

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>Bethlehem Housing Authority</u> PHA Code: <u>PA011</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1455</u> Number of Housing Choice Vouchers (HCVs) <u>513</u> Total Combined Units/Vouchers <u>1968</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> <input checked="" type="checkbox"/> Main administrative office of the BHA <input checked="" type="checkbox"/> BHA development management offices <input checked="" type="checkbox"/> Main administrative office of Bethlehem City Hall <input checked="" type="checkbox"/> PHA website @ www.BHA645.homestead.com <input checked="" type="checkbox"/> Other (list below) BHA RESIDENT COUNCIL OFFICES; NORTHEAST COMMUNITY CENTER OFFICE; RAB MEMBERS BHA Plan Supporting Documents are available for inspection at: (select all that apply) <input checked="" type="checkbox"/> Main business office of the BHA development management Offices located at 645 Main Street and 1429 Fritz Drive. <input type="checkbox"/> Other (See Below A.1) </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:					
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		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
- 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):

Grievance hearings are held via video or telephone conference, they are no longer conducted in-person. The grievance filing and process remains the same, it is just no longer in-person. BHA'S Deputy Director is currently updating the Admissions and Continued Occupancy Policy to reflect the most updated version as provided by Nan McKay & Associates. The payment standards for the Housing Choice Voucher Program were increased to 110% for one- and two-bedroom units in January 2021, and for three- and four-bedroom units in June 2021.

Below are the waivers that the Bethlehem Housing Authority has adopted that affect the residents living in our communities:

PH and HCV – Until 12-31-2021

1. Delay of annual re-examination of income and family composition.
2. Requirement to use the income hierarchy, including EIV, and allow use of self-certification for the highest form of income verification.
3. Requirement to use income verification requirements, including EIV for interim re-examinations.
4. Mandatory EIV monitoring requirements have also been waived.

HQS –

1. Initial inspection requirements, allowing owner certification of non-life threatening deficiencies.

This applies to both initial inspections, and Pre-HAP contract inspections.

2. Non-life threatening initial unit inspections, allowing for extension up to 30 days for owner repairs.
3. The requirement for Quality Control sampling inspections has been waived.

HCV –

1. The requirement for an oral briefing, with an alternate method being permitted.
2. The PHA may provide voucher extensions regardless of the PHA policy.
3. The PHA may extend the period of time after the last HAP payment is made before the HAP contract terminates.
4. Requirement to adopt revisions to the Administrative Plan have been waived.
5. Prior SEMAP scores will be retained until 1-1-2022.

PH –

1. Changes to the approval process of the ACOP have been waived.
2. Temporarily suspension of the Community Service Requirements.
3. PHH Notice 2012-13, waives the requirement of self-inspections of each project during CY 2020.

ADMIN and ACOP -

1. Unit offers in Public Housing have been changed to one-offer only.
2. Public Housing Applications have been changed to on-line only.
3. Annual Re-examinations for PH and HCV have been amended, in order that in-person appointments are changed to telephonic or video conferences.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

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-mixing 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 de-concentration 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 in an effort 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 advantage of all allowable strategies in order to comply with the deconcentration requirements.

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.

	<p><input checked="" type="checkbox"/> <input 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> <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> <p>Bethlehem Housing Authority will be submitting units to PIC for approved vacancies during modernization for the ongoing renovations in our Lynfield Development. Bethlehem Housing Authority is planning on converting a public housing recreation building currently in PIC to Section 8 or Public Housing units.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><u>Goal One: Incorporate bar coding for inventory at our warehouse.</u> Jay reported that this goal is dependent upon BHA’s software company. This is at a standstill right now, but will remain a goal.</p> <p><u>Goal Two: Collaborate with local agencies when advantageous to provide affordable housing services to our residents. Promote links to community services through BHA Community Centers and our FSS program, and at other sites to meet the changing needs of BHA residents, focusing on programs and services that enrich residents’ lives, promote independence, increase community involvement and support successful tenancies in public housing.</u> Jay reported this continues to be a goal, even throughout the pandemic.</p> <p><u>Goal Three: Continue to translate all key documents as they are created.</u> This will continue as a goal into the indefinite future. Zulma reported the Family Development office documents have been translated and a master file was created. Now that Zulma has transitioned to the High Rise office, she has translated the leasing packet and re-exam documents. Zulma is working on getting both the FDO and CHOO using the same documents to have consistency throughout public housing. Jay mentioned that we also use outside agencies when needed to translate documents into other languages.</p> <p><u>Goal Four: Continue to enforce the No Smoking Policy in BHA units and monitor designated smoking areas on BHA properties.</u> This is an ongoing mission. There have been some problems brought to BHA’s attention at Board meetings, specifically at the Bartholomew building. BHA is investigating those concerns and the police are monitoring the building.</p> <p><u>Goal Five: Continue discussions to expand the Authority’s BHA-TV notification program to the family developments.</u> Curt reported that he contacted Service Electric after August’s Board meeting, but he has not heard back yet. Curt explained the problem with Service Electric is that they are smaller than RCN and don’t have a dedicated business development staff. Curt has been dealing with one of the field engineers at Service Electric. Jay informed Roy that BHA is doing the best we can to provide BHA-TV to Lynfield and Parkridge.</p> <p><u>Goal Six: Continue renovating public housing properties and making capital improvements which promote fire and life safety as well as preserve the asset. Maintain high quality and timely design, bidding and construction, conserving energy and water and protecting the environment to the greatest extent feasible. Continue to actively involve residents, staff and the community in planning capital improvements. Promptly close out Capital Fund Recovery Grants. Apply for additional grants that may become available.</u> Curt explained there is an ongoing renovation in Lynfield that started a few months ago on 31 two-bedroom apartments. They are still working in the first six. At the last Board meeting, the final phase of Lynfield, which is 23 two-bedroom apartments was awarded. As of now, all the Lynfield units are renovated, in the process of being renovated, or under contract to be renovated. Parkridge and Pembroke will be the next two developments to be renovated. The elevators at Litzengerger were renovated and that job was completed about a month ago. Cameras were installed in Bodder, Bartholomew, and Monocacy, so now all four high rise buildings have cameras that can be accessed by John Lamana and the police. Cameras were also installed in the 4th floor office area at Monocacy.</p> <p><u>Goal Seven: Continue to maintain safety and security at all BHA housing and work sites for residents, staff, and the public. Promote non-violence in all aspects of BHA’s work. Continue to enhance safety and security efforts through community policing and physical improvements to properties.</u> John reported that Maintenance staff handle emergency calls and preventative maintenance issues on a daily basis. BHA has multiple COVID-19 policies in place to protect both tenants and staff. BHA keeps a list of tenants who report testing positive for COVID-19 to inform the Maintenance staff so they do not enter those units. John explained the police monitor all BHA properties and parking lots. The high rise buildings are policed on a daily basis. John said there have been some package thefts, but quite a few people have been caught thanks to the new cameras and the police. John also mentioned that BHA held vaccine clinics for the family developments and high rises. Kevin asked about the time schedule for the third COVID shot. John said he does not know but will be in contact with the Bethlehem Health Bureau. Jay asked John about how many tenants took advantage of the vaccine clinics provide by BHA, and John said there were 140 high rise tenants and 60 from the family developments. Zulma said she believes more tenants are vaccinated but may not have done so through the BHA clinics.</p> <p><u>Goal Eight: Maintain high utilization of vouchers and budget without exceeding authorized limits. Continue to advocate for full voucher funding and program reform, while preparing contingency plans for possible radical cuts in federal funding.</u></p>

	<p><u>Continue the HUD-Veterans Affairs Supportive Housing Program (VASH) and the Family Unification Program (FUP) with approved special vouchers, working with partner agencies to receive required referrals. Apply for more special purpose vouchers, incremental vouchers or preservation vouchers if offered by HUD.</u> Mirella reported that BHA has been issuing vouchers since November 2020. She reported many applicants can't find affordable housing. Mirella said between June and July, nine vouchers expired because applicants can't find housing. BHA has added some new voucher holders to the program, but at the same time other voucher holders move out or terminate their contract. Jay said that generally, the challenge is that landlords can get a higher rent from the public than what HUD will allow for a HAP contract. Jay explained that a proposal was just issued to HUD to raise the payment standards. The one bedroom apartments will be raised to \$939 and \$1196 for a two bedroom unit. The average rent in the Lehigh Valley area for a one bedroom apartment is \$1350, and for a two bedroom is \$1563. HUD is consistently about \$400 under the fair market rent for one and two bedroom units in the Lehigh Valley, which poses an extreme challenge for BHA. Mirella doesn't think the payment standard increase will help much for Section 8. The bottom line is that landlords want to make as much money as possible, which they can't do with Section 8. John mentioned that many landlords are also selling properties right now. Jay explained that there is an agreement between the housing authorities of Bethlehem, Allentown, Easton, Northampton County, and Lehigh County stating that tenants can rent apartments in any of these areas without having to port out from the original housing authority. Jay is thinking it may be beneficial if all five authorities come together to appeal to HUD about the housing challenges. Mirella said they have been in contact with the HUD representative for months with reports and information about the problems Section 8 is facing, but no help is being provided. Jay mentioned he is exploring the idea of using BHA owned property and constructing Section 8 units. Carlos mentioned he attempted to apply for different apartments on the Southside, and once he mentioned the voucher, the landlords did not want to rent to him and seem to be targeting high income individuals. Miriam mentioned that she has noticed apartments being rented within a few days of them coming on the market. Jay reported that the City Council approved a new plan, called LERTA, specifically for the Southside, stating that new buildings have to have a certain percentage of affordable housing units, and if not, developers have to donate \$25,000 per unit into a fund to be used for creating more affordable housing. Jay said the City is being very aggressive on this and BHA will try and partner with them to see what can be done. Jay mentioned that Mirella is planning on opening the Section 8 waiting list, but she is not sure how or when that will happen.</p> <p><u>Goal Nine: Update Admissions and Continued Occupancy (ACOP), Administration policy manual and BHA lease. Establish and maintain regular meetings with community partners in an effort to keep lines of communication open. Minimize confusion and misunderstanding while addressing changing policies that affect all.</u> The ACOP is continually updated as needed. Mirella mentioned that she plans on reviewing the ACOP with Miriam, Cindy, Zulma, and John to review the ACOP and update it as needed. She also plans on reviewing the Administrative Plan for the Section 8 department. She is considering having weekly meetings with the staff to discuss the updates. Jay mentioned that both the ACOP and Administrative Plan have digital copies as well, and outside agencies can be used to help with updating.</p> <p><u>Goal Ten: Convert physical tenant files into a digital format using computer software to prevent destruction of physical files, free up space in BHA buildings, and efficiently find requested documents in files.</u> Breanna commented that when COVID began, BHA created digital files for all the tenants. Staff began scanning and saving documents into the tenant digital files while working remotely. The goal is for the staff to begin scanning documents from the physical tenant files into the digital tenant files. Miriam and Breanna worked on a list of documents for the clerks to begin scanning into the digital tenant files while processing re-exams, including things like birth certificates, social security cards, applications, and a few other important items. Any other forms can be scanned as needed. Jay mentioned that these documents are in a secure digital format that are saved in BHA's computer system. Mirella mentioned Section 8 staff will be doing the same thing as FDO, and the TSO department has been fully digital for a few months now.</p>
<p>B.4</p>	<p>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.</p> <p>2021 – 2025 Five Year Action Plan was approved in the EPIC system on 3/26/21.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: N/A</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p>

	(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	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 <input type="checkbox"/> <input checked="" type="checkbox"/> 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 <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> (b) If yes, please describe:				
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 (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. <table border="1" style="width: 100%;"> <tr> <td>Fair Housing Goal:</td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> <tr> <td style="height: 150px;"></td> </tr> </table> <table border="1" style="width: 100%;"> <tr> <td>Fair Housing Goal:</td> </tr> </table>	Fair Housing Goal:	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>		Fair Housing Goal:
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A.1

Supporting Documents Available for Review for Five Year/Annual PHA Plans

PHAs are to indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

Applicable & On Display	Supporting Document	Related Plan Component
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans;</i>	5 Year and Annual Plans
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Streamlined Annual Plan</i>	Streamlined Annual Plans
X	<i>Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.</i>	5 Year and standard Annual Plans
	Fair Housing Documentation Supporting Fair Housing Certifications: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Housing Needs Statement of the Consolidated Plan for the jurisdiction(s) in which the PHA is located and any additional backup data to support statement of housing needs for families on the PHA’s public housing and Section 8 tenant-based waiting lists.	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP] and the Site-Based Waiting List Procedure.	Annual Plan: Eligibility, Selection, and Admissions Policies
X	De-concentration Income Analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. X Check here if included in the public housing A&O Policy.	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the method for setting public housing flat rents. X Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development. X Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. X Check here if included in Section 8 Administrative Plan.	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and Maintenance
X	Results of latest Public Housing Assessment System (PHAS) Assessment (or other applicable assessment).	Annual Plan: Management and Operations
N/A	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance and Community Service & Self-Sufficiency
X	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations
X	Any policies governing any Section 8 special housing types X Check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures X Check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures

Applicable & On Display	Supporting Document	Related Plan Component
X	Section 8 informal review and hearing procedures. X Check here if included in Section 8 Administrative Plan.	Annual Plan: Grievance Procedures
X	The Capital Fund/Comprehensive Grant Program Annual Statement /Performance and Evaluation Report for any active grant year.	Annual Plan: Capital Needs
N/A	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants.	Annual Plan: Capital Needs
N/A	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans, or any other approved proposal for development of public housing.	Annual Plan: Capital Needs
N/A	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing Section 504 of the Rehabilitation Act and the Americans with Disabilities Act. See PIH Notice 99-52 (HA).	Annual Plan: Capital Needs
N/A	Approved or submitted applications for demolition and/or disposition of public housing.	Annual Plan: Demolition and Disposition
N/A	Approved or submitted applications for designation of public housing (Designated Housing Plans).	Annual Plan: Designation of Public Housing
N/A	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act, Section 22 of the US Housing Act of 1937, or Section 33 of the US Housing Act of 1937.	Annual Plan: Conversion of Public Housing
N/A	Documentation for required Initial Assessment and any additional information required by HUD for Voluntary Conversion.	Annual Plan: Voluntary Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans.	Annual Plan: Homeownership
X	Policies governing any Section 8 Homeownership program (Section G of the Section 8 Administrative Plan)	Annual Plan: Homeownership
X	Public Housing Community Service Policy/Programs X Check here if included in Public Housing A & O Policy	Annual Plan: Community Service & Self-Sufficiency
X	Cooperative agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies.	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan(s) for public housing and/or Section 8.	Annual Plan: Community Service & Self-Sufficiency
X	Section 3 documentation required by 24 CFR Part 135, Subpart E for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G). X Check here if included in the public housing A & O Policy.	Annual Plan: Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under the Single Audit Act as implemented by OMB Circular A-133, the results of that audit and the PHA's response to any findings.	Annual Plan: Annual Audit
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)
N/A	Consortium agreement(s) and for Consortium Joint PHA Plans <u>Only</u> : Certification that consortium agreement is in compliance with 24 CFR Part 943 pursuant to an opinion of counsel on file and available for inspection.	Joint Annual PHA Plan for Consortia: Agency Identification and Annual Management and Operations

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U. S Department of Housing and Urban Development
	Office of Public and Indian Housing
	OMB 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, Robert J. Donchez, the Mayor, City of Bethlehem
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year 2022 of the Bethlehem Housing Authority 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



Bethlehem Housing Authority
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

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

The Bethlehem Housing Authority's Annual PHA Plan is consistent with the housing related goals Of the City of Bethlehem.

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 Executive Director: Jay D. Schuster	Name Board Chairperson: Iris Linares
 Signature	 Signature
Date 11-22-2021	Date 12-14-2021

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 OMB Control Number.

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

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

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

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 and/or X Annual 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 PHA fiscal year beginning 04/2022, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification 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.
5. The PHA made the proposed 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 Plan and invited public comment.
6. 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.
7. 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.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- 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 a 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 a waiting list is consistent with affirmatively furthering fair housing; and
 - 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 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. 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.
 12. 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.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the 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 PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Bethlehem Housing Authority
PHA Name

PA011
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 20 22

5-Year PHA Plan for Fiscal Years 20 - 20

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Name of Executive Director Jay D. Schuster

Name Board Chairman Iris Linares

Signature

 11-29-2021
Date

Signature

 12-14-2021
Date

C.3

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