U. S. Department of Housing and Urban Development



South Carolina State Office Strom Thurmond Federal Building 1835 Assembly Street Columbia, South Carolina 29201-2480

April 28, 2023

Ms. Bonita Shropshire
Executive Director
SC State Finance and Development Housing Authority
300-C Outlet Pointe Blvd.
Columbia, SC 29210

Dear Ms. Shropshire:

SUBJECT: 2023 Annual Public Housing Agency Plan Approval

This letter is to inform you that SC State Finance and Development Housing Authority's (SCSF&DHA's) Annual Plan (PHA Plan) submission (SC911v01) for the PHA Fiscal Year beginning July 1, 2023, is approved. Approval of the Annual Plan does not constitute an endorsement of the strategies and policies outlined in the Plan.

In providing assistance to families under programs covered by this Plan, the SCSF&DHA will comply with the rules, standards, and policies established in its approved Plan, as provided in 24 CFR Part 903 and other applicable regulations. Your approved Plan and all required attachments and documents must be made available for review and inspection at the principal office of the SCSF&DHA during normal business hours.

If you have any questions regarding your PHA Plan or the information in this letter, please contact Debbie Dusenbury, Portfolio Management Specialist, at (803) 765-5710 or Debra.M.Dusenbury@hud.gov.

Sincerely,

Digitally signed by: U.S. Government

Divi C = US O = U.S. Government OU = Department of

Rousing and Urban Development, Office of A

Eric Bickley Director

Public Housing Program Center

A RESOLUTION

ADOPTING THE PUBLIC HOUSING AGENCY PLAN AND ADMINISTRATIVE PLAN FOR USE BY THE AUTHORITY IN THE ADMINISTRATION OF THE SECTION 8 HOUSING CHOICE VOUCHER PROGRAM AND OTHER MATTERS RELATED HERETO.

WHEREAS, the Authority administers the Section 8 Housing Choice Voucher Program (the "Voucher Program") under an Annual Contributions Contract (ACC) with the United States Department of Housing and Urban Development (HUD) in seven counties (Clarendon, Colleton, Dorchester, Fairfield, Kershaw, Lee and Lexington) of the State of South Carolina; and

WHEREAS, HUD regulations require the Authority to develop a Public Housing Agency Plan ("PHA Plan") that describes the Authority's mission and long-range goals and objectives for achieving its mission over a five-year period as it relates to the Voucher Program, and its approach to managing and providing services within the program for the fiscal year beginning July 1, 2023; and

WHEREAS, HUD regulations also require the Authority to adopt a written Administrative Plan that establishes local policies for administration of the Voucher Program and to revise the plan, if needed, to comply with HUD requirements; and

WHEREAS, the staff of the Authority has, in the manner required by HUD, prepared its Annual PHA Plan and Administrative Plan for the Voucher Program and has made said Plans available for comment by members of the public in a manner consistent with HUD Regulations; and

WHEREAS, the PHA Plan and Administrative Plan prepared by the staff of the Authority is attached to this Resolution; and

WHEREAS, HUD regulations require that the Authority's PHA Plan and Administrative Plan for the Voucher Program be adopted by the Authority's Board of Commissioners;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE SOUTH CAROLINA STATE HOUSING FINANCE AND DEVELOPMENT AUTHORITY IN MEETING DULY ASSEMBLED: that the attached Public Housing Agency Annual Plan for Fiscal Year 2024 and Administrative Plan are adopted for use by the Authority in the administration of the Section 8 Housing Choice Voucher Program.

STATE OF SOUTH CAROLINA COUNTY OF LEXINGTON

I, the undersigned Secretary of the South Carolina State Housing Finance and Development Authority (the "Authority") **DO HEREBY CERTIFY** that the foregoing is a true, correct and verbatim copy of the Resolution duly adopted by the Authority at a duly called meeting held on March 15, 2023 at which meeting a quorum was present and acting throughout, which Resolution has been compared by me with the original thereof as recorded in the minute book of the Authority, and that said Resolution has not been modified, amended or repealed and is in full force and effect on the date hereof in the form attached hereto.

WITNESS MY HAND this 21st day of March, 2023.

Bonita Shropshire

Secretary, South Carolina State Housing Finance and Development Authority

Streamlined Annual PHA Plan (HCV Only PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

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 <u>both</u> 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 and SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.						
A.1	PHA Name: South Carolina State Housing Finance and Development Authority PHA Code: SC911 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2023 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 2082 PHA Plan Submission Type: ☐ Annual Submission ☐ Revised Annual Submission Availability of Information. In addition to the items listed in this form, 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. SC Housing's 5-year plan and annual plans are available to the public at the physical address, 300-C Outlet Pointe Blvd, Columbia, SC 29210. Digital copy is also available on the agency website: https://www.schousing.com/Home/RentersVoucherAdministration.						
	PHA Consortia: (Check b	ox if submitting	a joint Plan and complete table bel				
	Participating PHAs PHA Code Program(s) in the Consortia Program(s) not in the Consortia No. of Units in Each Program						
	Lead HA:						

В.	Plan Elements.
B.1	Revision of Existing PHA Plan Elements. a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission? Y N
B.2	New Activities. – Not Applicable

B.3	Progress Report.			
	Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.			
	The South Carolina State Housing Finance and Development Authority has made the following progress in meeting and exceeding the goals a objectives described in the previous Five-Year Plan as follows: 1. Continued the identification and selection of affordable housing opportunities and options through enhanced community outreach. We host online Housing Opportunities webpage to provide access to several search databases of affordable housing (https://voucheronline.schousing.com/housingopportunities.aspx). SC Housing is updating an Authority sponsored free affordable housing sewebsite database (SCHousingSearch.com) that allows program applicants/participants to search for and locate affordable housing that meets to needs. Phase 2 is coming in 2023 to allow landlords interested in participating in the Housing Choice Voucher Program to list their properties.			
	2. Although waivers were provided by HUD for the SEMAP assessment due to the COVID-19 pandemic, we continued to improve the quality of assisted housing through numerous intense quality control initiatives as we have used in previous years. Pursuant to PIH NOTICE 2021-34, Issued: December 9, 2021, we requested and received approval to waive application of SEMAP and our FY2020 score of 100% will carry forward for FY2023, giving SC Housing a "High Performer" rating for the twenty-second consecutive year, consistently exceeding HUD's 95% family record reporting requirement.			
	3. Increased customer satisfaction by exceeding the Authority's goal of 90% landlord and participant satisfaction for the nineteenth consecutive year with an average combined rating of 95.5%.			
	4. Maintained a strong partnership with South Carolina Department of Health and Human Services, through a contractual agreement, with the implementation and administration of a rental subsidy program under the Home Again Program to re-integrate families transitioning out of institutions back into the community.			
	5. Continued to educate participants and landlords concerning the VAWA protections, rights and obligations. An emergency transfer plan was also adopted which incorporates the contact information for the local organizations aiding victims of domestic violence throughout the State of South Carolina. These changes were incorporated into the HCVP Administrative Plan and added to SC Housing's website along with the brochures that were developed by the South Carolina Governor's Domestic Violence Task Force.			
	6. Continued implementation of software that provides online access to applicants, participants and landlords. Applicants can apply for assistance, monitor position on waiting list and update household information. Participants are able to communicate with caseworkers, upload documents and complete re-examinations on-line. Owners can monitor inspections, view payment information and communicate with caseworkers.			
	7. Implemented the use of an electronic signature software to allow completion and execution of required program forms in this post-COVID world. Implementation of this software helps expedite voucher issuance, leasing and annual re-examination process.			
	8. Collaborated with SC Housing's mortgage production department to create webpage for the HCV Homeownership Program. This site provides information for statewide use and includes information for a down payment assistance program.			
	9. SC Housing employees continue to face challenges in the post-pandemic housing market and focus on becoming trained and knowledgeable in technology provided to provide quality and timely service to the Housing Choice Voucher participants and the citizens of the State of South Carolina.			
	10. Continued to identify and promote program utilization of targeted funding vouchers to allow housing assistance for families that may be facing greater risks in the post-pandemic housing market.			
	11. Successfully created and managed the Emergency Housing Vouchers (EHV) team to fast track utilization of these vouchers in our communities. We continue to grow strong partnerships with local Continuums of Care (CoCs), community action agencies and landlords to support families utilize the EHV program.			
	12. There were no findings in our FY2022 financial audit.			
B.4	Capital Improvements. – Not Applicable			
B.5	Most Recent Fiscal Year Audit.			
	(a) Were there any findings in the most recent FY Audit?			
	Y N N/A			

(b) If yes, please describe:

C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan? Y N □ ⊠
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N If yes, include Challenged Elements.
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 the PHA is required to submit an AFH, the PHA is not obligated to complete this about. The PHA will fulfill property less the requirements of 24 CFR § 903.7(c) enceted prior to August 17, 2015. So Instructions for

further detail on completing this item.

Fair Housing Goal: Not Applicable – See Instructions

Describe fair housing strategies and actions to achieve the goal - N/A

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 07/2023, 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);

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- 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).

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South Carolina State Housing Finance and Deve PHA Name	elopment Authority	SC 911 PHA Number/HA	Code
X Annual PHA Plan for Fiscal Year 2024			
5-Year PHA Plan for Fiscal Years 20	20		
I hereby certify that all the information stated herein, as well as any info prosecute false claims and statements. Conviction may result in criminal			
Name of Executive Director Bonita Shropshire	Name Board Chairn	nan C. Todd Latiff	
Bonita Shropshie 03/21/202		MAH	03/21/2023 Date
	Page 2 of 3	form HUD-50077-	ST-HCV-HP (3/31/2024)

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related aws and regulations including PHA plan elements that have changed.				
blic reporting burden for this information collection is estimated to average 0.16 sting data sources, gathering and maintaining the data needed, and completing a spondents are not required to complete this form, unless it displays a currently va	nd reviewing the collection of information.	time for reviewing instructions, searching HUD may not collect this information, and		
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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, <u>B</u>	onita Shropshire	, the	Exe	ecutive Director	
	Official's Name			Official's Title	
	he 5-Year PHA Plan he <u>South Carolina State</u>		nce and Devel		
	nted Plan or State Cons Choice or Assessment				ediments (AI) to
Clarendon, C Carolina	olleton, Dorchester, Fa	irfield, Kersha	w, Lee and I	exington Countie	es of South
		Local Jurisdie	ction Name		
pursuant to 24	4 CFR Part 91 and 24 C	CFR §§#903.7	(o)(3) and 90	3.15.	
Provide a des State Consoli	cription of how the PH dated Plan.	A Plan's conte	ents are consis	stent with the Con	nsolidated Plan or
The PHA Pla	n is consistent with the	State of South	Carolina's C	Consolidated Plan	(Plan) and AI as
the South Car	olina State Housing Fi	nance and Dev	elopment Au	thority is a major	contributor to the
development	of the Plan and the asso	ociated analysi	s contained th	nerein. The PHA	therefore applies
_	ls and objectives in its ice Voucher Program (of the PHA Pl	an and in the adm	ninistration of the
	the information stated herein, as well a and statements. Conviction may result i				
Name of Executive Dir Signature	ector: Bonita Shropshire L Shropshire	03/21/2023 Date	Name Board Cha	irperson: C. Todd I	03/21/2023 Date
The United States Dep	artment of Housing and Urban Devel	opment is authorized to	o solicit the informati	on requested in this form by	virtue of Title 12, U.S.

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.