

1.0	PHA Information PHA Name: <u>City of Tucson Community Services Department</u> PHA Code: <u>AZ-004</u> PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>07/01/2009</u>				
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>1505</u> Number of HCV units: <u>4801</u>				
3.0	Submission Type <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
4.0	PHA Consortia <input checked="" type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)				
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program
	PHA 1:	AZ004	Public Housing		PH HCV
	PHA 2:	AZ004	Section 8		1505 3999
	PHA 3:	AZ033	Pima County Section 8		802
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.				
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years:				
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.				
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. (a) 2. Financial Resources				
	Financial Resources: Planned Sources and Uses				
	Sources	Planned \$	Planned Uses		
	1. Federal Grants (FY 2008 grants)				
	a) Public Housing Operating Fund	4,003,186			
	b) Public Housing Capital Fund	1,631,796			
	c) HOPE VI Revitalization				
	d) HOPE VI Demolition				
	e) Annual Contributions for Section 8 Tenant-Based Assistance	31,041,234			
	f) Resident Opportunity and Self-Sufficiency Grants	377,000			
	g) Community Development Block Grant	10,000	Public Housing Supportive Services & Unit Upgrades		
	h) HOME				
	Other Federal Grants (list below) Misc. Capacity	250,000			
	Housing Opportunities for People with AIDS	201,625	Section 8 Other		
	Positive Housing Opportunities	152,895	Section 8 Other		
	Family Self Sufficiency Coordinator Grant	117,000	Section 8 Other		
	Family Unification Program	889,000			
	Veteran's Affairs Supportive Housing	443,000			

2. Prior Year Federal Grants (unobligated funds only) (list below)		
HOPE VI Revitalization	6,050,000	Public Housing Capital Improvements
Public Housing Operating Fund	2,350,900	
Public Housing Capital Fund	50,000	Public Housing Capital Improvements
Family Self Sufficiency Coordinator Grant	91,789	Section 8 Other
3. Public Housing Dwelling Rental Income	2,990,540	Public Housing Operations
4. Other income (list below)		
5. Non-federal sources (list below)		
City Land Sale Proceeds	898,740	Public Housing Capital Improvements
Pima County Bonds	1,132,300	Public Housing Capital Improvements
City General Fund Contribution	328,150	Public Housing & Section 8 Operations
Central Office Cost Center Fees/Other Rents	2,371,830	Public Housing Operations
South Park Program Income	500,000	Public Housing Supportive Services
Federal Home Loan Bank – Affordable Housing Program	750,000	Public Housing Capital Improvements
State Housing Trust Fund	750,000	Public Housing Capital Improvements
Total resources	57,380,985	

4. Operation and Management

In September, 2008, the following changes were made to the Admissions and Continued Occupancy Policy (ACOP) and approved by the Board of Commissioners:

- Changes to payment plans: The new policy allows residents to pay one quarter of the total amount owed down with monthly payments to repay the balance over nine months if necessary. The down payment and payment schedule are determined on a case-by-case basis depending on the amount of the debt. The resident may not otherwise be on a current payment plan but the requirement to have 12 months between payment plans has been removed.
- Fraud Policy: A formal policy has been adopted to assist staff in the determination of fraud and outlines the procedures to address fraudulent activities of applicants/residents.
- Changes to the Housekeeping Standards: Additions were made to incorporate PHA supplied washers and dryers.
- Fair Housing Addendum: Although the Public Housing program is in compliance, the standards are located throughout various documents. This consolidation was added as an addendum to the ACOP to fulfill the requirements of a Notice of Funding Availability (NOFA) for a Resident Opportunity and Self Sufficiency (ROSS) Grant.

8. Safety and Crime Prevention

- The grant for the Weed & Seed program for the South Park area, which directly impacted Robert F. Kennedy Homes has expired.

12. Asset Management

- The AMP budgets are scheduled for Board of Commissioners' approval on April 7, 2009.
- The O & M inventory module is now operating to track the use of materials at the unit level in order to charge the AMP budgets.

13. VAWA

- The list of agency resources has been updated.

(b) The 5-Year and Annual Plan may be obtained by the public at the following

- All PHA Public Housing Management offices
- The PHA Central Office
- On line at <http://www.tucsonaz.gov/csd/WhatsNew>

7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <p>Martin Luther King HOPE VI, Project 4-05, 96 units</p> <ul style="list-style-type: none"> • Disposition of the original building has been completed • Construction of the underground garage will be completed June, 2009 • Construction of the MLK building (68 units) will be completed October, 2010 <p>Homeownership Programs</p> <ul style="list-style-type: none"> • The Section Eight Home Ownership Program (SEHOP) provides an opportunity for low-income Housing Choice Voucher (HCV) holders to achieve homeownership. The PHA will utilize 15 of its HCV's for the SEHOP. First preference will be given to Family Self Sufficiency (FSS) participants, then to other HCV holders who meet the qualifications for SEHOP. SEHOP assistance may be used to purchase a home within the City of Tucson or Pima County. Portability to another jurisdiction is also permitted if the receiving jurisdiction operates a homeownership program and chooses to absorb the family into their program. Qualified individuals/families will receive up to 15 years of mortgage assistance through SEHOP. (There is no maximum term limit for families that qualify as elderly at the commencement of homeownership assistance.) Families will be responsible for a portion of the monthly homeownership expense, which equates to at least 30% of the family's monthly-adjusted income. <p>Project Based Vouchers</p> <ul style="list-style-type: none"> • The PHA is planning to make available an undetermined number of HCV for project basing. Appropriate owner applicants will be solicited and evaluated according to HUD guidelines.
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p>
8.3	<p>Capital Fund Financing Program (CFFP).</p> <p><input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>

Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Access-ibility	Size	Location
Income <= 30% of AMI	24,571	5	5	3	4	3	3
Income >30% but <=50% of AMI	20,344	5	4	3	4	3	3
Income >50% but <80% of AMI	26,557	4	3	3	3	2	2
Elderly	16,012	N/A	N/A	N/A	N/A	N/A	N/A
Families with Disabilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A
White	641,886	N/A	N/A	N/A	N/A	N/A	N/A
Black	25,881	N/A	N/A	N/A	N/A	N/A	N/A
Hispanic	291,359	N/A	N/A	N/A	N/A	N/A	N/A
Native American	27,851	N/A	N/A	N/A	N/A	N/A	N/A
Asian	21,706	N/A	N/A	N/A	N/A	N/A	N/A

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/>	Section 8 tenant-based assistance		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	4101		301
Extremely low income <=30% AMI	3117	76%	
Very low income (>30% but <=50% AMI)	738	18%	
Low income (>50% but <80% AMI)	246	6%	
Families with children	3486	85%	
Elderly families	205	5%	
Families with Disabilities	738	18%	
Race/ethnicity (White)	3322	81%	
Race/ethnicity (Black)	574	14%	
Race/ethnicity (American Indian)	164	4%	
Race/ethnicity (Asian)	41	1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1532	37%	
2 BR	907	22%	
3 BR	1391	34%	
4 BR	250	6%	
5 BR	21	<1%	
5+ BR	1	<1%	

9.0

Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- Section 8 tenant-based assistance
- Public Housing
- Combined Section 8 and Public Housing
- Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/subjurisdiction: **Posadas Sentinel**

	# of families	% of total families	Annual Turnover
Waiting list total	85		20
Extremely low income <=30% AMI	59		
Very low income (>30% but <=50% AMI)	26		
Low income (>50% but <80% AMI)	0		
Families with children	85		
Elderly families	0		
Families with Disabilities	5		
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR	57		
3 BR	11		
4 BR	17		
5 BR			

Housing Needs of Families on the Waiting List

Waiting list type: (select one)

- Section 8 tenant-based assistance
 - Public Housing
 - Combined Section 8 and Public Housing
 - Public Housing Site-Based or sub-jurisdictional waiting list (optional)
- If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	4226		360
Extremely low income <=30% AMI	3212	76%	
Very low income (>30% but <=50% AMI)	803	19%	
Low income (>50% but <80% AMI)	211	5%	
Families with children	2155	51%	
Elderly families	761	18%	
Families with Disabilities	1437	34%	
Race/ethnicity (White)	3423	81%	
Race/ethnicity (Black)	592	14%	
Race/ethnicity (American Indian)	168	4%	
Race/ethnicity (Asian)	42	1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			

<p>9.1</p>	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <ul style="list-style-type: none"> • Shortage of affordable housing for all eligible populations In the upcoming years, the PHA will address the shortage of affordable housing for all eligible populations on the waiting lists. The method for addressing this need will be accomplished by maximizing and fully utilizing all available resources and increasing the number of affordable housing units. The agency will expand the supply of assisted housing by applying for additional funding, reducing Public Housing vacancies, acquiring or building units or developments, and leveraging resources through creative mixed-financing. The reasons for selecting these strategies are marked below. The agency’s reasons for choosing these strategies were due to funding and staffing considerations, community priorities, as well as consultation with program participants. • Specific Family Type: at or below 30% of area median income The PHA will adopt rent policies to support and encourage work. • Specific Family Type: at or below 50% of area median income The PHA will make use of admissions preferences for families who are working and will adopt rent policies to support and encourage work. • Specific Family Type: Elderly The PHA will apply for special purpose vouchers targeted to the elderly should they become available. • Specific Family Type: Families with disabilities The PHA will continue to carry out needed modifications to public housing units based on Section 504 Needs Assessment for Public Housing. Applications for special-purpose vouchers for families with disabilities will be completed should they become available and continuance of marketing to local non-profit agencies that assist families with disabilities. Housing Assistance (Section 8) will continue referral services to the Mainstream waiting list and the PHA will continue referral service to families under Home and Community Based Services. • Specific Family Type: Races or ethnicities with disproportionate housing needs The PHA will continue to affirmatively market to races/ethnicities shown to have disproportionate housing needs. Actions will include activities to further fair housing by counseling Section 8 tenants as to location of units outside of areas of poverty or minority concentration, market to owners outside of areas of poverty/minority concentration and will conduct outreach to address issues related to fair housing.
<p>10.0</p>	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year Plan.</p> <p>The City of Tucson/Pima County PHA Plan Consortium demonstrated significant progress in meeting its Five-Year Mission and Goals. In the fourth year of the Agency Plan, the City of Tucson/Pima County PHA Plan Consortium successfully implemented key projects and actions supporting City/County goals. These initiatives include the following:</p> <p><u>Expand the supply of assisted housing:</u></p> <ul style="list-style-type: none"> • The PHA was awarded 70 HUD-Veterans Affairs Supportive Housing (VASH) vouchers. • The PHA has applied for 150 vouchers to support the Family Unification Program. • Reduce public housing vacancies. 29 days for 2008 • Leverage private or other public funds to create additional housing opportunities: The Housing Authority has received Low Income Housing Tax Credit for the Depot Plaza HOPE VI project. • Acquire or build units or developments: The City of Tucson has completed the disposition of the Martin Luther King Building and construction has begun on the 68 replacement units at that site. • Commit to one for one replacement of public housing units The City of Tucson will replace the 96 units at the Martin Luther King Building. <p><u>Improve the quality of assisted housing:</u></p> <ul style="list-style-type: none"> • Improve public housing management: (PHAS Score) 86 in 2007, HUD has not issued 2008 score. • Improve voucher management: (SEMAP Score) The City and County Section 8 programs received a high performance rating for the fiscal year ending 06/30/08 – with a score of 98 for the City and 100 the County. • Ensure that the minimum HQS exceed minimum requirements by providing ongoing training for the inspectors, quality control measures and information pertaining to local codes.

Four new inspectors have been field trained by the inspection supervisor; two have attended classroom training and received certification; and two will be attending certification classes in June, 2009.

Inspector training is ongoing and the supervisor performs weekly quality control inspections.

- Increase customer satisfaction: Resident surveys resulted in a RASS score for 2008 of 9 points out of 10. PIH-REAC mandated that the PHA would receive a RASS score based on a "prior year's score".
- The public housing maintenance survey system continues to be used. Results indicate an increase in the satisfaction in the response time for maintenance repairs.
- Concentrate on efforts to improve specific management functions:

The HUD Asset Management Model has been implemented. 2008 AMP budgets were approved and reports are utilized for tracking and monitoring expenses by AMP, including fee for service charges. 2009 AMP budgets are scheduled for approval before the Board of Commissioners on April 7, 2009. The computerized inventory module development has been completed for the work order system and is in use. The Housing Management Division decentralized property management functions in July, 1987. Each property management office has approximately 250 units (one office manages 408 units but all are located within one building). Each management team consists of a project coordinator/manager responsible for the management of the property including lease enforcement, lease renewals, rent delinquencies. A housing agent assists the project coordinator/manager and a routine maintenance technician responds to all maintenance calls for the assigned units.

- Renovate or modernize public housing units:

The City of Tucson uses Capital Fund Program monies to continuously renovate public housing units. Projects from this past year included installation of security doors, the renovation of bathrooms, replacing evaporative cooling with air conditioning, exterior painting, window replacement with dual pane and erosion control.

The City of Tucson has partnered with the Tucson Urban League to complete energy audits of public housing units. This has allowed access to energy conservation grant money for improvements including appliance replacement, conversion of evaporative cooling to air conditioning, installation of increased insulation in units of older construction, window replacement to dual pane, etc. Improvements are based on the need as assessed by the grant requirements. Three sites have been completed and two are currently in progress.

- Demolish or dispose of obsolete public housing:

The City of Tucson received the Depot Plaza HOPE VI grant to dispose of the Martin Luther King building – a 96 unit building for elderly and disabled residents. Construction of the underground garage has started with an estimated completion date of June, 2009. The construction of the building itself has an estimated completion of October, 2010.

- Landlord Outreaches will be conducted in the spring and fall of 2009. Newsletters are sent to participants and landlords on a quarterly basis.
- Surveys regarding participant satisfaction with the services received from the Housing Assistance Division had an 84% favorable response.

Provide an improved living environment:

- Encourage community participation in the context of neighborhoods:

City of Tucson Community Services Department staff continue to participate in the "City Teams" which encourages City staff from various departments to work together to plan activities/projects, discuss concerns and solutions and share information.

- Implement public housing security improvements:

Security doors are being installed at both entrances on several public housing units located throughout the City. Security cameras and monitoring equipment installation is being planned for two elderly/disabled housing complexes.

- Improve communication between housing staff and participants of the programs through resident meetings and newsletters:

Public Housing participants receive quarterly newsletters that include information regarding new programs, new requirements, and how to receive resident services. Additional mailings include invitations to meetings, recruitment for the Resident Advisory Board, and various announcements. All information is translated to Spanish. A ROSS Grant activity schedule is distributed monthly to elderly and disabled residents.

- Communication among housing assistance staff, clients and landlords has improved and remains a division priority.
- Utilizing grant funds, and in conjunction with the Southwest Fair Housing Council, the City of Tucson offers free lead based paint inspections and risk assessments of units occupied by our clients. Free abatement of discovered hazards is offered to landlords.

Promote self-sufficiency and asset development of assisted households:

- Increase the number and percentage of employed persons in households of assisted housing.

The Family Self-Sufficiency Program continues to provide case management services, offers assistance with job training programs, and has a scholarship program to provide assistance with tuition and books.

The City of Tucson continues to work in partnership with the Pima County One Stop and Lutheran Social Services to refer clients for skills assessment, training and employment opportunities.

- Provide or attract supportive services to improve assisted recipients' employability:

The Family Self-Sufficiency Program provides case management services to connect FSS recipients with employment services in the community.

- Provide or attract supportive services to increase independence for the elderly or families with disabilities:

The City of Tucson is serving as the Contract Administrator for a ROSS Elderly Grant. This grant was awarded to the Lutheran Social Services of the Southwest and is serving our three elderly/disabled sites. Education in areas of chronic disease prevention and management, and socialization activities are offered in order to empower these elderly/disabled residents to continue living independently.

Fitness, nutrition, socialization and instructional forums are being offered in order to help promote independent living and a higher quality of life for participants.

Lutheran Social Services of the Southwest received a 2006 ROSS Grant to provide transportation services and a health literacy program to residents of Tucson House, Craycroft Towers and Lander Garden Apartments. The City of Tucson will again serve as the Contract Administrator for the grant.

The City of Tucson has contracted with Our Family Services to provide counseling and referral services to residents at Tucson House and Craycroft Towers.

Ensure equal opportunity and affirmatively further fair housing:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation/sexual identity, sexual preference and domestic partnership:

The City of Tucson has bilingual staff, provides oral and written information in Spanish, and attends Fair Housing training annually.

The PHA has developed and updated a Reasonable Accommodation policy for housing participants to ensure fair housing goals are addressed consistently.

The City of Tucson has developed a Limited English Proficiency policy for all participants who receive housing assistance and are collecting the language information in support of fulfilling the requirement of providing vital documents.

A Fair Housing Addendum was added to the Admissions and Continued Occupancy Plan for Public Housing and to the Section 8 Housing Choice Voucher Administrative Plan for the City of Tucson and Pima County. This policy includes:

- Employment recruitment for the FSS Coordinator position.
- Marketing to all eligible persons with disabilities and limited English proficiency.
- Outlines the intent of making buildings and communications that facilitate applications and services delivery accessible to persons with disabilities.
- Providing fair housing counseling services or referrals to fair housing agencies.
- Providing information of how to file a fair housing complaint.
- Outlines homeownership goals.
- Record keeping standards.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

It is the intent of the City of Tucson/Pima County PHA Plan Consortium to adhere to the mission, goals and objectives outlined in the five-year strategic plan. The plan, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur. The Housing Authority defines substantial deviations as:

- Any change in the planned or actual use of federal funds for activities that would prohibit or redirect the Housing Authority's strategic goals of increasing the availability of decent, safe and affordable housing for the citizens of the City of Tucson and Pima County.
- Any single or cumulative annual change in the planned or actual use of federal funds as identified in the five-year plan that exceeds 20% of the City of Tucson/Pima County Consortium's annual program budgets for Section 8 or public housing activities.
- A need to respond immediately to Acts of God beyond the control of the Housing Authority, such as earthquakes, civil unrest, or other unforeseen significant event.
- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.

A substantial deviation does not include any changes in HUD rules and regulations, which require or prohibit changes to activities listed herein.

A Significant Amendment or Modification to the Annual Plan and five-year Plans is defined as:

- Changes of a significant nature to the rent or admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to effect a change in the Section 8 Housing Choice Voucher Administrative Plan for the City of Tucson and Pima County or the Public Housing Admissions and Continued Occupancy Policy (ACOP).

	<ul style="list-style-type: none"> • A change in the planned or use of replacement reserve funds under the Capital Fund that exceeds 20% of the City of Tucson’s annual budget.
<p>11.0</p>	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <ul style="list-style-type: none"> (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) (c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) (d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) (i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)