MHA

METROPOLITAN HOUSING ALLIANCE

ANNUAL PLAN 2025-2029

DRAFT COPY SUBMITTED TO THE BOARD OF COMMISSIONERS:
September 19, 2024

MHA BOARD OF COMMISSIONERS APPROVAL DATE:
September 19, 2024

RESOLUTION NUMBER:

2024-09-6902

HOUSING AUTHORITY INFORMATION:
LITTLE ROCK HOUSING AUTHORITY D/B/A

METROPOLITAN HOUSING ALLIANCE 100 S. ARCH STREET LITTLE ROCK, AR 72201 PHONE (501)340-4821

Dr. NADINE JARMON EXECUTIVE DIRECTOR EMAIL:
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RESOLUTION NO. 2024-09-6902

RESOLUTION TO APPROVE THE METROPOLITAN HOUSING ALLIANCE ANNUAL PLAN FOR 2025

WHEREAS, the Metropolitan Housing Alliance is a public housing agency charged with providing affordable housing opportunities and enhancing the quality of life for low-income families; and

WHEREAS, in compliance with the U.S. Department of Housing and Urban Development (HUD) requirements, the agency is required to develop and submit an Annual Plan detailing its goals, objectives, and strategies for the upcoming fiscal year; and

WHEREAS, the Annual Plan outlines the policies, programs, and activities the agency will undertake to fulfill its mission, including, but not limited to, housing development, resident services, capital improvements, and partnerships with community organizations; and

WHEREAS, the Board of Commissioners of the Metropolitan Housing Alliance have reviewed the Annual Plan and finds it to be in the best interests of the agency and the Little Rock residents it serves.

NOW, THEREFORE BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF LITTLE ROCK, ARKANSAS, D/B/A METROPOLITAN HOUSING ALLIANCE ("MHA") THAT:

The Board of Commissioners hereby approve for the Executive Director to adopt the annual plan for 2025.

Commissioner ~~MONTY BAUGH~~ KB STACIE BROWN seconded the motion and upon roll call the following vote was recorded:

Ayes:	Commissioners BROWN, BAUGH, BUCHANAN
Absent:	Commissioners JAMES
Abstain:	Commissioners
Nays:	Commissioners

IN WITNESS WHEREOF, each of the undersigned has hereunto set his hand of the Authority this 19th day of September 2024.

Kerry Wright, Chairman

Nadine Jarmon

Dr. Nadine Jarmon, Executive Director

Annual PHA Plan *(Standard PHAs and Troubled 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-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 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 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:** Housing Authority of the City of Little Rock, AR **PHA Code:** AR004 **PHA Type:** ☐ Standard PHA ☒ Troubled PHA **PHA Plan for Fiscal Year Beginning:** (MM/YYYY): 01/2025 **PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) **Number of Public Housing (PH) Units** 161 **Number of Housing Choice Vouchers (HCVs)** 3021 **Total Combined Units/Vouchers** 3182 **PHA Plan Submission Type:** ☒ Annual Submission ☐Revised Annual Submission **Availability of Information.** 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. 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. ☐ **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.	Plan Elements
B.1	**Revision of Existing PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA? Y N ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs ☒ ☐ Deconcentrating and Other Policies that Govern Eligibility, Selection, and Admissions. ☒ ☐ Financial Resources. ☒ ☐ Rent Determination. ☒ ☐ Operation and Management. ☐ ☒ Grievance Procedures. ☐ ☒ Homeownership Programs. ☐ ☒ Community Service and Self-Sufficiency Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☐ ☒ Asset Management. ☒ ☐ Substantial Deviation. ☐ ☒ Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): (c) The PHA must submit its Deconcentrating Policy for Field Office review.
B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☐ ☒ Hope VI or Choice Neighborhoods. ☐ ☒ Mixed Finance Modernization or Development. ☐ ☒ Demolition and/or Disposition. ☐ ☒ Designated Housing for Elderly and/or Disabled Families. ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☒ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers. ☐ ☒ Non-Smoking Policies. ☐ ☒ Project-Based Vouchers. ☐ ☒ Units with Approved Vacancies for Modernization. ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. 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.
B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. As we near the end of the funding stage for the final major construction to take place under the RAD conversion. Staff will align with the Board of Commissioners to plan for the development of additional housing to meet the needs within the very low-income housing community. This expansion will include conversion of a NSP 4 plex to be funded under HOPWA funding in conjunction with the City of Little Rock. The agency also plans to look into its leveraging options for replacing the units of the SRO with new-construction housing on the original site.

	LRHA/MHA is also exercising the sale of housing authority owned and vacant properties as a means of acquiring resources to recover from the insolvency position and to fund additional affordable housing options. Additional options being considered by the LRHA/MHA include: 1. **Repositioning the Remaining Public Housing Inventory –** We are down to under 250 remaining public housing units (although these properties also include a good deal of "non-ACC" units). Our RAD rents are something close to 75% of Section 8 FMRs. Hence, any chance we can swap out a public housing unit for a Section 8 TPV, and then project-base the TPV, we will come out way ahead. We feel that our best option is to convert via the RAD/Section 18 Small PHA Close-out Blend. Under current rules, 20% of the units will be converted via RAD and the other 80% via Section 18. The only caveats to the above are the following: o Because it looks like a number of these remaining public housing properties are also mixed-finance properties, we will need to get the approval of not only our board but the owner of the mixed-finance project. o Now that we know which repositioning tool to use, the next important issue is the financing strategy. Will these conversions be no-debt deals? Debt-only deals? Or tax credit deals? Hopefully, these properties are in good enough shape to make it as no-debt or debt-only transactions. We will need a Physical Needs Assessment (PNA) but, for planning purposes, it would be helpful to have some sense of the agency's own estimate of the needs at these properties. 2. **Oversight of the RAD-Converted Inventory –** We need to get the appropriate infrastructure for monitoring the performance of the properties that have already been converted. What does that infrastructure/system look like? A sub-set of this topic is the issue of the management of the Gorman properties. Both LRHA and Gorman have come to an agreement to replace the management over the next 12 months. What process will we use to find/recruit professional property management of these sites, remembering that we no longer are bound by public housing procurement requirements. 3. **Faircloth –** LRHA has several hundred unused Faircloth units (plus another 150-200 units if it converts its remaining inventory via the RAD/Section 18 Small PHA Close-out Blend). LRHA also has: o A large inventory of vacant land throughout the city, and o A large inventory of non-ACC units in various tax credit transactions. The question is whether LRHA should consider taking advantage of its unused Faircloth authority in connection with the above. Updates

Year	Development	Number of Units	Status
2018	Jesse Powell Towers Cumberland Towers Fred Panis Towers Madison Heights III	169 178 250 20	RAD Construction 100% Complete -
2024	Sunset Terrace Central and Stephens	87	Will be completed in 2024

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
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: We continue to work toward the completion of an audit. Stay tuned.

B1.
Statement of Housing Needs and Strategy for Addressing Housing Needs

Like many places in the United States, Little Rock, Arkansas needs to increase its supply of available housing, particularly for persons and families whose income is at or below 80% of the Area Median Income ("AMI"). The need for quality, affordable housing inversely correlates to income; in other words, the lower a family's income the more competition they face for housing.

LRHA identifies the housing needs of the low-income, very-low income and extremely low-income families who reside in LRHA's jurisdiction, namely, the City of Little Rock. LRHA determines housing needs based on analyses of LRHA's waiting lists, information provided by the City of Little Rock, and demographic data from the United States Census Bureau's most recent and available American Community Survey.

LRHA's waiting lists for public housing and HCVs all demonstrate that most families self-report that their income is at or below 30% AMI and that they need a 1- or 2-bedroom home. According to the Census Bureau, Little Rock has a total population of 202,591 people and approximately 18.5% of total households categorized as Extremely Low Income (at or below 30% AMI). Nearly 12% of families are Very Low Income (between 30% and 50% AMI) and an additional 10% report being Low Income (between 50% and 80% AMI).

LRHA's strategies to address the housing needs of these families include:
1) Maximizing the number of available affordable housing units by:
   a. Address needed capital projects in existing public housing units while also moving forward with repositioning strategies to ensure new affordable units are developed.
   b. Employing effective management practices and policies to minimize offline public housing units with an occupancy goal of 97%.
   c. Maintaining at least 96% lease-up rate or utilizing 100% budget authority for LRHA's HCV program by establishing effective payment standards, occupancy standards, and manageable practices.
   d. Applying for additional voucher subsidy and any available special program vouchers or other grant funding to serve more families.

2) Ensuring housing remains affordable by adopting appropriate payment standards and thoroughly reviewing landlord requests for contract rent increases.

3) Creating greater awareness of housing opportunities by publicizing and marketing agency programs and resources. LRHA plans to provide marketing information to local social service agencies, advocacy groups, partners, residents, and applicants. LRHA will also publicize housing opportunities through advertisements in local print, broadcast media, social media outlets as well as detailing these opportunities on LRHA's website.

4) Conducting activities to further fair housing, as further detailed in Section D.1 of this Plan.

LRHA will undertake these strategies while keeping in mind and considering all identified needs of applicants and residents when planning for redevelopment and new affordable housing communities. This includes, without limitation, analysis and consideration of family size, families with children, and persons with disabilities so that LRHA can continue to ensure the agency's developments can offer a sufficient number of units, range of sizes and bedroom configurations, and accessibility features as indicated by the stated needs of LRHA residents and applicants.

Further, LRHA plans to move to site-based waiting lists for all Project-based Voucher ("PBV") communities. Based on LRHA's past experiences, as well as past and current demographic information, this policy is crucial in further desegregating the City of Little Rock.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

This information for LRHA's LIPH program is contained in LRHA's Admissions & Continued Occupancy Policy ("ACOP"). Policies governing LRHA's HCV program are found in LRHA's Administrative Plan.

Both documents are submitted along with this Plan and available for public inspection and comment in all locations where this Plan is available, as identified on Exhibit A.

A summary of all changes to LRHA's ACOP and Administrative Plan are attached to this Plan as Exhibits B.1-2 and B.1-3, respectively.

Financial Resources

Attached to this Plan, as Exhibit B.1-4, is a summary of LRHA's financial resources. This summary includes, without limitation, operating, capital, and other anticipated federal resources available to LRHA, as well as tenant rents and other income – including nonfederal sources of funds – available to support public housing or tenant-based assistance. This summary also provides LRHA's planned use(s) for each resource.

The LRHA also plans to complete a Section 18 application for disposition of non-residential properties owned by the LRHA and the CAHC with he proceeds of sale supporting the operations of the LRHA and the mission of the housing authority to provide decent safe and sanitary affordable housing in the City of Little Rock.

Operation and Management

This information for LRHA's LIPH program is contained in LRHA's Admissions & Continued Occupancy Policy ("ACOP").

Policies governing LRHA's HCV program are found in LRHA's Administrative Plan.

Both documents are submitted along with this Plan and available for public inspection and comment in all locations where this Plan is available, as identified on Exhibit A. A summary of all changes to LRHA's ACOP and Administrative Plan are attached to this Plan as Exhibits B.1-2 and B.1-3, respectively.

LRHA has updated its written grievance procedures for LIPH programs in accordance with HUD notice PIH-2020-32. Specifically, LRHA has now included language in the ACOP that allows for remote grievance hearings in certain circumstances. A summary of all changes to LRHA's ACOP and Administrative Plan are attached to this Plan as Exhibits B.1-2 and B.1-3, respectively.

Homeownership Programs
LRHA is excited to place a greater focus on homeownership programs. As many Americans know, investing in a home is a primary means to building generational wealth; unfortunately, many Americans have been denied this opportunity for too long.

PHA change to resident paid utilities will be updated in the ACOP in accordance with 24 CFR § 965 & 966.4(b)(2).

Substantial Deviation
Substantial Deviation and/or Significant Amendment or Modification to 5-Year Plan and Annual Plan (903.7(r)(2) (i-ii))
A significant amendment and substantial deviation/modification to the Annual Plan is any change in policy which significantly and substantially alters the Authority's stated mission and the people the Agency serves.
As mandated by the U.S. Department of Housing and Urban Development (HUD), the Authority must define what a substantial change to the Agency Plan is. If a proposed change to the Agency Plan is considered a substantial change it must undergo a public process that includes consultation with the RAB, a public comment period, public notification of where and how the proposed change can be reviewed, and approval by the Authority.

Therefore, the Authority defines significant changes to the Agency Plan to be:
- Changes to tenant/resident admissions policies (not including preferences or waitlist organization).
- Changes to the HCV termination policy.
- Changes to the tenant/resident screening policy.
- Changes to public housing rent policies.
- Change in the use of replacement reserve funds under the Capital Fund Program.
- Change in regard to demolition, disposition, designation or conversion activities.
- Conversion of assistance under the Rental Assistance Demonstration Program.

B2 NEW ACTIVITIES
Conversion of Public Housing to Tenant-based Assistance
As part of LRHA's planned repositioning of its public housing communities, the agency will continue to analyze its inventory. LRHA may convert public housing to tenant-based assistance when it is economically feasible and will increase housing opportunities.
Such conversion may involve applications for Section 18 Demolition/Disposition or a RAD/Section 18 Blend for the following public housing communities: Madison Heights I, Madison Heights II, Homes at Granite Mountain I and Granite Mountain Senior in LRHA's inventory. Information about specific plans and applications is found elsewhere in this section and in relevant exhibits attached to this Plan.
Conversion of Public Housing to Project-based Rental Assistance or Project-based Vouchers under RAD
LRHA may convert public housing to Project-based Rental Assistance ("PBRA") or Project-based Vouchers ("PBV") assistance under HUD's Rental Assistance Demonstration ("RAD").
Every such RAD conversion will occur under the guidelines of H-2019-09 PIH Notice 2019-23 (HA), REV-4 and any successor Notices. Upon conversion to Project-Based Vouchers or Project-Based Rental Assistance, the Authority will adopt the resident rights, participation, waiting list, and grievance procedures described in Section 1.6 of H2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17 (PBV) conversions; and Section 1.7 of H-2019-09 PIH Notice 2019-23, Rev-4; and H-2016-17/PIH-2016-17(PBRA).

Additionally, the Little Rock Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Little Rock Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, LRHA's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Little Rock Housing Authority may also borrow funds to address their capital needs.
The Little Rock Housing Authority will also be contributing Operating Reserves and Capital Funds towards the conversion. LRHA may utilize a mixed-finance approach for replacement of its public housing developments under RAD. Mixed-finance development emphasizes the formation of new public and private partnerships to ensure long-term sustainability of public housing developments and the leveraging of public and private resources to transform the isolated communities in which many public housing residents currently live into vibrant and sustainable "mixed-income" communities with a wide range of family incomes. This approach utilizes a variety of financial resources and partnerships; therefore, it may be necessary to realign the various developments based on financial feasibility or other factors related to project implementation.

Disposition of Non-Residential Properties

The LRHA also plans to complete a Section 18 application for disposition and to dispose of non-residential properties owned by the LRHA and the CAHC with he proceeds of sale supporting the operations of the LRHA and the mission of the housing authority to provide decent safe and sanitary affordable housing in the City of Little Rock.

OTHER DESIGNATED PROGRAM FOR THE HOMELESS

Homelessness in the Cit of Little Rock has become even more disparaging in light of the fact that Arkansas does not have adequate shelters for 53.8% of its homeless population. Importantly, out of that total, 101 [are] family households, 188 [are] Veterans, 262 [are] unaccompanied young adults (aged 18-24), and 514 [are] individuals experiencing chronic homelessness.

In 2023, 66% of unaccompanied young adults and 78% of individuals experiencing chronic homelessness in Arkansas are unsheltered and have nowhere to go. This is especially true in Little Rock, Arkansas's capital city, due to the fact that the city does not recognize or provide any sanctioned campgrounds for its unsheltered citizens.

As a result of Arkansas's outright failure to provide adequate shelter, or at the very least adequate sanctioned campgrounds, over a thousand Arkansans are left on their own to battle the elements. This is not only an extreme burden, but with Arkansas's blistering heat, chilling temperatures, and propensity for severe storms and tornadoes, it can become a death sentence.

The LRHA has stepped up to assist in addressing the issue of homelessness by partnering with the City of Little Rock and community providers to offer what assistance we can. We have established a working relationship with DePaul USA who works directly with the Homeless population, and we desire to provide a homeless preference of 25 vouchers to support the housing assistance to homeless persons housed by this organization. Additionally, we are supporting the City of Little Rock's HOPWA initiatives in housing opportunities.

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.

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 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.

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.

C.5 Troubled PHA.
(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?
Y N N/A
☒ ☐ ☐

(b) If yes, please describe:

EHV IPERIA Reconciliation	See QAD EHV Report. Provide responses and review email from 3/7/24. Another email from June 2024.
HAP Payments	Reconcile/pay late HAP Payments to landlords, Including portability and UA payments
Late HCV Reexams	develop a schedule to address
Late PH Reexams	develop a schedule to address
MRI Software Conversion (Tenant/Rental Registers)	create accurate rental registers
Work Orders	develop schedule to address any resident safety concerns (1st); others (2nd)
Waiting List Management	Post notice - purge waiting list (PH & HCV)

Correct PIC Errors	clean up PIC reporting for 5058 for data accuracy; not resolved
HCV Utilization	Low utilization - offset 2nd year in a row. Do to underutilization in the program, HAP Reserves subject to offset for 2024 is $2,156,211 compared to 2023 of $778,295 (see the 3rd attachment). Your agency's current leasing potential as of 7/9/2024 was an additional 774 vouchers, which if leased, could have earned your agency an additional $717,523 in Unrestricted Admin Fees.
PH Occupancy	Occupancy less than 40% consistently for almost a year. During ongoing conversations with PHA, FO learned that units needed rehabbing but MHA had not paid contractors. FO approved for MHA to put more funds into operations from capital funds to get vendors paid. Also agreed to review proposal to put some vacant units into a HUD approved status. MHA still working through correcting PIC related PH occupancy errors.
ACOP	review policy for accurate HUD, state, local regulations
Admin Policy	review policy for accurate HUD, state, local regulations
Flat Rent Schedule	review/develop; not updated
Payment Standards	review board resolution approving PS & FMRs used
Utility Allowances	review/update
SEMAP	PHA is SEMAP troubled. Confirmatory review pending.
Tenant Files (QC)	comprehensive review of all Tenant files
Special Programs (VASH, FUP, EHV)	Review leasing/utilization for special programs
CAHC and other Affiliate(s)	review financial condition and next steps with MRI & LRHA
CAHC loans	review status of loan payments - notices of defaults
Audits	Meet with FORVIS
Cash balances	review cash position and immediate cash requirements - (payroll/landlord/vendors)
Capital Fund Grants	EPIC - review capital fund grants to ensure timely OED/EEED; CY2022, 2023, and 2024 require Document Packages in EPIC in order to spread in LOCCs (see Governance - PHA Plans)
GDAs	secure GDAs for bank accounts/review current ones (if applicable)

	Bank Accounts (MHA & CAHC)	Inventory and analyze all PHA (and affiliate) bank accounts
	MRI Software Conversion (Financials)	Meet with MRI: develop timeline and resources needed to ensure a smooth transition; '-MRI will be onsite at LRHA the week of 3/19/24. '-LRHA and HUD met with MRI 3/13/24; income statements are 90% completed; ; 2018 did not capture entities correctly; need breakdown for bank account transfers to pos to GL; true-up CFP and OpFund disbursements
	Operating Budget	Meet with staff and MRI to develop a true operating budget for board approval
	Financial Status & Processes (big picture)	
	Declarations of Trust (DOTs)	status of getting DOTs and current DOTs; need to know deal structure for mixed finance properties; deed search for who owns entities
	HUD Systems	review to ensure only current staff have access/review current staff access and change as needed
	Insurance Coverages	review and develop a schedule to ensure adequate insurance coverage. o Commercial Property, o Commercial General Liability, o Umbrella (if applicable), o E&O (Professional Liability), o Workers Compensation, o Auto & Machine Operated Equipment, o Flood (if applicable), o Cyber-security, o Boiler and Machinery (if applicable), o Fidelity Bond, and o Directors and Officers (D&O)/Public Official Liability
	Inventory	inventory all IT equipment & vehicles & other equipment
	Legal maters (urgent)	develop a schedule to address urgent and imminent legal matters
	Legal services contract	review contract
	LOCCs Approving Official	ensure only authorized persons have access/change AO immediately
	LOCCs User Certification	Recertify current user(s) in LOCCs by the 4/15 deadline (if applicable)
	IT Systems	terminated employees access; condition/integrity of data; data recovery options; cloud-based IT?; telephone systems; website management
	Staffing integration (CAHC to MHA)	MHA previously told HUD that CAHC staff were going to be integrated into MHA.
	Staffing: Review organizational chart/structure	Get an account of current staff/skill set/department/years experience, etc. - whose responsible for what?
	Pending (non-urgent litigation)	develop a schedule and actionable items to address
	Failed HQS Inspections	develop schedule to address urgent H&S concerns
	Late HQS Inspections	develop schedule to address urgent and past due H&S concerns

Public Housing Physical Conditions	walk all PH properties and develop a schedule to address any H & S issues and identify other deficiencies
Procurement for vendor to catch up inspections	more than $250,000 per email 3/7/24. Review other options, i.e. hiring staff
Credit Cards	Policy needs writing/updating; need to know how many credit cards agency has and who has them, including retail accounts (Lowes, Home Depot, other)
Capital Needs	Review capital needs and align with open grants/EPIC 5YR Action Plan revisions
Investments	Review investments - which are restricted vs. unrestricted? Unknown
CAHC Bylaws	review and develop a schedule for any changes
MHA Bylaws	review and develop a schedule for any changes
Commissioner Training	Spring NAHRO; Other
Customer Service (vendors/tenants)	
Harmony Health Clinic (2/22/24 - want to purchase 103 E. Roosevelt Rd.)	
Internal Controls Policy	review/develop
PHA Plan	Annual & Five-Year PHA Plans/w Public Comment requirement - see Capital Funds in Financials
Resident Advisory Board (RAB)	
Review actual operating practices vs written policies and procedures	review/revise/develop as needed
Staff Training	NAHRO; Other
Update Procurement Policy	include requisition and PO requirements for consistency

D.	**Affirmatively Furthering Fair Housing (AFFH).**
D.1	**Affirmatively Furthering Fair Housing (AFFH).** **Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFFH) 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.** LRHA remains deeply committed to ensuring that all persons have equal access to the agency's programs and services. To that end, LRHA will partner with the City of Little Rock and other neighboring jurisdictions to conduct a Regional Analysis of Impediments to Fair Housing choice. LRHA continues to work towards accomplishing the goals outlined in the Regional Analysis of Impediments to Fair Housing Choice through its work with the City of Little Rock and surrounding jurisdictions. The new administration of the LRHA conducted research and an analysis which examined the Little Rock region's structural and historical barriers to fair housing opportunities for members of protected classes and historically marginalized groups. We identified five core impediments to fair housing choice in and around the City of Little Rock: 1. Furthering fair and equitable housing; a. Historical actions of forced segregation. b. Limited, declining, or inconsistent local and federal funding and resources. c. Restrictive land use codes and development standards. 2. Rental housing choices; a. Geographic concentration of affordable rental units. b. Market forces causing rent amounts to increase faster than income. c. Landlord refusal to accept housing choice vouchers. d. Landlord willingness to evict tenants, sometimes without cause. e. Limited funding for housing choice vouchers. f. Limited income support for persons with a disability and lack of accessible affordable units. 3. Attaining homeownership: a. Historical discrimination and segregation in homeownership opportunities. b. Historical and recent discrimination in the lending process. 4. Accessing high opportunity environments; and a. Job-rich areas lack affordable housing and transit access. b. Region's inadequate public transportation systems. c. Disparity in access to high quality educational opportunities. 5. Fair housing knowledge and awareness. a. Lack of knowledge and awareness in fair housing laws. b. Lack of understanding of Arkansas' recent source of income protections.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Continue to improve internal processes to ensure fair and equitable housing.
LRHA has developed a Compliance Department and appointed a Compliance Officer to better assess, and address Agency needs in accordance with HUD Regulations, Fair Housing and Quality Assurance.
LRHA revised key fair housing plans, policies, and procedures. Specifically, LRHA revised the agency's: Language Access Plan, for persons with limited English proficiency; and Reasonable Accommodation procedures.
LRHA continues to provide telephonic and document translation services for LEP clients upon request.
LRHA will utilize communication cards to better serve in person clients and stakeholders with vision or hearing impairments.
LRHA will work with our software provider (MRI) to implement a Reasonable Accommodation Workflow process that allows for more accurate and consistent tracking and reporting of all reasonable accommodation requests received from application to end of participation. This process allows for regular updates to the applicant, tenant, or participant's file as they happen, including timely communication of the status and updates of each request. This information will remain with the tenant's file and will be available to the subject resident through an online, secure portal and upon request.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

LRHA will continue to enhance its communication of Fair Housing and Reasonable Accommodation policies and procedures from application to end of participation – to the public, its applicants, residents and participants. Effective communication efforts will include, but are not limited to, the use of Relay services, in person visits to any LRHA office, communication updates via the agency's website, and via email. Increase the number of accessible affordable units throughout the City of Little Rock and in neighboring jurisdictions.

LRHA continues to grant reasonable accommodation for persons who make such a request. This may include, but is not limited to, adding features to make an existing unit accessible or transferring a family to another LIPH unit that has the needed features.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Expand LRHA's HCV Homeownership Program. LRHA has begun a broad marketing and communications strategy to inform voucher recipients of the option to purchase a home as opposed to renting. The agency fully expects that participation in this program will significantly increase, providing an opportunity for more families to own their own home.

Project-Based Vouchers. LRHA has been very successful at using project-based vouchers ("PBVs") in communities located in high opportunity areas. This success continued in 2024, with the issuance of another RAD property conversion of Sunset to PBVs.

Exhibit A

Copies of this Plan, documents related to Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public at the following locations:

MHA's website (www.mha.com)

MHA's central office: 100 S. Arch Street, Little Rock, AR 72201

AMP Property Management offices:

Madison Heights
Homes at Granite Mountain Senior aka Legacy Apartments

Exhibit B.1-2 and B. 1-3 Summary of Changes to MHA's Admissions & Continued Occupancy Policy ("ACOP") and Administration Plan (Admin Plan)

Section/ Chapter	Proposed Language
PHAs must determine the value of net family assets, and the income earned on assets, at admission and annually. Additionally, PHAs must fully verify assets every three years by obtaining third-party verification of all family assets. Third-party verification of assets is always required when net family assets exceed $50,000, adjusted annually by HUD. When fully verifying assets, PHAs are required to obtain a minimum of one account statement to verify the balance of accounts and any interest accrued on the account, such as checking and savings accounts.	It is the policy of LRHA to determine each family's net family assets at the time of admission and at annual and interim reexaminations.
The PHA may choose to determine net family assets and anticipated income earned from assets based on a family self-certification, certifying that their net family assets are equal to or less than $50,000 without taking additional steps to verify accuracy, including at admission. However, assets will be fully verified, using third-party documentation every three years. PHAs who choose not to accept self-certification must verify all families' assets on an annual basis. PHAs must include in their ACOP/Admin Plan whether they will accept a self-certification of assets equal to or less than $50,000. When fully verifying assets, the PHA may choose to require more than one account statement for some or all interest-accruing accounts.	The LRHA will determine net family assets and anticipated income earned from assets at new admission [based solely on a family self-certification that their net family assets are equal to or less than $50,000. / by fully verifying the information reported by the family, regardless of the family having assets that are equal to or less than $50,000]. After a family's assets of $50,000 or less have been self-certified for two years in a row, at the next annual reexamination, LRHA will fully verify net family assets and anticipated income earned from assets. After fully verifying the family's net family assets, LRHA will resume accepting self-certification until the third annual reexam following the most recent full verification. If net family assets are greater than $50,000, assets will be fully verified. When fully verifying assets, LRHA will obtain a minimum of [one] account statement to verify the balance and any interest on accounts, including any checking and savings accounts.
When calculating Net Family Assets, the PHA must include the value of unnecessary items of personal property if the combined value exceeds $50,000.	When determining Net Family Assets, LRHA will take the following steps: 1. Provide the family with a description of non-necessary personal property and ask the family to estimate the total value of their non-necessary personal property. If the family estimates that their non-necessary personal property is valued under $50,000 (as adjusted annually for inflation) then the PHA will not ask the family to report the individual items of non-necessary personal property, except every third year when the PHA is fully verifying all assets. 2. If the family's non-necessary personal property has a net value over $50,000, LRHA will ask the family to report a full list of their nonnecessary personal property. The PHA will assess the list to

	determine if any of the items are necessary personal property. The PHA will make a determination as to each item identified, based on HUD (or LRHA) guidance, and if the item is determined to be necessary, or otherwise excluded from net family assets, like a retirement account, educational savings account, etc, it will be excluded from the family's net assets
PHAs have the discretion to define in written policy the types of items that constitute necessary and non-necessary personal property, as long as the policy does not conflict with any guidance from HUD on what constitutes necessary vs. non-necessary personal property. Any policy must be applied consistently across the program.	LRHA will consider the following to be necessary items of personal property: • Any automobile regularly used by a member of the family to commute to work, school, or childcare • Any computer or electronic device (such as laptop, tablet, monitor, or cellphone) that is used by any family member to work, look for work, or study • Any item used for religious purposes (such as a historic book of scripture). • Any furniture used in the family's home • Jewelry or other keepsakes which hold religious or cultural value, or deep family significance. For example, a watch which has been in the family and passed down from generation to generation. LRHA will consider the following to be non-necessary items of personal property: • Bank accounts and other financial investments (e.g., checking account, savings account, stocks/bonds) • Any automobile that is used purely for recreation (such as an RV or camping trailer) and not for any of the defined "necessary" uses, is a "non-necessary" item of personal property and is included in the calculation of net family assets • Collectible items (such as sports cards or trading cards) that are not used for a work-related purpose by a family member LRHA may make case-specific determinations of other "necessary" items.
There are two types of hardship exemptions to the ten percent threshold for deducting unreimbursed health and medical care expenses (for elderly and disabled families) and reasonable attendant care and auxiliary apparatus expenses (for families that include a person with disabilities). • The first category, Phased In Relief, defined in § 5.611(c)(1), is for families eligible for and taking the unreimbursed health and medical care expenses and reasonable attendant care and auxiliary apparatus expenses deduction in effect prior to January 1, 2024. • The second category, General Relief, defined in § 5.611(c)(2), is for families that can demonstrate that the family's health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination.	Phased-in Relief • All families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income examination prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first after the PHA implements HOTMA (this date will be publicly announced when available). • Families who receive this phased-in relief will have eligible expenses deducted as follows: ◊ 1st twelve months– in excess of 5% of annual income. ◊ 2nd twelve months – in excess of 7.5% of annual income. ◊ After 24 months – in excess of 10% threshold will phase in and remain in effect unless the family qualifies for general hardship relief. • Once a family chooses to obtain General Relief, a family may no longer receive the phased-in relief.

General Relief Families that can demonstrate that the family's health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination may qualify for General Relief. With qualifying hardships, the PHA will deduct eligible expenses in excess of 5 percent of the family's income for a period of up to 90 days. The PHA must develop written policies in their ACOP/ Admin Plan to define what constitutes a qualifying hardship for General Relief. Specifically, the PHA must establish policies regarding the types of circumstances that will allow a family to qualify for financial hardship and when such deductions may be eligible for additional 90-day extensions. PHAs must include in their ACOP/Admin Plan whether they will allow extensions of the 90-day hardship period while the family's hardship condition continues and the maximum number of 90-day extension periods (if establishing a maximum policy) that a family may receive. PHAs are not limited by HUD to a maximum number of 90-day extension periods. The PHA must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. PHAs must obtain third-party verification of the hardship or must document in the tenant file the reason that third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day hardship period	A family may request a hardship exemption for health or medical care expenses, reasonable attendant care, or auxiliary apparatus expenses. • Eligibility: A family must demonstrate that their applicable expenses increased or they experienced a change in circumstances that resulted in a financial hardship, as defined below, that would not otherwise trigger an interim reexamination. This relief is available regardless of whether the family previously received health and medical deductions or is currently receiving, or previously received, a phased-in hardship exemption under 5.611(c) (1). • A change in circumstances includes the need for new, qualifying, health/ medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income. • The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. • If the family wishes to request a successive 90-day period for the exemption, they must make that request within [5] days of the end of the current eligibility period and must demonstrate to the PHA why an additional period of exemption is warranted. If LRHA determines that the expense giving rise to the hardship exemption will not end within 90 days, LRHA may grant one or more 90-day extensions in advance. LRHA will not consider [more than four (4) consecutives] requests for this hardship exemption. Verification: LRHA must obtain third-party verification of the family's inability to pay rent or must document in the file the reason third-party verification was not available. LRHA must attempt to obtain third-party verification prior to the end of the 90-day period.
PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable.	Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. If the family reports the change in circumstances in a timely manner [(within 7 days)] LRHA will provide the family with [30 days] advance notice of any rent increase, and such rent increase will be effective the first day of the month beginning after the end of that [30- day] notice period. If the family does not report the change in a timely manner, the adjustment will be made retroactive to the date it would have been effective had the information been provided on a timely basis. The family

	will be responsible for any underpaid rent and may be offered a repayment agreement
De minimis errors occur when a PHA's determination of a family's income deviates from the correct income determination by no more than $30 per month in monthly adjusted income (or $360 in annual adjusted income). HUD may revise the amount of de minimis error though rulemaking. PHAs must implement a policy to credit or repay a family if the family was overcharged tenant rent because of the PHA's error in income determination, regardless of the dollar amount of the error (including de minimis errors). The credit or repayment must be retroactive to the effective date of the action the error was made. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged rent.	Once the LRHA becomes aware of the existence of an income calculation error, the error(s) will be corrected retroactive to the effective date of the action resulting in an error regardless of the dollar amount associated with the error. Families will not be required to repay LRHA in instances where LRHA miscalculated income resulting in a family being undercharged for rent. Once LRHA becomes aware of the error the family will be provided with a 30-day notice of the increase to their rent portion. LRHA will take corrective action to credit or repay a family if the family was overcharged tenant rent, including di minimis errors, in the income determination. • In the case of public housing residents, LRHA will provide an immediate rent credit. If the amount of the credit would be more than the rent due LRHA will provide payment to the family within [1 week] of becoming aware of the error. • In the case of HCV residents, the family's rent portion will be temporarily adjusted down with additional HAP going to the property owner. LRHA will send a letter to the family and the landlord prior to the change in payments notifying them of the change and the duration of the change. If the participant has vacated the unit, the credit will be mailed or provided to the family within [1 month] of becoming aware of the error.
PHAs must adopt policies prescribing when and under what conditions the family must report a change in family income or composition. Families must report household composition changes and changes to adjusted income consistent with HOTMA and PHA requirements. The ACOP/Admin Plan, as applicable, must include a policy describing how soon families must report changes in income, deductions, family and household composition, and the consequences of untimely reporting. The PHA must conduct any interim reexamination, required under the final rule and local PHA policies, within a "reasonable time" which may vary based on the amount of time it takes to verify information but generally should not be longer than 30 days after changes are reported.	Families must report all changes in family income or composition within [15 or another number] calendar [or business] days from the effective date of the change to be considered "timely." • Timely reporting related to an increase in rent: When a family reports a change in family income or composition that will result in an increase in tenant rent, the family must be provided a minimum of 30 calendar days' notice of the rent increase. The rent increase will be effective on the first of the month following the end of the 30-day notice. • Timely reporting related to a decrease in rent: Families that report changes in family income or composition within [15 or another number] calendar days from the effective date of the change that results in a decrease in tenant rent, the decrease will be effective the first day of the month after the date of the actual change leading to the interim reexamination of family income. • Untimely reporting related to an increase in rent: Families that do not report changes in family income or composition within [15 or another number] calendar days from the effective date of the change, that will result in an increase to tenant rent, will have the rent increase implemented retroactively to the first of the month following the date of the change leading to the interim reexamination. The family will owe a one-time payment equal to the difference in the rent paid and the new increased rent for each monthly rental period from the time of the change

	in circumstances through the date of the interim reexamination. • Untimely reporting related to a decrease in rent: When a family does not report a change in a timely manner that will result in a decrease in tenant rent, LRHA will implement the decrease no later than the first of the month following completion of the reexamination. ◊ However, LRHA may make a determination that the late report was due to circumstances outside of the family's control and that the decrease will be implemented retroactively. Situations that may warrant a retroactive rent decrease might include late reporting due to (but not limited to): • Medical emergency. • Natural disaster. • Wage theft by the employer. • Disruptions to PHA operations. ◊ When the determination is made that the late report was outside of the family's control, then a retroactive decrease may be applied beginning on the later of the first of the month following the date of the actual decrease in income or the effective date of the most recent admission, interim, or annual income examination. A rent adjustment cannot be retroactive to a date prior to the last income examination. • In case of any rent adjustment, the family will be provided with clear, written communication after the interim reexamination that shows: ◊ Any one-time charge or credit due to a retroactive adjustment. ◊ The new monthly rent due. ◊ The date that rent is due. ◊ The date of the family's next annual income reexamination. • In the case of an HCV family, funds will be returned to the housing provider. Funds will only be provided directly to a family if they no longer reside in the unit.
A family may request an interim reexamination of family income for any change since the last determination, however, the PHA may decline to conduct an interim reexamination of family income if the PHA estimates the family's adjusted income will decrease by an amount that is less than 10% of the family's annual adjusted income (or a lower amount established by HUD through notice), or a lower threshold established by the PHA which must be included in the ACOP/ Admin Plan, as applicable. PHAs are required by HUD to process interim reexaminations for all decreases in adjusted income when a family member permanently moves out of the unit.	An interim reexamination will be conducted when LRHA becomes aware that the family's adjusted income has changed by an amount that is estimated to result in a decrease of 10% or more of the family's annual adjusted income. Calculated percentage decreases less than 10% will not be rounded up to the nearest whole number.
PHAs must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income has changed by an amount that the PHA estimates will result in an increase of 10% or more in annual adjusted	LRHA will take into consideration not only changes to income but must also consider changes to eligible expenses, if applicable, to determine if an interim reexamination will be completed.

income or another amount established through a HUD notice. A series of smaller increases reported in adjusted income may cumulatively meet the 10% increase threshold, at which point the PHA must conduct an interim reexamination. However, PHAs may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family had a previous interim examination where the family's income decreased during the same reexamination cycle (earned, unearned, or combined). PHAs do not have the discretion to disregard increases in unearned income for the purposes of conducting an interim reexamination.	
After January 1, 2024, applicants and participants must sign and submit the HUD-9886, as applicable, at admission and no later than the next interim or regularly scheduled income reexamination.	LRHA requires that each family member above the age of 18 sign a HUD 9886 form to authorize the release of certain information to the PHA on admission. At each annual or interim reexamination, LRHA will determine if any family member turned 18 and has not yet signed the HUD-9886 form. Such a family member will be required to sign the appropriate form at the reexamination
Mandatory Policy The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the PHA to revoke consent. Families have the right to revoke consent by notice to the PHA; however, revoking consent can result in termination or denial of assistance if the PHA has established an ACOP / Admin Plan policy that the revocation of consent will result in termination of assistance or denial of admission. PHAs may not process interim or annual reexaminations of income, including when a family's income decreases and the family requests an interim reexamination to decrease tenant rent, without the family's executed consent form(s). PHAs must explain to families the consequences, if any, of revoking their consent. PHAs must notify their local HUD office when an applicant or participant family member revokes their consent.	The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the PHA to revoke consent. Families have the right to revoke consent by notice to LRHA, however, revoking consent will result in termination or denial of assistance.
Mandatory Policies PHAs must use EIV, in its entirety, to verify tenant employment and	LRHA will use HUD's verification hierarchy when verifying each household's income, assets, deductions, and expenses.

income information at annual and streamlined reexaminations of family composition and income. However, PHAs are no longer required to use EIV to verify tenant employment and income information during an interim reexamination. PHAs are required to use the following reports from the EIV System: Debts Owed & Termination, Deceased Tenants, Existing Tenant Search, Failed EIV Pre-Screening, Failed SSI Identity Test, Identity Verification, Multiple Subsidy, New Hires, No Income Report by HHA or SSA, No Income Reported on 50058, Summary of Household Information.	LRHA will access the EIV system and obtain an Income Report for each household during annual recertifications.
Mandatory Policies PHAs may determine the family's income prior to the application of any deductions based on income calculation information from other means-tested forms of federal public assistance programs or agencies made within the previous 12-month period. Safe Harbor verification must be obtained by means of third-party verification and must state the family size, must be for the entire family (i.e., the family members listed in the documentation must match the family composition in the assisted unit) and must state the amount of the family's annual income	LRHA may determine the family's income prior to the application of any deductions based on income calculation information from other means-tested forms of federal public assistance programs or agencies, listed below, made within the previous 12-month period. The LRHA will use third-party verification, which must include the family size and composition and state the family's annual income. The verification must be dated within the time frame specified for the type of verification, including within the previous 12-month period for purposes of the specified means-tested forms of federal public assistance. The family members listed in the third-party verification must match the family composition in the assisted unit. The annual income need not be broken down by family members nor income type. Given that annual income includes income earned from assets, when using Safe Harbor to verify a family's income, LRHA will not inquire as to a family's net family assets, nor the income earned from those assets except with respect to whether the family owns assets which exceed the asset limitation in 24 CFR § 5.618. If multiple determinations are available that meet all of the minimum verification criteria, LRHA will use the most recent determination (if completed more than 3 months apart). If determinations were completed within 3 months, LRHA will use them in the following order: 1. The Low-Income Housing Tax Credit program (26 U.S.C. 42). 2. The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.). 3. The Special Supplemental Nutrition for Women, Infants, and Children (42 U.S.C. 1786). 4. The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.). 5. Medicaid (42 U.S.C. 1396 et seq.). 6. Supplemental Security Income (42 U.S.C. 1381 et seq.). 7. The Earned Income Tax Credit (26 U.S.C. 32). If LRHA cannot obtain the required third-party verification, or if the family disputes the determination, the LRHA will calculate the family's annual

	income using the methods established in 5.609(c)(1) and (2) or in the applicable program regulations.
Mandatory Policy PHAs must attempt to gather third-party verification of SSN prior to admission, however, they have the option of accepting a tenant declaration and a third-party document with the applicant's name printed on it to satisfy the requirement.	LRHA requires that each family member (excepting non-eligible family members in mixed families) provide their Social Security number (SSN) and proof that the SSN belongs to that person. If a member of the family is unable to provide a Social Security card or other evidence of their SSN, LRHA will accept a document stating the person's name and a declaration from the person stating 1) why they cannot obtain their Social Security card and 2) what their SSN is. If LRHA has accepted any declarations as evidence of a SSN, LRHA will review the Failed SSA Identity Report monthly to quickly identify any participants whose identity is not verified.
Mandatory Policies PHAs must not assign monetary values to non-monetary in-kind donations received to calculate annual income. PHAs may only perform interim reexaminations due to increases in annual adjusted income that comply with 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3).	LRHA will no longer conduct zero income review for zero income families. Instead, LRHA will monitor zero income families in EIV to identify increases in income.
Tenant Paid Utilities	All LRHA public housing units have utility connections for water, gas, heat, and electricity. The payment of utilities is made by the resident or by the LRHA, depending on the building in which a unit is located. A. Resident-Paid Utilities; 24 CFR § 965 & 966.4(b)(2). The following requirements apply to residents living in developments with resident paid utilities: 1. Residents must obtain and maintain utility connections throughout tenancy. Residents must pay their utility bills to ensure that utilities remain connected. The utility bill must be in the name of a consenting adult authorized member of the household. Failure to maintain the utility connection is a serious violation of the lease, subject to lease termination. 2. If a resident or applicant is unable to get utilities connected, the resident or applicant will not be permitted to move into a unit with resident-paid utilities; 24 CFR § 960.203. 3. When a resident applies for utility service, the resident must sign a third-party notification agreement so that the LRHA is notified if the resident fails to pay the utility bill or if utility service will be disconnected. 4. Residents must bring in utility account information to the Property Manager when there is a change in their utility account numbers or other billing information. 5. Units where residents pay some or all utilities directly to the utility provider receive a monthly utility allowance, as a rent credit towards their monthly rent amount, that reflects a reasonable amount of utilities for the specific size and type of unit occupied. A reimbursement of a portion of the utility

	allowance may be paid by the LRHA directly to the utility provider if the Total Tenant Payment is lower than the utility allowance and a credit is due. The LRHA shall provide the resident with a letter indicating the amount of the reimbursement provided to the utility provider on their behalf; 24 CFR § 965.502(a). 6. The monthly utility allowance is deducted from the resident's Total Tenant Payment to compute the Tenant Rent the resident pays the LRHA; 24 CFR § 960.253(c)(3) and 966.4(b). a. If the resident's Total Tenant Payment is higher than the unit's designated utility allowance, then the resident's rent amount will be the difference remaining after the utility allowance is subtracted. b. If the resident's Total Tenant Payment is lower than the unit's designated utility allowance, then the resident may receive a reimbursement of a portion of the utility allowance after subtraction of the minimum rent amount. 7. The resident utility bills will be reflected as follows: a. If the resident's actual utility bill is less than the utility reimbursement, the resident will receive the savings in the form of a credit on the utility provider's billing statement. b. If the resident's bill is greater than the utility reimbursement, the resident must pay the excess amount directly to the utility provider. 8. The LRHA Residential Lease Agreement will state the utility allowance amount for the unit and the utility reimbursement to be received by the resident, if applicable.

Exhibit B.1-4

Statement of Financial Resources		
Sources	**Planned**	**Planned Uses**
1. Federal Grants		
a) Public Housing Operating Fund	$384,120	Operations
b) Public Housing Capital Fund		Capital Activities
c) Capital Fund Recovery Grant	0.00	
d) HOPE VI Revitalization	0.00	
e) HOPE VI Demolition	0.00	
f) Annual Contributions for Section 8 Tenant-Based Assistance	$19,008,816	HCVP
g) Family Self-Sufficiency Grant	0.00	
h) Resident Opportunity and Supportive Services Grant	0.00	
Other Federal Grants	0.00	
2. Prior Year Federal Grants (unobligated funds only)		
CFP 2019 as of 12/31/2023	$75,276.20	In accordance with application
CFP 2020as of 12/31/2023	$35,002.00	In accordance with application
CFP 2021 as of 12/31/2023	$92,088.25	In accordance with application
CFP 2022 as of 12/31/2023	$489,679.00	In accordance with application
CFP 2023 as of 12/31/2023	$403,462.00	In accordance with application
CFP 2024 as of 12/31/2023	$417,794.00	In accordance with application
3. Public Housing Dwelling Rental Income	$546,940	Operations of PHA sites
4. Other income (list below) Leases Estimated HUD Held Cash Reserves for 2022		LIPH Operations HCVP HAP
5. Non-federal sources (list below) Interest – Sale of Property – Bond Fees – Developer Fees – Perm Loan Payment –		Agency wide use RECD Operations and LIPH Dispositions RECD Operations RECD Operations RECD Operations
Total resources		
Note: Sources primarily based on the 2024 Budget		

PUBLIC MEETINGS

MHA
METROPOLITAN HOUSING ALLIANCE
GIVING EVERY STREET A NEIGHBORHOOD
MAKING EVERY HOUSE A HOME

MEETING NOTIFICATION

LRHA Annual and Five-Year Plan

Meeting

Madison Heights Apartments

Wednesday September 11, 2024

9:00 AM

Sign In Sheet

Event: Annual / 5 yr. Planning Meeting **Date:** 9-11-24

Name	Phone Number	Email Address
Brittany Johnson		bjohnson@mhapha.org
India Clark		iclark@mnapha.org
Donna Thomas		dthomas@mphpha.org
[illegible]		

Giving every street a neighborhood.
Making every house a home.

04:56

News & Annoucements

Metropolitan Housing Alliance 2025 Annual Plan Now Available for Review (http://lrhousing.org/metropolitan-housing-alliance-2025-annual-plan-now-available-for-review/)

September 20, 2024

The Metropolitan Housing Alliance announces that the 2025 Annual Plan is now available for public review. The plan can be accessed at our main office located at: 100 Bruce T. Moore WayLittle Rock, Arkansas 72201 ... **Read More » (http://lrhousing.org/metropolitan-housing-alliance-2025-annual-plan-now-available-for-review/)**

Public Housing Waitlist Closure (http://lrhousing.org/public-housing-waitlist-closure/)

August 20, 2024

MHA
METROPOLITAN HOUSING ALLIANCE
GIVING EVERY STREET A NEIGHBORHOOD
MAKING EVERY HOUSE A HOME.

MEETING NOTIFICATION

LRHA Annual and Five-Year Plan

Meeting

Homes at Granite Mountain

Granite Mountain Senior

Wednesday September 11, 2024

12:00 PM

Legacy Senior Homes & Homes at Granite Mountain Sign in Sheet

9/11/2024

Name	Address	Mobile Phone	Comments
Brittany Johnson			Director Asset Mgmt
[illegible]			Property Manager

MHA
METROPOLITAN HOUSING ALLIANCE
GIVING EVERY STREET A NEIGHBORHOOD
MAKING EVERY HOUSE A HOME.

MEETING NOTIFICATION

LRHA Annual and Five-Year Plan

Meeting

LRHA/MHA Administration Office

100 S. Arch Street

Wednesday September 11, 2024

4:00 PM

MHA
METROPOLITAN HOUSING ALLIANCE
GIVING EVERY STREET A NEIGHBORHOOD.
MAKING EVERY HOUSE A HOME.

September 11, 2024

Sign-In Sheet

Annual and 5 Year Plan Public Meeting

Name	Address	E-Mail	Phone Number
Minnie Johnson			
Shaneeda Jackson			

MHA Certifications

MHA

Streamlined PHA Plan
PHA Certifications of Compliance

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the *Streamlined Annual PHA Plan*

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 streamlined Annual PHA Plan for PHA fiscal year beginning _**2024**_ *, hereinafter referred to as the Streamlined Annual Plan, of which this document is a part and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of the Streamlined Plan and implementation thereof:*

1. The streamlined Annual Plan is consistent with the applicable comprehensive housing affordability strategy (or any streamlined Plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA and provided this Board or Boards an opportunity to review and comment on any program and policy changes since submission of the last Annual Plan.
3. The PHA made the proposed streamlined Annual Plan, including policy and program revisions since submission of the last Annual 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 streamlined Plan and invited public comment.
4. The PHA will carry out the streamlined Annual 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.
5. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address 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 maintain records reflecting these analyses and actions.
6. For streamlined Annual Plans that include a policy or change in policy for site-based waiting lists:
The PHA regularly submits required data to HUD's MTCS in an accurate, complete and timely manner (as specified in PIH Notice 99-2);
· The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
· Adoption of site-based waiting 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 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(b)(2).
7. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
8. 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.
9. 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.
10. The PHA has submitted with the streamlined Plan a certification with regard to a drug-free workplace required by 24 CFR Part 24, Subpart F.
11. The PHA has submitted with the streamlined Plan a certification with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implement regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
18. 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) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).
19. The PHA will undertake only activities and programs covered by the streamlined Annual Plan in a manner consistent with its streamlined Annual Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its streamlined Plan.
20. All certifications and attachments (if any) to the streamlined Plan have been and will continue to be available at all times and all locations that the PHA streamlined Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the streamlined 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 streamlined Annual Plan and will continue to be made available at least at the primary business office of the PHA.
21.The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):

___ 903.7a Housing Needs
___ 903.7b Eligibility, Selection, and Admissions Policies
___ 903.7c Financial Resources
___ 903.7d Rent Determination Policies
___ 903.7h Demolition and Disposition
___ 903.7k Homeownership Programs
___ 903.7r Additional Information
    ___A. Progress in meeting 5-year mission and goals
    ___B. Criteria for substantial deviation and significant amendments
    ___C. Other information requested by HUD
        ___1. Resident Advisory Board consultation process
        ___2. Membership of Resident Advisory Board
        ___3. Resident membership on PHA governing board

22. The PHA provides assurance as part of this certification regarding its streamlined annual PHA Plan that:
(i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
(ii) The changes were duly approved by the PHA board of directors (or similar governing body); and
(iii)The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.

Little Rock Housing Authority	AR004
PHA Name	PHA Number

Streamlined Annual PHA Plan for Fiscal Year: 2025

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 Nadine Jarmon	Title Executive Director
Signature X Nadine Jarmon	Date September 25, 2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 2024 *in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:*

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

PHA Name	PHA Number/HA Code
Housing Authority of the City of Little Rock	AR004

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

Name of Executive Director: Nadine Jarmon	Name of Board Chairperson: Kerry Wright
Signature Nadine Jarmon Date 9/27/24	Signature Kerry Wright Date 9/27/24

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

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

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

1. Type of Federal Action:	2. Status of Federal Action:	3. Report Type:
b a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	b a. bid/offer/application b. initial award c. post-award	a a. initial filing b. material change **For Material Change Only:** year ________ quarter ________ date of last report ____________

4. Name and Address of Reporting Entity: ☐ Prime ☐ Subawardee Tier ______, *if known*: **Congressional District**, *if known*: 4c	**5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:** **Congressional District**, *if known*:
6. Federal Department/Agency:	**7. Federal Program Name/Description:** CFDA Number, *if applicable*: ____________
8. Federal Action Number, *if known*:	**9. Award Amount,** *if known*: $
10. a. Name and Address of Lobbying Registrant (*if individual, last name, first name, MI*):	**b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*): There have been no lobbying activities.
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.	Signature: Nadine Jarmon Print Name: Nadine Jarmon Title: Executive Director Telephone No.: 501-340-4843 Date: 09/25/2024
Federal Use Only:	Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizationallevel below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

    (b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
0MB No. 2577-0226
Expires 3/31/2024

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

I, Kevin Howard, the Director of Housing & Neighborhood Programs
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2021-2024 and/or Annual PHA Plan for fiscal year 2025 of the Housing Authority for the City of Little Rock is consistent with the
PHA Name

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

The City of Little Rock and the surrounding SMSA
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Housing Authority of the City of Little Rock (LRHA) plan contains fundamental elements that are in conjunction and consistent with the goals of the City of Little Rock including the promotion of decent, safe and affordable housing; compliance with the Fair Housing Act of 1937, and provisions of furthering fair housing initiatives.

I hereby certify that all the information stated herein. as well as any information provided in the accompaniment herewith. is true a l ld 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: Kevin Howard	Title: Director of Housing & Neighborhood Programs
Signature:	Date: September 9, 2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code. Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid 0MB Control Number.