	Part 1, Pg. 1	Rent Choice (income-based or flat) is included	Comply with HUD rules
	Part 1, Page 1	Payment location is included	Improve understanding for residents
	Part 1, Pg. 2	Additional information on tenant-paid utilities and obligation to keep tenant-paid utilities turned on	Clarify tenant responsibilities
	Part 1, Pg. 2	Accessible features added	Comply with HUD rules
	Part 1, Pg. 2	Alternate form of communication or accessible format for written notices added	Comply with HUD rules
	Part 1, Pg. 3	Signature page added. All adult family members must sign	Improve lease enforceability
Part I	Part 2, Pg 5	Lease is automatically renewed unless modified or terminated by tenant or LCHA	Comply with HUD rules
	Part 2, Pg. 5	4 late payments are grounds for lease termination	Improve timely payment
Part 1,Pg. 2	Part 2, Pg 6	With few exceptions, maintenance charges will be based on cost of labor and materials	Capture actual cost of work
	Part 2, Pg. 6	Added charges for NSF checks	Capture actual cost of bad checks
	Part 2, Pg. 6	LCHA shall not charge for reasonable accommodations of persons with disabilities	Comply with HUD rules
	Part 2, Pg. 9	Added wording on "over-income" tenants	Comply with HUD rules
	Part 2, Pg.7	Children added by birth, adoption or court-awarded custody to family member will automatically be added to lease. All others require LCHA's written advance permission.	Comply with HUD rules

Old Lease Page #	New Lease Pge #	Description of Change	Reason for Change
Part 1, Pg 5	Part 2, Pg.8	LCHA will not increase rent between annual reexams for income increases in current job or in unearned income	Provide incentive for increased income to Tenant
	Part 2, Pg.8	Added wording on timing of rent changes	Clarification
	Part 2, Pg. 9	Added requirement to heat the unit when outside temperature is less than 55 degrees	Protect the unit
	Part 2, Pg.10	Added wording permitting LCHA to terminate the lease when tenant is unable to comply with its terms and conditions even with a reasonable accommodation	Protect the unit and tenant
	Part 2, Pg.10	Requirement that tenants register overnight guests. Maximum visit by any one guest is 14 overnights in 12 months. Longer visits require LCHA permission	Control problem of unauthorized occupants.
	Part 2, Pg.10	A tenant who is away from the unit without approval by LCHA for more than 30 days is to be considered permanently absent	Maximize use of unit
Part 1, Pg. 6	Part 2, Pg. 11	Transfer requirements expanded.	Comply with HUD rules
	Part 2, Pg.11	Requirement for LCHA to refrain from illegal discrimination	Comply with HUD rules
	Part 2, Pg. 12	New LCHA obligations added	Comply with HUD rules
	Part 2, Pg. 13	Added requirement not to bring used mattresses or other furniture to avoid bedbug infestation	Avoid bedbug infestation
Part 1, Pg 11	Part 2, Pg.24	All LCHA property is Smoke Free. Smoking is not permitted nor is use of tobacco in any form (smoke-free or vaping).	Comply with HUD rules
Part 1, Pg.11	Part 2, Pg.24	Community service rules clarified	Comply with HUD rules
Part 1, Pg.15	Part 2, Pg.20	Added grounds for lease termination: <ol style="list-style-type: none"> 1. Allowing unauthorized occupants 2. Refusal of a mandatory transfer 3. Refusal of access to unit 4. Failure to inform CMHA of new family members 5. Failure to comply with the pet policy 6. Breaching a repayment agreement 7. Failure to meet housekeeping standards 	Comply with HUD rules

Old Lease Page #	New Lease Pge #	Description of Change	Reason for Change
	Part 2, Pg.21	Added protection for VAWA victims	Comply with HUD rules
	Part 2, Pg.25 thru 29	Added House Rules	Protect the units and lease compliant tenants



HCV ADMINISTRATIVE PLAN CHANGES

RESOLUTION 2021-08

AMENDING THE HCV ADMINISTRATIVE PLAN

CHAPTER 4: UPDATING THE WAITING LIST

WHEREAS, LCHA's HCV Leadership is requesting to revise the Administrative Plan to expedite the annual waiting list update process; and

WHEREAS, by shortening the applicant response time from 60 business days to 15 business days, LCHA staff is less burdened by a prolonged, manual process of updating the waiting list and removing nonresponsive applicants from the waiting list; and

WHEREAS, it is the best interest of the community to finalize an accurate list of accessible applicants;

NOW, THEREFORE, BE IT RESOLVED, the following Sections are amended as follows; and

BE IT FURTHER RESOLVED, the amended Sections are effective 10/1/2020.

4-III.F. UPDATING THE WAITING LIST [24 CFR 982.204]

REMOVE:

The family's response must be in writing and may be delivered in person, or by mail. Responses should be postmarked or received by the PHA not later than 60 business days from the date of the update request.

If the family fails to respond within 60 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 30 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to PHA error.

REPLACE WITH:

The family's response must be in writing and may be delivered in person, email or by post mail. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the update request.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to PHA error.

RESOLUTION 2021-27

AMENDING THE HCV ADMINISTRATIVE PLAN

CHAPTER 16-III.B. INFORMAL REVIEWS & CHAPTER 5-I.B. BRIEFING

WHEREAS, LCHA's HCV Leadership is requesting to revise the Administrative Plan to add language regarding procedures for remote Briefings and Hearings/Informal Reviews; and

WHEREAS, HUD has required PHA's to add to their Administrative Plans procedures for conducting Briefings and Hearings/Informal Reviews via video calls and audio calls with written consent due to COVID-19;

NOW, THEREFORE, BE IT RESOLVED, the following Sections are amended as follows;
and

BE IT FURTHER RESOLVED, the amended Sections are effective 2/1/2021.

16-III. B. INFORMAL REVIEWS

New language is indicated in red. No language is being deleted.

ADD to the End of 16-III.B

LCHA Procedure for Conducting Informal Reviews & Hearings
Due to COVID-19 [PIH 2020-32]

LCHA will allow the use of post mail, electronic mail, telephone, and video call to conduct remote Informal Reviews & Hearings. LCHA will continue to record hearings and request written consent from the family to conduct hearings via audio calls.

5-I.B. BRIEFING [24 CFR 982.301]

New language is indicated in red. No language is being deleted.

Add to the End of 5-I.B.

LCHA Procedure for Conducting Briefings Due to COVID-19 [PIH 2020-32]

LCHA will allow the use of post mail, electronic mail, telephone, and video call to conduct remote hearings. LCHA will continue to record hearings and request written consent from the family to conduct hearings via audio calls.

RESOLUTION 2021-28

AMENDING THE HCV ADMINISTRATIVE PLAN

CHAPTER 11-II.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

WHEREAS, LCHA's HCV Leadership is requesting to revise the Administrative Plan to specify circumstances for adding adult household members; and

WHEREAS, by clarifying the exceptions in which LCHA will add adult household members, staff and residents understand the eligibility process for approving adult household members and the conditions for denying the addition of adult household members;

NOW, THEREFORE, BE IT RESOLVED, the following Sections are amended as follows;
and

BE IT FURTHER RESOLVED, the amended Sections are effective 2/1/2021.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

New language is indicated in red. Deleted language is shown in ~~strikeout~~.

REMOVE:

~~When any new family member is added, the PHA must conduct a reexamination to determine any new income or deductions associated with the additional family member and to make appropriate adjustments in the family share of the rent and the HAP payment [24 CFR 982.516(e)].~~

REPLACE WITH:

LCHA Policy

LCHA will not approve the addition of an adult except under consideration for reasonable accommodation, marriage, or court awarded custody. Adults added under these circumstances are still subject to meeting LCHA's eligibility criteria and documentation requirements.

If a change in family size causes a violation of Housing Quality Standards (HQS) space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

RESOLUTION 2021-29

AMENDING THE HCV ADMINISTRATIVE PLAN

CHAPTER 8-I.C. LIFE-THREATENING CONDITIONS

WHEREAS, LCHA’s Housing Quality Standards (HQS) Leadership is requesting to amend the HCV Administrative Plan to eliminate the EMERGENCY REPAIRS subsection and include some of those deficiencies under Chapter 8-I.C. LIFE-THREATENING CONDITIONS; and

WHEREAS, by eliminating the EMERGENCY REPAIR section, which allots five (5) business days for correction, those deficiencies within the EMERGENCY REPAIR section considered serious and thus moved to LIFE THREATENING will consequently require correction within 24-hours;

NOW, THEREFORE, BE IT RESOLVED, the following Sections are amended as follows;
and

BE IT FURTHER RESOLVED, the amended Sections are effective 4/1/2021.

New language is indicated in red. Deleted language is shown in ~~strikeout~~.

AMEND:

8-I.C. LIFE-THREATENING CONDITIONS

HUD requires the PHA to define life-threatening conditions and to notify the owner or the family (whichever is responsible) of the corrections required. The responsible party must correct life-threatening conditions within 24 hours of PHA notification.

LCHA Policy

The following are considered life-threatening conditions:

Inadequate heat **when temperature is below 60 degrees Fahrenheit**

Natural gas leak

Electrical outlet smoking or sparking

Exposed electrical wires which could result in shock or fire

Smoke/Carbon Monoxide detectors not functioning

Refrigerator not working properly

Utilities not in service

Broken locks on first floor doors or windows

Security risks, such as broken doors or windows

Absence of a functioning toilet in the unit

Other conditions which pose a threat to the health or safety of occupants as determined by the HQS Inspector

EMERGENCY REPAIRS

~~Emergency repairs must be corrected within Five (5) working days:~~

~~Smoke detector~~

- ~~_____ Carbon Monoxide Detector~~
- ~~_____ Refrigerator~~
- ~~_____ Range and oven~~
- ~~_____ Plumbing fixtures~~
- ~~_____ Hot or cold water~~
- ~~_____ No electricity~~
- ~~_____ Broken lock on first floor window or door~~
- ~~_____ Security risks such as broken doors or windows~~
- ~~_____ Other conditions which pose a threat to the health or safety as determined by HQS inspector.~~

3. ~~Non-emergency repairs must be corrected within 30 days:~~

- ~~_____ Any condition that jeopardizes the security of the unit~~
~~Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling~~
- ~~_____ Natural or LP gas or fuel oil leaks~~
- ~~_____ Any electrical problem or condition that could result in shock or fire~~
- ~~_____ Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit~~
- ~~_____ Utilities not in service, including no running hot water~~
- ~~_____ Conditions that present the imminent possibility of injury~~
- ~~_____ Obstacles that prevent safe entrance or exit from the unit~~
- ~~_____ Absence of a functioning toilet in the unit~~
- ~~_____ Inoperable smoke detectors~~

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II.G.

If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.

The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

RESOLUTION 2021-30

AMENDING THE HCV ADMINISTRATIVE PLAN

CHAPTER 8-II.B. INITIAL HQS INSPECTION

CHAPTER 8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR
UNITS UNDER HAP CONTRACT

CHAPTER 8-II.G. ENFORCING OWNER COMPLIANCE

WHEREAS, the LCHA's Housing Quality Standards (HQS) Leadership is requesting to amend the HCV Administrative Plan to refine and more appropriately reposition information that applies to:
Chapter 8-II.B. Initial HQS Inspection,
Chapter 8-II.F. Inspection Results And Reinspections For Units Under HAP Contract, and
Chapter 8-II.G. Enforcing Owner Compliance; and

WHEREAS, the following reordering is necessary to promote clarity and uniformity in enforcement on all subjects where uniformity is deemed desirable and practicable;

NOW, THEREFORE, BE IT RESOLVED, the following Sections are amended as follows;
and

BE IT FURTHER RESOLVED, the amended Sections are effective 4/1/2021.

New language is indicated in red. Deleted language is shown in ~~strikeout~~.

AMEND:

8-II.B. INITIAL HQS INSPECTION

Inspection Results and Reinspections

LCHA Policy

A re-inspection will be scheduled ~~of~~ **to allow** the owner to correct any failing HQS items. The notification will state **what repairs must be completed, and** when the repairs must be completed **by**. ~~when the HAP will be abated and when the contract will terminate.~~ If the inspector goes to the unit and if the failed items do not pass on that scheduled inspection, no further scheduling will be made. ~~If an owner notifies LCHA that the failed items are now corrected and requests a second re-inspection, a \$40.00 fee will be incurred. An inspection will be done on the corrected items after the owner submits a \$40.00 cashier's check or money order to the Central Office in Grayslake.~~

(Delete from here & Relocate the following paragraph to Chapter 8-II.F. Inspection Results And Reinspections For Units Under HAP Contract, Reinspections, insert as par. 3.)

~~If the landlord or tenant calls or notifies LCHA prior to the scheduled re-inspection to cancel the appointment, LCHA will only schedule one more inspection. If the unit fails for any reason on the second scheduled re-inspection date (repairs not done, no one home, not able to gain access to the unit) the \$40.00 fee will be incurred. The second re-inspection date must fall within the specified time frame for correction or approved extension.~~

(Eliminate the following paragraph.)

~~If the participant fails to correct the HQS failed items that are family-caused after proper notification has been given, the LCHA will terminate assistance for the family.~~

(Delete from here & Relocate the following three (3) paragraphs (minus one sentence) to Chapter 8-II. G. Enforcing Owner Compliance, HAP Abatement, insert as par. 3, 4, 5.)

When a unit fails to meet HQS and the owner has been given an opportunity to correct the deficiencies but has failed to do so within the required time frame, the HAP for the dwelling unit will be abated.

For Life Threatening defects, the HA will abate payment beginning the day after the 24-hour period. (Eliminate the following sentence.) For Emergency repairs the HA will abate payment beginning the day after the 5-day period. The Housing Authority will recoup money previously paid for the period in abatement. The HAP contract will be terminated the 1st of the month following abatement. If the deficiencies are corrected prior to the HAP contract termination, rent will resume the following day. There will be no way to recoup monies abated because the unit failed Housing Quality Standards.

For non-emergency HQS deficiencies, the HA will abate payment on the 1st of the month following the 30-day notice time frame. The HAP contract may be terminated any time after abatement, but no later than the end of the current contract.

(Eliminate the following paragraph.)

At the sole discretion of the Lake County Housing Authority, written extensions of up to 30 days may be granted to permit an owner to complete repairs if the owner has made a good faith effort to initiate repairs. If repairs are not completed within 60 days after the initial inspection date, the LCHA will abate the HAP payment and cancel the HAP contract for owner non-compliance. Appropriate extensions will be granted beyond the 60 days if a severe weather condition exists for such items as exterior painting and outside concrete work for porches, steps, and sidewalks.

(Delete from here & Relocate the following paragraph to Chapter 8-II. G. Enforcing Owner Compliance, HAP Abatement, insert as par 6.)

For tenant caused HQS deficiencies, the owner will not be held accountable and the rent will not be abated. The tenant is held to the same standard and timeframes for correction of deficiencies as owners. If repairs are not completed by the deadline, the Lake County Housing Authority will send a notice of termination to both the tenant and the owner. The tenant will be given the opportunity to request an informal hearing.

(Eliminate the following paragraph.)

If a landlord does not provide a current Rental Occupancy Permit when required by the local municipality, the HA will abate payment at the renewal. The HAP will remain on hold for a maximum of 180 days. HUD regulation 982.455 states the HAP contract automatically terminates 180 calendar days after the last housing assistance payment to the owner. If no current Occupancy Permit is provided within the first 90 days, the tenant will be processed to move.

8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Reinspections

LCHA Policy

(Insert as par. 3)

If the landlord or tenant calls or notifies LCHA prior to the scheduled re-inspection to cancel the appointment, LCHA will only schedule one more inspection. If the unit fails for any reason on the second scheduled re-inspection date (repairs not done, no one home, not able to gain access to the unit) the \$40.00 fee will be incurred. The second re-inspection date must fall within the specified time frame for correction or approved extension.

8-II.G. ENFORCING OWNER COMPLIANCE

HAP Abatement

LCHA Policy

(Insert as par. 3, 4, 5)

When a unit fails to meet HQS and the owner has been given an opportunity to correct the deficiencies but has failed to do so within the required time frame, the HAP for the dwelling unit will be abated.

For Life Threatening defects, the HA will abate payment beginning the day after the 24-hour period. The Housing Authority will recoup money previously paid for the period in abatement. The HAP contract will be terminated the 1st of the month following abatement. If the deficiencies are corrected prior to the HAP contract termination, rent will resume the following day. There will be no way to recoup monies abated because the unit failed Housing Quality Standards.

For non-emergency HQS deficiencies, the HA will abate payment on the 1st of the month following the 30-day notice time frame. The HAP contract may be terminated any time after abatement, but no later than the end of the current contract.

(Insert as par. 6)

For tenant caused HQS deficiencies, the owner will not be held accountable, and the rent will not be abated. The tenant is held to the same standard and timeframes for correction of deficiencies as owners. If repairs are not completed by the deadline, the Lake County Housing Authority will send a notice of termination to both the tenant and the owner.

RESOLUTION 2021-39

AMENDING THE HCV ADMINISTRATIVE PLAN

SECTION 6-I.G. ASSETS – CHECKING & SAVINGS ACCOUNTS

WHEREAS, LCHA's Administrative Plan requires revision to foster a more cohesive, comprehensive and thorough process for determining income and subsidy; and

WHEREAS, if approved, the current Section, titled TYPES OF ASSETS, subsection titled CHECKING AND SAVINGS ACCOUNTS would more accurately reflect how to determine a participant's value in her/his checking and/or savings account;

NOW, THEREFORE, BE IT RESOLVED, the following Section is amended as follows; and

BE IT FURTHER RESOLVED, the amended Section is effective 4/1/2021.

New language is indicated in red. Deleted language is shown in ~~strikeout~~.

6-I.G. ASSETS

Types of Assets

Checking and Savings Accounts

REMOVE:

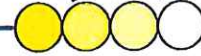
LCHA Policy

~~In determining the value of checking accounts, the PHA will use the ending balance of the most recent bank statement. In determining the anticipated income from an interest-bearing savings or checking account, the PHA will use the average of the beginning balance and ending balance of the most recent bank statement, multiply the value of the account by the current rate of interest paid on the account.~~

REPLACE WITH:

LCHA Policy

In determining the value of checking accounts, the LCHA will **take the most recent checking statement and add the beginning balance and the ending balance and divide by 2 to get an average daily balance. In the instance when a checking account statement indicates an AVERAGE BALANCE, then that should be used instead. For savings accounts, use the ending balance on the most recent bank statement. For interest bearing checking/savings accounts, take the ending balance of the most recent statement as the cash value. Include the interest rates/return rates.**



Attachment B
Section B.1 (c)

LCHA De-Concentration Policy:

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

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

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

De-concentration Incentives

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

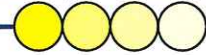
Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

Offer of a Unit

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

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

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



**Attachment C
Section B.1(c)**

STATEMENT OF SUBSTANTIAL DEVIATION AND SIGNIFICANT AMENDMENT/MODIFICATION

In accordance with HUD regulations in 24 CFR 903.7(r) and 24 CFR 905.3, the Lake County Housing Authority (LCHA) has defined the basic criteria that will be used for determining:

- Substantial deviation from its 5-Year Plan;
- Significant amendment or modification to the 5-Year and Annual Plans; and
- Significant amendment or modification to the Capital Fund Program (CFP) 5-Year Action Plan.

Amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the LCHA will require formal approval from the Board of Commissioners. Prior to implementing changes that meet such criteria, the LCHA will submit for HUD's approval a revised plan(s) that meets full public process requirements.

Criteria for defining "Substantial Deviation" from the 5-Year Plan

- A change in federal law takes effect and, in the opinion of LCHA, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree
- All amendments, deviations, or modifications to the agency plan which fundamentally alter the mission, goals, objectives or plans of the LCHA

Criteria for defining "Significant Amendment or Modification" to the 5-Year and PHA Annual Plans

- Changes to rent, admission and/or occupancy policies, or the organization of waiting lists that will impact more than 10% of applicants or households assisted under agency programs

Criteria for defining "Significant Amendment or Modification" to the CFP 5-Year Action Plans

- Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals will be considered significant amendments to the CFP 5-Year Action Plan.



Attachment C
Section B.1(c)

- Addition of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action plan that exceeds \$100,000.00.

Exceptions

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification

- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification
Discretionary or administrative amendments consistent with the LCHA's stated overall mission and objectives will not be considered substantial deviations or modifications

Repositioning Assistance Panel Discussion – Lake County Housing Authority (IL056)

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

Lake County Housing Authority must move away from the policies and programs of the past and develop an innovative approach that is more responsive to the community; that anticipates the public housing essentials of the future while addressing current needs.

In devising a strategic plan, LCHA will examine:

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

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

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

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

Background

LCHA Units: 496 (based on 2018 RAD Rent table)

The Lake County Housing Authority wants to explore options for converting its elderly/disabled development, consisting of 207 units. Additionally, the LCHA wants to know what choices under the options we have for two scattered-site properties, totaling 161 single-family homes.

The Repositioning Panel advises that LCHA has several options to consider for its portfolio and could do them in different phases.

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

- Submit a Section 18 application under Scattered Sites if the units meet the definition of scattered sites. LCHA would have to demonstrate they are unable to maintain the units as public housing. The units must also be in non-contiguous buildings with four or fewer units. Additionally, the LCHA must have a relocation plan with the option for residents to remain using Project-Based Vouchers (PBVs) or Housing Choice Voucher (HCV).
-

Attachment C Section B.2 (a)

- LCHA could dispose of the properties to a third-party entity under state law, including a non-profit, and could retain ownership or control. The options discussed during the call included:
 - Selling the property at Fair Market Value and use the proceeds to maintain other LCHA PH properties
 - Disposing of the property below fair market (Commensurate public benefit. Use restriction required)
 - Creating a local Homeownership program under Section 32 (Exploring under AIM North Nonprofit).
- TPVs are available for all units occupied by assisted tenants within the previous 24-months at the HUD's Special Application Center (SAC) approval time.
 - Eligible to project-based 100% of property; however, families could request a voucher to move after one year.
 - LCHA has seven (7) over-income families that would not be eligible for Tenant Protection Voucher (TPV) under Section 18. LCHA would have to provide comparable housing for the seven families.
- Under this option, the Panel advised LCHA can submit one application for all the units at one time. If LCHA plans to dispose at different times, may consider putting properties in batches and submitting separate applications.

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

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

Remaining 175 Units

- If LCHA submits applications based on the LCHA one and LCHA two options, they would have 175 PH units remaining and consider submitting an application under Streamlined Voluntary Conversion (SVC) for the remainder of its inventory. Under SVC, conversion to PBV requires tenant consent. Tenants have the right to remain in their unit with the TPV, or take the TPV and rent in the private market, or accept a PBV and remain in the unit (must be in writing)
- LCHA could remove the remaining 175 units via the RAD/Section 18 Close-out Blend, where 125 units convert through RAD, and the last 50 units are converted through Section 18. The LCHA would project-based the TPVs obtained for the 50 Section 18 units, and the LCHA would not need tenant consent.

Additional Takeaways:

- LCHA wants to continue assessing what options are best for the community and the families' needs before they consider selling units at fair market value or PBV.

Attachment C Section B.2 (a)

- Only applications submitted through Section 18 are eligible for ARF and DDTF. RAD and Streamlined Voluntary Conversions are not eligible.
- Under RAD, LCHA can maintain PH reserves after conversion. Under Section 18 or SVC, LCHA has up until the transaction's closing to spend down any PH reserves. LCHA cannot use PH reserves to support of any Section 8 projects.
- The LCHA is in the process of writing a Request for Proposal (RFP) for a (Physical Needs Assessment (PNA)).

Next Steps:

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

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 02/29/2016

Civil Rights Certification
Annual Certification and Board Resolution

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

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Lake County Public Housing

IL056

 PHA Name

 PHA Number/HA Code

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

Title

Dr. H Lee Jordan Jr.

Chairman

Signature

Date

Progress Report

Lake County Housing Authority (LCHA) continues to provide its low rent program residents with safe and well maintained housing and services.

The quality of documentation and physical work remains a top priority of the agency. Our Resident Services Coordinator provides services to elderly and disabled residents to increase their independence and well-being. Which has never been more important than during the Covid 19 pandemic. Some of the activities include, wellness checks, regular surveys to identify and address needs, distribution of food and PPE. Our Resident Service Coordinator have gotten very creative in finding ways to ensure the safety and wellbeing of our residents by providing door hangers to alert staff when all is well. Also hosting activities via Zoom, and assisting residents with access to Covid 19 testing and vaccinations, as well as other needed services.

The Authority has branched into the community to partner with many other agencies to provide needed services. Some partnerships include, but are not limited to Oak Street Health, Catholic Charities, and many others.

LCHA continues to administer its CHOICES (Choose Housing In Communities Empowering Self Sufficiency) program. This program encourages Voucher holders to choose units in defined opportunity areas.

The Brookstone and Regency at Coles Park {formerly Marion Jones Town homes} redevelopment project is nearly complete and 85% occupied. Former Marion Jones residents have been given the first opportunity to move into the newly completed community.

LCHA has received additional Family Unification Vouchers (FUP) to provide additional housing to families needing assistance to remain together and 40 additional Mainstream Vouchers which assist homeless non-elderly persons with disabilities with housing assistance.

In 2020, LCHA received a grant award from the Illinois Housing Development Authority in the amount of \$100,000. These funds allow us to address the needs of Homeowners and Renters in the Lake County area through our Housing Counseling Program.

Covid Housing Relief Program – LCHA partnered with Lake County, Illinois to distribute \$2,194,773.40 in rental and utility assistance to 2,087 residents in Lake County.

Federal Emergency Relief Assistance (FERA) – LCHA has responded to a Request for Partners issued by the County of Lake to distribute funds up to **\$2,000,000** (“Maximum Grant”) per partner, **under the FERA program**. LCHA is currently finalizing contract details and the execution of the contract is forthcoming.

Illinois Rental Payment Program – LCHA will be partnering with the Illinois Housing Development Authority (IHDA) to provide marketing and intake for their rental assistance program

These programs help to address the needs of Lake County residents and stabilize our communities.

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

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

I, Brenda O'Connell, the Community Development Administrator
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Lake County Housing Authority

PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the
Lake County, IL

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Lake County Consolidated Plan places high priority on affordable housing such as the housing Authority's low rent developments, providing priority to homeless population through Mainstream voucher program, and ensuring decent, safe, sanitary, and well maintained housing and services.

Participate in fair housing activities, advertise openings to Lake County residents in Spanish language.

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
Brenda O'Connell

Title
Community Development Administrator

Signature

Date

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning 2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Lake County Housing Authority

IL056

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2021

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **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

Title

Dr. H Lee Jordan Jr.

Chairman

Signature

Date