



CITY OF TUCSON

HOUSING & COMMUNITY DEVELOPMENT

**2024 ANNUAL PLAN
CITY OF TUCSON
HOUSING AND COMMUNITY DEVELOPMENT**

Si desea que se le explique este documento en español, llame al telefono (520)791-4739 o por email HCDAdmin@tucsonaz.gov



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

Applicability. The Form HUD-50075-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	<p> PHA Name: <u>City of Tucson Housing and Community development</u> PHA Code: <u>AZ004 & AZ033</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1505</u> Number of Housing Choice Vouchers (HCVs) <u>5721</u> Total Combined Units/Vouchers <u>7226</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> 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. </p> <p> The proposed 2023-2024 Annual Agency Plan is available at the following location: https://www.tucsonaz.gov/housing-and-community-development as well as the office locations listed below: </p> <table border="1" data-bbox="219 1549 1388 1843"> <thead> <tr> <th>AMP Number</th> <th>Property Name</th> <th>Property Address</th> </tr> </thead> <tbody> <tr> <td>Administrative Office</td> <td>City of Tucson Housing and Community Development</td> <td>310 N Commerce Park Loop, Tucson, AZ 85745</td> </tr> <tr> <td>AZ004000048</td> <td>Tucson House</td> <td>1501 N Oracle Rd, Tucson, AZ 85705</td> </tr> <tr> <td>AZ004700120</td> <td>MLK</td> <td>55 N 5th Ave, Tucson, AZ 85701</td> </tr> <tr> <td>AZ004600113</td> <td>Craycroft Towers</td> <td>1635 N Craycroft Rd, Tucson, AZ 85712</td> </tr> <tr> <td>AZ004000051</td> <td>Posadas</td> <td>464 W. La Paz St., Unit # 01 Tucson, AZ 85701</td> </tr> </tbody> </table>	AMP Number	Property Name	Property Address	Administrative Office	City of Tucson Housing and Community Development	310 N Commerce Park Loop, Tucson, AZ 85745	AZ004000048	Tucson House	1501 N Oracle Rd, Tucson, AZ 85705	AZ004700120	MLK	55 N 5 th Ave, Tucson, AZ 85701	AZ004600113	Craycroft Towers	1635 N Craycroft Rd, Tucson, AZ 85712	AZ004000051	Posadas	464 W. La Paz St., Unit # 01 Tucson, AZ 85701
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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: City of Tucson Housing and Community Development	AZ004	Housing Choice Voucher	Public Housing	1505	5721
Pima County Community Services	AZ033	Housing Choice Voucher		0	877

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
 - Deconcentration 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):

See attachment B.1

(c) The PHA must submit its Deconcentration 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.

	<input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers. <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <p>(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.</p>
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. See attachment B.3
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. See attachment B.4
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe: See attachment B.5
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 <input checked="" type="checkbox"/> <input type="checkbox"/> (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 , <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i> , 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, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>			
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>			
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>				
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="180 1220 1455 1671"> <tr> <td data-bbox="180 1220 440 1262">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="180 1262 1455 1671"><i>Describe fair housing strategies and actions to achieve the goal</i></td> </tr> </table> <table border="1" data-bbox="180 1692 1455 1732"> <tr> <td data-bbox="180 1692 440 1732">Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<i>Describe fair housing strategies and actions to achieve the goal</i>	Fair Housing Goal:
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Attachment B.1 (b) - Revision of Existing PHA Plan Elements

*Rent Determination
Payment standards*

City of Tucson’s Housing and Community Development (HCD) Public Housing Authority conducted a rental market study and updated the payment standards effective February 1, 2024. The payment standards were previously at 120% of the Fair Market Rent (FMR). With new FMR’s and increased Payment Standards the PHA is now providing a payment standard that is at 110% of the FMR. In 2023 rents in Tucson increased, on average, by 3.3% from 2022, with incremental increases averaging 1.65% per year.

Attachment B.1 (c) - Deconcentration Policy

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income fixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA’s deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

PHA POLICY

The PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

PHA POLICY

The PHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (30% of median income).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

PHA POLICY

For developments outside the EIR the PHA will take the following actions to provide for deconcentration of poverty and income mixing:

- Policy does not exist at this time but based on site-based waiting list implementation and its impact on PHA's public housing developments, it may be required in the future.

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

PHA POLICY

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing, and income targeting will also be considered in accordance with HUD requirements and PHA POLICY.

12-IV.E. DECONCENTRATION

PHA Policy for this deconcentration is associated with the transfer policy for the PHA program: If subject to deconcentration requirements, the PHA will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.

Attachment B.2 (b)– New Activities

Hope VI or Choice Neighborhoods

The City of Tucson was awarded the Choice Neighborhood Planning Grant in 2018 and subsequently completed a competitive selection process for a co-developer partner to redevelop Tucson House. currently, the City of Tucson is working with the co-developer (Gorman) to create a phased plan for financing, construction, relocation, and replacement units. In July 2023, The City of Tucson was awarded the CNI grant to move the project forward. The project is in the initial phases of planning with an anticipated construction start in 2025.

z Demolition or Disposition.

The City of Tucson Housing and community development is working on a repositioning plan for several Public housing projects that include MLK Apartments (55 N 5th Ave Tucson, AZ 85701) , Craycroft Towers (1635 N Craycroft Rd, Tucson, AZ 85712), and a portfolio of single family homes.

Units with Approved Vacancies for Modernization.

The City of Tucson's Public Housing division currently has 102 HUD approved off-line units designated for modernization. The PHA is in the planning stages of determining the timelines and processes for modernization of the 102 units.

Attachment B.3 – Progress Report

The City of Tucson Housing and Community Development (HCD) has made progress in the 5-year and Annual Agency Plan's Mission and Goals.

Increase in affordable housing availability

HCD has increased the landlord participation by 35% with the assistance of a city ordinance that does not allow Landlords to discriminate based on source of income as well as help and support of our internal Landlord support team which addresses the needs of landlords and continually engages and educations Landlords. The addition of landlord briefings has provided landlords and the community an opportunity to learn about our programs and learn how they can benefit all stakeholders.

Decreasing Homelessness

HCD has worked to further engage partner and community agencies that we are currently working with. In late 2023 HUD Emergency response technical assistance began assisting HCD and community partners in triaging homeless encampments and helping to create greater efficiencies in the process, policies, and procedures surrounding housing unsheltered people in the Tucson community.

The Project Based Voucher Program for both Tucson and Pima County is a great program in increasing housing affordability. Three projects in 2023 have been activated and leased up. With one additional project that began lease up in early 2024. The projects have brought on over 50 affordable housing units.

Create Administrative Efficiency and Improving Customer Service

The PHA has started the preliminary work to identify new housing software vendors that will allow the PHA to more efficiently and accurately provide service to our residents, participants and stakeholders. While still in preliminary stages, there is an anticipated roll out/conclusion slated for 2025/2026.

The Public Housing division is continuing to explore payment options for residents of public housing.

Improve Quality of Assisted Housing

Praxis Consulting Group, LLC continuing to work with HCD to provide analysis and recommendations related to the City's public housing portfolio, including the repositioning of housing assets to best serve Tucson's residents. To inform our repositioning recommendations, Praxis has analyzed a wide range of HCD's qualitative and quantitative data, typically disaggregated by property and/or Asset Management Program (AMP). Quantitative data to be analyzed includes financial audits of HCD properties, utility costs and energy efficiency data, Department finances and budgets, and other financial information related to the operation of Tucson's public housing portfolio. Qualitative data to be analyzed includes information about the physical conditions of various properties and their modernization history, neighborhood and demographic data that will inform policy recommendations, and the input of expert staff and public housing residents. The final product will include a series of recommendations for preserving, improving and/or disposing of specific public housing properties.

Program Enhancements

The PHA is increasing staffing levels across HCV, Public Housing, and Housing first programs. HCV has collaborated with state agencies, non-profit, agencies, and other community agencies to expand the reach of voucher programs and referrals into the program.

Attachment B.4- Capital Improvements

See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 07/01/2023.

Attachment B.5- most recent fiscal year audit

The most recent single audit consisted of the two following findings:

Audit Findings

- 1.) The fiscal year 2023 unaudited financial information was not submitted timely to the Department of Housing and Urban Development (HUD). The financial information was required to be submitted to HUD by 8/31/23; however, the financial information was not submitted until 11/30/23.
- 2.) For one of 40 Section 8 tenant files reviewed, the annualized income was not properly calculated as the calculation used the incorrect monthly income amount.

Attachment C.1- Resident Advisory Board (RAB) Comments.

Questions from February 6, 2024, Public Hearing

Summary

The RAB comments/questions included questions about both the housing choice voucher (HCV) program and public housing. Regarding HCV, the questions are around the topics of the waitlist, overall processes of the HCV program, and the HCV program's interaction with apartments in the community. Regarding Public Housing, the questions/comments consisted of topics around new inspection protocols, repositioning for Tucson House (a public housing site), and the waitlist for public housing.

Will Tucson House be public housing and low income?

Yes, Tucson Housing will continue to be public housing and low-income. The city continues to work in collaboration with our partnerships regarding the Tucson House.

What does the NSPIRE Program entail?

NSPIRE is the National Standards for the Physical Inspection of Real Estate, which establishes the three inspectable areas of an inspection – the unit, inside, and outside.

“Unit” - refers to the interior components of an individual dwelling, where the resident lives.

“Inside” – refers to the common areas and building systems within the building interior and not inside a unit. This could include interior laundry facilities, workout rooms, etc.

“Outside” – refers to the building site, building exterior components, and any building systems located outside of the building or unit. This includes things like playgrounds, workout rooms, and so on.

These areas must be functionally adequate, operable, and free of health and health and safety hazards. This increases the usability of the standards and streamlines the inspection process to ensure that all residents live in safe, habitable homes.

When we apply for public housing, where will we be on the list?

When you apply for public housing, you will be placed on the list. The PHA cannot provide you with your position but can confirm you are on the list. It is important to keep the PHA updated with all contact and address information.

Will we be able to return to Tucson House?

Yes, once renovations are completed.

What do you mean by the lottery system on the Section 8 vouchers?

When the Waitlist opened for the Housing Choice Voucher (Section 8) Program on January 3, 2023, all applicants were going through the lottery process. The lottery process means that applicants will be randomly selected by computer to be placed on the waitlist in the order they were selected. However, effective January 1, 2024, all applicants will be selected by date and time.

When can you make a move on Section 8 if you want to move to a different apartment?

To be approved for a transfer to a new apartment, a family must fulfill the obligations of their current lease agreement and give their landlord property notice (30-60-day notice, depending on what is in your lease agreement). You and your landlord must complete a Notice to Vacate (NTV) and submit it to the Housing Authority prior to you moving.

Are all apartments allowing Section 8 now?

All apartments within the city limits should be accepting Section 8 voucher holders because of the Source of Income (SOI) Protection Ordinance that was passed in January 2023. The SOI Ordinance makes it unlawful for landlords or property managers to reject a rental application solely based on the applicants source of income, including rental assistance such as Housing Choice Voucher Program, Rapid Rehousing, and other federal, state, or local assistance programs. Apartment complexes within the city have to give voucher holders an opportunity to apply for housing. However, all potential residents must still qualify per the apartment's policies.

Is there a top of income that I have to be in, in order to have my voucher program? I mean, if someone in my household is making more money, is there a top income to be in the Section 8 program?

No, the Housing Choice Voucher Program (Section 8) is based on combined gross income of all households members. Eligibility is based on the current Area Median Income (AMI) Guidelines published by the Housing and Urban Development (HIUD). Your gross adjusted income and number of members that are in your family will determine if you qualify.

Attachment D.1 – Affirmatively Furthering Fair Housing.

City of Tucson Housing and Community Development (HCD) requirement to submit an AFH was suspended in 2018. As outlined in CFR 903.15 (2), the PHA is committed to affirmatively furthering fair housing as follows:

Ensuring policies are designed to reduce the concentration of tenants and other assisted persons by race, national origin, and disability. Any affirmative steps or incentives a PHA plans will be stated in the admission policy.

PHA policies will include affirmative steps to overcome the effects of discrimination and the effects of conditions that result in limiting participation of persons because of their race, national origin, disability, or other protected class.

Such affirmative steps may include, but are not limited to, marketing efforts, use of nondiscriminatory tenant selection and assignment policies that lead to desegregation, additional applicant consultation and information, provision of additional supportive services and amenities to a development (such as supportive services that enable an individual with a disability to transfer from an institutional setting into the community), and engagement in ongoing coordination with state and local disability agencies to provide additional community-based housing opportunities for individuals with disabilities and to connect such individuals with supportive services to enable an individual with a disability to transfer from an institutional setting into the community.

In addition, HCD completed the Analysis of Impediments in 2020 which outlined both the impediments and actionable goals to address those impediments and is applicable to this item. Attached is a summary of the Impediment and corresponding Action Plan that will be carried out by HCD to ensure fair housing for all residents of the City of Tucson.