Streamlined Annual PHA Plan

(High Performer PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

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

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

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

Α.	PHA Information.					
A.1	PHA Type: High Perform PHA Plan for Fiscal Year Both PHA Inventory (Based on Ar Number of Public Housing (Interpretation of Total Combined 1190) PHA Plan Submission Type: Availability of Information. A PHA must identify the speciand proposed PHA Plan are averasonably obtain additional insubmissions. At a minimum, office of the PHA. PHAs are resident council a copy of their The PHA Plan and polices are Washington Park Community Collier Garden Apartments, 29 Voucher Program Office, 290 D'Agnolo Garden Apartments Johnston Garden Apartments, Freeport RAD Office, 524 We The Agency Plan and policies resident councils.	ginning: (MM/ anual Contribution PH) Units22 Annual Sul In addition to the fice location(s) was allable for insput formation of the PHAs must post strongly encourar PHA Plans. available for put Center, 3617 De 201 Searles Ave 1½ Searles Ave 1,806 Kocher Ave 1,516 South Blast Stephenson Sare also available	YYYY):04/01/2025_ ons Contract (ACC) units at time or	nual Submission nust have the elements listed bela Plan Elements, and all informat the PHA must provide informatindard Annual Plan but excluded each Asset Management Project in their official website. PHAs a 11102. 11102. 11103.	ow readily availation relevant to the from their stream (AMP) and main re also encourage	ne public hearing ablic may nlined office or central d to provide each
			Program(s) not in the	No. of Units in Each Program		
	Participating PHAs	PHA Code	ode Program(s) in the Consortia	Consortia	PH	HCV
	Lead PHA:					

•						
В.	Plan Elements					
B.1	Revision of Existing PHA Plan Elements.					
	(a) Have the following PHA Plan elements been revised by the PHA since its last Annual <u>PHA Plan</u> submission?					
		Other Policies the rams. Pention.	tegy for Addressing Housing Needs at Govern Eligibility, Selection, an			
	(b) If the PHA answered yes for any element, describe the revisions for each element below:					
	The PHA updated its policies to reflect current statutory and regulatory changes. The Financial Resources FYE 03/31/2025 are included with the Annual Plan.					
	(c) The PHA must submit its Deconcentration Policy for Field Office Review.					
	The Deconcentration Policy B.1.c. is included with the Annual Plan.					
B.2	Y N Mixed Finance Modern Mixed Finance Modern Demolition and/or Disport Conversion of Public F Conversion of Public F Conversion of Public F Mixed Finance Modern Mixed Finance Mixed Finance Mixed Finance Fi	ighborhoods. nization or Devo- position. Housing to Tena Housing to Proje s. Pacancies for M ograms (i.e., Ca e planned for the n thereof, owne ct under the sep used units and g ed Finance Mo the Westcott Ho Mainstream Vo	int Based Assistance. ect-Based Rental Assistance or Proj	ect-Based Vouchers under RAD rants or Emergency Safety and Sactivities. For new demolition acas applied or will apply for demoval process. If using Project-Base project basing would be consiste unities. No programs have been ion 22 Streamlined Conversion pand the Getty Garden program.	Security Grants). ctivities, describe olition and/or dised Vouchers (PB ent with the PHA determined at the program.	position approval Vs), provide the Plan.

В.3	Progress Report.				
	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.				
B.4.	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. Two ROCK (Resident Officer Community Keeper) Rockford Police Department residency homes were created to promote community safety and police relations. Awarded 25 Veterans Assisted Supportive Housing vouchers (VASH) and also made available to Stephenson County. The Rental Housing Support Program was increased and expanded to create mobility opportunity in Winnebago, Boone, Ogle, Jo Daviess, Dekalb and Stephenson Counties. WCHA became the housing authority representative to the Illinois Re-entry Task Force to impact against recidivism. WCHA became the housing authority representative to the Illinois Re-entry Temperature and the WCHA created are-entry demonstration program that became a model for the RHSP Re-Entry Demonstration Program. Awarded 55 RHSP Re-Entry Demonstration vouchers for Boone, Winnebago and Stephenson Counties. Awarded 15 RAD I vouchers for the Hosmer and Brewster rehalp program, recovered the program Tax Credits (LIHTCV) for the \$18 million rehal and new construction program of Westport Village. Awarded 16 RAD I vouchers for the Hosmer and Brewster rehalp program, recovered the program management, and was instrumental in an additional \$1.1 million in rehalb beyond the initial \$8 million rehalp program. Recovered and added an additional five homes to the Champion Park HOPE VI new construction and rehalp program. Recovered and added an additional five homes to the Champion Park program. Created the Wescott Homes program with five scattered site homes in the public housing program. Awarded 10 Resident Opportunities and Supportive Services program serving 104 families. The Family Self-Sufficiency Program is in the top five percentile of participating families for the State of Illinois. Awarded 10 RAM anistream vouchers for the Winnebago and Stephenson County area. Gained a 15 VASH voucher program for the Boone County Housing Authority (BCHA). Maintained HuD designated High Pe				
	See HUD Form 50075.2 approved by HUD on 12/13/21.				
B.5	Most Recent Fiscal Year Audit.				
	(a) Were there any findings in the most recent FY Audit?				
	Y N □ ⊠				
	(b) If yes, please describe:				
c.	Other Document and/or Certification Requirements.				
C.1	Resident Advisory Board (RAB) Comments.				
	(a) Did the RAB(s) have comments to the PHA Plan?				
	Y N □ ⊠				

	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials.
0.2	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.
C.3	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
	 (a) Did the public challenge any elements of the Plan? Y N □ ⊠
	If yes, include Challenged Elements.
D.	Affirmatively Furthering Fair Housing (AFFH).
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D.1	Affirmatively Furthering Fair Housing. Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.
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		Describe fair housing strategies and actions to achieve the goal	
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		Describe fair housing strategies and actions to achieve the goal	
		actions for Preparation of Form HUD-50075-HP	
Ar	nu	al Plan for High Performing PHAs	
A.	PHA	A Information. All PHAs must complete this section. (24 CFR §903.4)	
	A.1	Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing U or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information 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))	
В.	Plar	n Elements.	
	B.1	Revision of Existing PHA Plan Elements. PHAs must:	
		Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "y	es" box.

□ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing

If an element has not been revised, mark "no."

Needs. (24 CFR §903.7(a).

Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))
Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. 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 maintaining 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.
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)
☐ Homeownership Programs . A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).
□ Safety and Crime Prevention (VAWA). 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))
☐ Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)
☐ Significant Amendment/Modification . PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.
If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR \$903.23(b))
New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies 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. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance or
HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . (Notice PIH 2011-47)
Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program offices/public indian housing/programs/ph/hope6/mfph#4
Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected unit along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 1s of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm . (24 CFR §903.7(h))
Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:
http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.

B.2

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ($\underline{24\ CFR\ \$903.7(a)(2)(i)}$)

	Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) 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.
	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).
В.3	Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

- B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
- **B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

- C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan. Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).
- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

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

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

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

Public reporting burden for this information collection is estimated to average 7.02 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.