## 5-Year PHA Plan (for All 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, 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-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

| PHA Name:Melvindale Housing Commission_   |  |   | PHA Code: MI048  |   |  |  |
|---|--|---|--|---|--|--|
| PHA Plan for Fiscal Year Beginning: (MM/YYYY):2025 The Five-Year Period of the Plan :2025- 2029 PHA Plan Submission Type: \bigsize 5-Year Plan Submission \bigsize Revised 5-Year Plan Submission |  |   |  |   |  |  |
| A PHA must identify the<br>and proposed PHA Plan<br>reasonably obtain addition<br>submissions. At a minim   | e specific location<br>are available for<br>onal information<br>num, PHAs mu<br>s are strongly e | on(s) where the proposed PHA I<br>or inspection by the public. Add<br>n on the PHA policies contained<br>st post PHA Plans, including up<br>encouraged to post complete PHA | n, PHAs must have the elements list Plan, PHA Plan Elements, and all in itionally, the PHA must provide infinithe standard Annual Plan, but explains at each Asset Management PA Plans on their official websites. | nformation relevant to<br>formation on how the<br>scluded from their str<br>roject (AMP) and ma | the public<br>public may<br>eamlined<br>in office or |  |
|   |  |   |  |   |  |  |
|   | РНА  | itting a Joint PHA Plan and com  Program(s) in the  | Program(s) not in the  | No. of Units in   | Each Prog  |  |
| Participating PHAs  |  |   |  | No. of Units in   | Each Prog  |  |
|   | РНА  | Program(s) in the   | Program(s) not in the  |   |  |  |
| Participating PHAs  | РНА  | Program(s) in the   | Program(s) not in the  | РН  |  |  |
| Participating PHAs  | РНА  | Program(s) in the   | Program(s) not in the  | РН  |  |  |
| Participating PHAs  | РНА  | Program(s) in the   | Program(s) not in the  | РН  |  |  |

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| В.   | Plan Elements. Required for all PHAs completing this form.  |
| B.1  | Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.   |
|  | To promote adequate and affordable housing, economic opportunity and a suitable living  |
|  | environment free from discrimination.   |
| B.2  | Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.   |
|  | See attached  |
| B.3  | Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.   |
| 2.0  | See attached  |
|  | See attached  |
| B.4  | Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.   |
|  | On September 19, 2022 Melvindale Housing Commission adopted a preference for survivors of domestic violence. Currently those being served that have a verified preference. MHC's program is small so that even with a preference, issuance of vouchers will be limited and likely not timely. Participants who have claimed to be victims of domestic violence, stalking and/or threats of violence have been served quickly with the opportunity to move under VAWA policies. We have limited resources so counseling is recommended through outside agencies. |
| C.   | Other Document and/or Certification Requirements.   |
| C.1  | Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.   |
|  | See attached.   |
| C.2  | Resident Advisory Board (RAB) Comments.   |
|  | (a) Did the RAB(s) have comments to the 5-Year PHA Plan?  |
|  | Y N   |
|  | (b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.   |
| C.3  | Certification by State or Local Officials.  |
|  | Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.   |
| C.4  | Required Submission for HUD FO Review.  |
|  | (a) Did the public challenge any elements of the Plan?  |
|  | Y N<br>□ □  |
|  | (b) If yes, include Challenged Elements.  |
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#### D. Affirmatively Furthering Fair Housing (AFFH).

#### D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

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

Melvindale Housing Commission is not yet required to submit an AFH, neither has it performed an assessment of Fair Housing, however based on the 2021 Analysis of Impediments to Fair Housing Choice, developed by Wayne County government, the 2021-2025 Consolidated Plan (Wayne County) and the draft 2023 Annual action Plan (Wayne County), we evaluated the identified impediments to fair housing in Wayne County. Whereas it is not possible to tackle all seven of the impediments identified, Melvindale Housing Commission is committed to addressing two impediments, which are:

- Lack of fair housing education and awareness
- Racial and ethnic minorities are concentrated geographically with the County

#### Fair Housing Goal: Improve Education and Awareness of Fair Housing Requirements

#### Describe fair housing strategies and actions to achieve the goal

- Review Melvindale Housing Commission's Fair Housing and 504 Policies annually and update as needed based on changing regulations.
- Add Fair Housing information and Logo to agency webpage
- Use existing sources and programs to disseminate Fair Housing information and facilitate education on Fair Housing laws to applicants, participants and landlords
- Attempt to partner with Fair Housing Center of Detroit for educational programs.
- Include links on MHC's website to Michigan Department of Civil Rights, Fair Housing Center of Detroit and the Department of Housing & Urban Development's Fair Housing office.
- Feature Melvindale Housing Commission's complaint / appeal process on the agency's website.

### Fair Housing Goal: Expand opportunities to lease outside areas of poverty and/or racial and ethnic minority concentration

#### Describe fair housing strategies and actions to achieve the goal

- Use existing sources and programs to disseminate Fair Housing information and facilitate education on Fair Housing laws to applicants, participants and landlords
- Community / landlord outreach to include Fair Housing training
- Providing resource for housing outside areas of concentration

#### **Melvindale Housing Commission**

### Housing Needs – B2 Goals and Objectives in serving needs of low-income, very low income and extremely low income families for the next five years

Although there are no current statistics on housing need, reports from recent past years cite a need for affordable, safe housing.

According to a community needs assessment prepared by Wayne Metropolitan Community Action Agency, "housing is a major issue in Wayne County. Interviewees discussed the lack of safe, affordable housing. Tax delinquency and foreclosures cause people to lose their homes, and renting is often more expensive than buying. Rent costs decreased during the housing crisis, but now have rebounded, and not everyone can afford a healthy place to live. One interviewee sees problems with landlords accepting housing vouchers, because the landlords are concerned about getting the small percentage of rent that must come from the renter themselves. This problem is even further compounded with minimum income requirements to rent and a lack of rental units that meet the requirements for housing vouchers."

According to Wayne County's 2021-2025 Consolidated Plan, "within Wayne County, there is a shortage of units affordable to very low income households. With rental units often concentrated in lower income communities, there is a worry regarding the availability of housing for the working poor in close proximity to their work".

The Melvindale Housing Commission currently is an agent/owner for 199-unit one-bedroom development deemed affordable through multifamily rental assistance (HUD) and Low Income Housing Tax Credits. Rent is calculated at 30% of a household's income and is considered affordable; however, as of June 4, 2024 there are 87 applicants on the waiting list. With an annual turnover rate of approximately thirty units per year, the estimated wait time is approximately two years.

Additionally, the Melvindale Housing Commission administers a Housing Choice Voucher program with an allotment of 246 vouchers. The vouchers consist of traditional vouchers, Foster Youth to Independence vouchers and Mainstream vouchers. As of June 4, 2024 there are 215 active families assisted through the voucher program. Leasing additional vouchers has become difficult as cost have out-weighed funding, resulting in an anticipated "short-fall" condition for the agency.

Goals for serving the needs of low-income, very low income and extremely low income families over the next five years center on operational performance, maximizing dollars awarded by HUD and considering capitalizing on opportunities to develop additional revenue streams that may allow creative housing solutions including development.

### Goal 1: Continuing education of HCV staff to enhance knowledge and promote efficiency of program administration.

Continue to provide training opportunities to staff to improve management operations and compliance with federal regulations pertaining to maintenance, property management, procurement, capital fund and human resources. Continue to provide training to MHC management staff to assure a strong, long-term management team.

### Goal 2: Fiscal responsibility – Ensure full compliance with all applicable standards and regulations, including government generally accepted accounting practices.

Adhere to GASB statements and bulletins for accounting of the HCV program.

Maintain high performance standards in determining eligibility and subsidy levels for all clients; reducing and/or eliminating calculation errors that may impact subsidy. Comply with upcoming changes including HOTMA and Small Area FMR's, evaluating performance to stretch valuable rental assistance to cover the maximum number of households that can be supported by HUD funding.

# Goal 3: Equal Opportunity – Operate tenant based (HCV) program in accordance with all state and federal equal opportunity requirements including civil rights and 504 (reasonable accommodation).

- Continue staff participation in annual fair housing activities / training
- Periodically review Reasonable Accommodation forms for clarity and ease of use
- Administer HCV program in a fair, consistent and non-discriminatory manner.

### Goal 4: Tenant Based Program – maintain performance standards that support High Performer status

- Maintain High Performer status through superior management and adherence to SEMAP requirements.
- Maintain annual voucher utilization rate of between 98% and 100%
- Perform annual certifications and inspections on-time for 100% of Section 8 participants
- Abate rent 100% of time when landlord exceeds allotted 30 day correction period (without MHC approved extension).
- Terminate HAP contracts consistently and timely when landlords do not comply with program.

- Obtain 98% compliance rate for proper verifications and calculations of tenant rent and HAP
- Obtain 98% compliance with Rent Reasonableness documentation

### Goal 5: Expand Management Opportunities for increased revenue stream

- Explore options to manage other PHA's and/or other rental properties
- Consider consulting opportunities to generate additional revenue for agency
- Seek additional vouchers when funding is available

### Goal 6: Capitalize on partnerships to improve or expand affordable housing stock

• Participate in community groups, coordinate resources and consider partnership options for additional housing development

### **Melvindale Housing Commission**

### B3 – Progress Report – Progress the Melvindale Housing Commission has made in the goals described in the previous 5 year plan (2020-2024)

GOAL 1: Continuing education of HCV staff to enhance knowledge and promote efficiency, of program administration

Continue to provide training opportunities to staff to improve management operations and compliance with federal regulations pertaining to maintenance, property management, procurement, capital fund and human resources. Continue to provide training to MHC management staff to assure a strong, long-term management team.

Progress: There has been a constant churn of new employees. Current staff (in 2024) have received SEMAP training and a 5-day HCV Specialist training through NAHRO in May 2024. They have also received training on SEMAP at a local NAHRO Conference in Port Huron on April 18, 2024 as well as a presentation on SAFRMs at the same location.

**GOAL 2:** (Fiscal Responsibility) Ensure full compliance with all applicable standards and regulations, including government generally accepted accounting practices Adhere to GASB statements and bulletins for accounting of the HCV program.

Progress: MHC continues to meet this goal; no audit findings for the most recent completed fiscal year (FY 2023)

**GOAL: 3** (Equal Opportunity) - Operate the tenant based (HCV) program in accordance with all state and federal equal opportunity requirements including civil rights and 504 (reasonable accommodations)

Continue staff participation in annual fair housing activities / training Periodically review Reasonable Accommodation forms for clarity and ease of use Administer HCV program in a fair, consistent and non-discriminatory manner.

Progress: No training provided

Reviews of policies have been performed and are in process of being updated. An industry model Administrative Plan was procured to ensure all updated requirements will be included. Board will approve plan in the summer of 2024.

GOAL: 4 (Section 8 Tenant-based Program) manage the tenant based program in an efficient and effective manner to qualify for "standard performer" status

• Maintain current SEMAP score of "standard performer" while striving to improve performance each year.

- Continually improve performance at each certification year so that by year five, agency has reached a 90% or better in SEMAP
- Maintain annual voucher utilization rate of between 98% and 100%
- Perform annual certifications and inspections on-time for 100% of Section 8 participants
- Abate rent 100% of time when landlord exceeds allotted 30 day correction period (without MHC approved extension).
- Terminate HAP contracts consistently and timely when landlords do not comply with program.
- Obtain 98% compliance rate for proper verifications and calculations of tenant rent and HAP
- Obtain 98% compliance with Rent Reasonableness documentation

Progress: Fiscal Year end December 31, 2023 resulted in a HUD confirmed "High Performer" status. We hope this will continue through 2024, although staff changes always cause some performance hiccups.

**GOAL 5:** Seek to preserve MHC's Voucher program by increasing vouchers funded by HUD

The government's current funding model of the HCV program strangles small voucher programs. At current administrative fee levels, the MHC's program will fold within the five-year period being considered. We will seek all additional funding to increase the number of voucher's and therefore administrative fees earned to maximize and preserve affordable housing within our jurisdiction.

Progress: As of the date of this evaluation (June 4, 2024) Melvindale Housing Commission has 72 of 73 Mainstream vouchers under HAP contract and 29 of 35 FYI vouchers under contract. In 2023 we achieved 80% utilization of our FYI program and were allocated an additional 10 FYI vouchers. We intend to seek additional vouchers when we achieve 90% lease up of current allocation.

## Definition of Substantial Deviation / Significant Amendment or Modification to 5 year and Annual Plan

Criteria for defining "Substantial Deviation" from the 5-Year Plan: - A major change in the direction of MHC pertaining to its mission and goals would constitute a "substantial deviation" from the Agency's 5-Year Plan. - Examples include the undertaking of new program activities, development strategies, or financing initiatives that do not otherwise further Melvindale Housing Commission stated mission and goals as articulated in the 5-Year Plan.

Criteria for defining "Significant Amendment or Modification" to the 5-Year and Annual PHA Plans: - Changes to rent, admission policies, or organization of the waiting list(s) in the Housing Choice Voucher Program that will impact more than 25% of applicants and/or households assisted under the Program.

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