

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

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

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

A.	PHA Information.																																			
A.1	<p>PHA Name: <u>Jefferson County Housing Authority</u> PHA Code: <u>CO072</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2024</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Housing Choice Vouchers (HCVs) <u>1892</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.</p> <p>The Annual PHA Plan and Elements, including the MTW Supplement for the period starting January 1, 2024, are available at 11941 W 48th Ave, Wheat Ridge, CO 80033. Upon final approval from HUD, the Annual Plan and MTW Supplement will be posted on Jefferson County Housing Authority dba Foothills Regional Housing's website at www.foothillsrh.org under the Housing Choice Voucher Program page.</p> <p>PHA Consortia: (Check box if submitting a joint Plan and complete table below)</p> <table border="1"> <thead> <tr> <th data-bbox="180 1423 444 1472">Participating PHAs</th> <th data-bbox="444 1423 570 1472">PHA Code</th> <th data-bbox="570 1423 857 1472">Program(s) in the Consortia</th> <th data-bbox="857 1423 1122 1472">Program(s) not in the Consortia</th> <th data-bbox="1122 1423 1424 1472">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td data-bbox="180 1472 444 1535">Lead HA: N/A</td> <td data-bbox="444 1472 570 1535">N/A</td> <td data-bbox="570 1472 857 1535">N/A</td> <td data-bbox="857 1472 1122 1535">N/A</td> <td data-bbox="1122 1472 1424 1535">N/A</td> </tr> <tr> <td data-bbox="180 1535 444 1598"></td> <td data-bbox="444 1535 570 1598"></td> <td data-bbox="570 1535 857 1598"></td> <td data-bbox="857 1535 1122 1598"></td> <td data-bbox="1122 1535 1424 1598"></td> </tr> <tr> <td data-bbox="180 1598 444 1661"></td> <td data-bbox="444 1598 570 1661"></td> <td data-bbox="570 1598 857 1661"></td> <td data-bbox="857 1598 1122 1661"></td> <td data-bbox="1122 1598 1424 1661"></td> </tr> <tr> <td data-bbox="180 1661 444 1724"></td> <td data-bbox="444 1661 570 1724"></td> <td data-bbox="570 1661 857 1724"></td> <td data-bbox="857 1661 1122 1724"></td> <td data-bbox="1122 1661 1424 1724"></td> </tr> <tr> <td data-bbox="180 1724 444 1787"></td> <td data-bbox="444 1724 570 1787"></td> <td data-bbox="570 1724 857 1787"></td> <td data-bbox="857 1724 1122 1787"></td> <td data-bbox="1122 1724 1424 1787"></td> </tr> <tr> <td data-bbox="180 1787 444 1850"></td> <td data-bbox="444 1787 570 1850"></td> <td data-bbox="570 1787 857 1850"></td> <td data-bbox="857 1787 1122 1850"></td> <td data-bbox="1122 1787 1424 1850"></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA: N/A	N/A	N/A	N/A	N/A																									
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B. 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 Plan submission?

Y N

- X Statement of Housing Needs and Strategy for Addressing Housing Needs.
- X Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- X Financial Resources.
- X Rent Determination.
- X Operation and Management.
- X Informal Review and Hearing Procedures.
- X Homeownership Programs.
- X Self-Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
- X Substantial Deviation.
- X Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

B.2 New Activities. – See Progress Report

B.3 Progress Report.

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

1. Add to the affordable housing inventory in Jefferson County: In December 2022, JCHA completed the re-development of Allison Village apartments located in Arvada; 100 LIHTC units consisting of 1 & 2-bedroom units of which 39 are PBV units - 30 are dedicated to youth aging out of the foster care system and 9 are set aside for veterans. In the summer of 2023, JCHA purchased a newly constructed 24-unit property in Wheat Ridge. 12 of the 24 new affordable units will be designated as PBVs. Additionally, in late summer of 2023, JCHA has walls going up for 100 units in a new development in Wheat Ridge and has partnered with Jefferson Mental Health who will provide referrals and supportive services.
2. Preserve and improve existing affordable housing in Jefferson County: As of January, renovation has started on a 96-unit garden-style multifamily property in Arvada. Improvements include repairs to or new installation of piping, sewer lines, hot water lines, heating systems, and unit upgrades.
3. Expand and improve the Single-Family Emergency Home Repair Program: JCHA is on track to complete over \$300,000 in necessary home repairs by the end of 2023.
4. Explore the possibility of applying for MTW status: In March of 2022, JCHA was awarded the MTW Cohort 4 designation. From March of 2022 through August of 2023, JCHA updated its Administrative Plan. The updates align with the 14 MTW activities that have been selected. JCHA is on track to implement the MTW activities once HUD approval is received.
5. Expand JCHA's voucher program: JCHA continues to receive additional vouchers and gets them quickly under a HAP contract. Some examples include from December of 2022 to July of 2023, VASH vouchers have increased from 47 to 56, Mainstream vouchers have increased from 142 to 146, and PBVs have increased from 89 to 142.
6. Continue progress on the MTW Activities:

#	Description	Achieve cost efficiencies	Support self-sufficiency	Increase housing options
2023-1	Payment Standards – Fair Market Rents			X
2023-2	Self-certification of assets	X	X	
2023-3	HCV Leasing Initiative			X

	<table border="1"> <tr> <td>2023-4</td> <td>Waiver of Mandatory Initial Inspection</td> <td>X</td> <td>X</td> </tr> <tr> <td>2023-5</td> <td>Pre-Qualifying Unit Inspections</td> <td></td> <td>X</td> </tr> <tr> <td>2023-6</td> <td>Alternative Inspection Schedule</td> <td>X</td> <td>X</td> </tr> <tr> <td>2023-7</td> <td>Increase PBV Program Cap</td> <td></td> <td>X</td> </tr> <tr> <td>2023-8</td> <td>Increase PBV Project Cap</td> <td></td> <td>X</td> </tr> <tr> <td>2023-9</td> <td>Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement</td> <td>X</td> <td>X</td> </tr> <tr> <td>2023-10</td> <td>Alternative PBV Selection Process</td> <td></td> <td>X</td> </tr> <tr> <td>2023-11</td> <td>Increase PBV HAP Contract Length</td> <td></td> <td>X</td> </tr> <tr> <td>2023-12</td> <td>Increase PBV Rent to Owner</td> <td></td> <td>X</td> </tr> <tr> <td>2023-13</td> <td>Service Provision (local, non-traditional)</td> <td></td> <td>X</td> </tr> <tr> <td>2023-14</td> <td>Housing Development Programs (local, non-traditional)</td> <td></td> <td>X</td> </tr> </table>	2023-4	Waiver of Mandatory Initial Inspection	X	X	2023-5	Pre-Qualifying Unit Inspections		X	2023-6	Alternative Inspection Schedule	X	X	2023-7	Increase PBV Program Cap		X	2023-8	Increase PBV Project Cap		X	2023-9	Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement	X	X	2023-10	Alternative PBV Selection Process		X	2023-11	Increase PBV HAP Contract Length		X	2023-12	Increase PBV Rent to Owner		X	2023-13	Service Provision (local, non-traditional)		X	2023-14	Housing Development Programs (local, non-traditional)		X
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B.4	Capital Improvements. – Not Applicable																																												
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>																																												
C.	Other Document and/or Certification Requirements.																																												
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan? Pending review.</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p>																																												
C.2	<p>Certification by State or Local Officials.</p> <p>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.</p>																																												
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, 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.</p>																																												
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>																																												

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal:</u></p> <p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal:</u></p> <p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal:</u></p>

Instructions for Preparation of Form HUD-50075-HCV Annual PHA Plan for HCV-Only PHAs

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- A. PHA Information.** All PHAs must complete this section. (24 CFR §903.4)
 - A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), Number of 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.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))
 - B. Plan Elements.** All PHAs must complete this section. ([24 CFR §903.11\(c\)\(3\)](#))
 - B.1 Revision of Existing PHA Plan Elements.** PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

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 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. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information

provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR 5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR § 903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV. (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 HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support 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 rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR §903.7(e)).

Informal Review and Hearing Procedures. A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR §903.7(f))

Homeownership Programs. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR §903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)(iii)).

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.

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

B.2 New Activities. This section refers to new capital activities which is not applicable for HCV-Only PHAs.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.11(c)(3), 24 CFR §903.7(r)(1))

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs

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 (AFFH).

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

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

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides 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 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 6.02 hour 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