



**U.S. Department of Housing and Urban Development**

Omaha Field Office  
Edward Zorinsky Federal Building  
1616 Capitol Avenue, Suite 329  
Omaha, Nebraska 68102-4908

September 1, 2023

Ms. Joanie Poore  
Chief Executive Officer  
Omaha Housing Authority  
1823 Harney Street  
Omaha, NE 68102  
Sent via email: [JPoore@ohauthority.org](mailto:JPoore@ohauthority.org)

Dear Ms. Poore:

This letter is to inform you that the Omaha Housing Authority's (OHA), PHA Code NE001, Amended Annual Public Housing Agency Plan (Plan) submission for the Fiscal Year beginning January 1, 2023, is approved. This approval of the Plan does not constitute an endorsement of the strategies and policies outlined in the Plan. In aiding families under programs covered by the Plan, OHA will comply with the rules, standards, and policies established in its approved Plan, as provided in 24 CFR Part 903 and other applicable regulations.

The OHA's Plan and all required attachments and supporting documents must be made available for review and inspection at the principal office of the OHA and the public housing management offices listed in the Plan, during normal business hours. Please ensure the Plan is reasonably accessible to the public. A copy of this approval letter and at least one copy of the approved Plan may also be provided to each Resident Advisory Board (RAB) member.

If you have any questions regarding your Plan or the information in this letter, please contact Ms. Felicia Jackson, Portfolio Management Specialist, at [Felicia.Jackson@hud.gov](mailto:Felicia.Jackson@hud.gov) or (402) 492-3153.

Sincerely,

9/1/2023

X 

Julie Steadman

Supervisory Management Analyst

Signed by: JULIE STEADMAN

cc: Mr. David Levy, Board Chairperson, [dlevy@bairdholm.com](mailto:dlevy@bairdholm.com)

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
--	---	--

**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	<b>PHA Name:</b> <u>Omaha Housing Authority</u> <b>PHA Code:</b> <u>NE001</u> <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>01/2023</u> <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) <b>Number of Public Housing (PH) Units</b> <u>2,501</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>5,136</u> <b>Total Combined Units/Vouchers</b> <u>7,637</u> <b>PHA Plan Submission Type:</b> <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission				
	<b>Availability of Information.</b> 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.				
	OHA’s Annual Plan for 2023, including all related documents and information, is available upon request at OHA’s main office at 1823 Harney Street. OHA’s plan documents also are available upon request at any OHA public housing property management office:				
	Florence Tower (5100 Florence Blvd) Underwood Tower (4850 Underwood Ave) Evans Tower (3600 N. 24 <sup>th</sup> Street) Benson Tower (60 <sup>th</sup> & NW Radial Hwy) Crown Tower (5904 Henninger Ave) Jackson Tower (600 S. 27 <sup>th</sup> Street)		Kay Jay Tower (4500 S. 25 <sup>th</sup> Street) Park North & South (1501 Park Ave) Highland Tower (2500 B Street) Pine Tower (1500 Pine Street) Southside Terrace (5529 S. 30 <sup>th</sup> Street) Chambers Court (2110 N. 16 <sup>th</sup> Street)		
	<input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)				
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
					PH
					HCV
	Lead PHA:				

<b>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y    N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p>OHA made no policy changes in 2022 and recommends no changes for 2023. OHA's deconcentration analysis is provided in Attachment B.1.c.</p> <p><b>OHA PUBLIC HOUSING PROGRAM POLICIES &amp; POLICY CHANGES:</b> In December 2021, OHA completed revision of its Admissions and Continued Occupancy Policy (ACOP) to transition to the Nan McKay model template but with adaptations appropriate to our local community needs and practices. During 2023, OHA may make policy changes related to admissions and transfer preferences and priorities related to relocation. In 2023, OHA is revising its ACOP policies to implement HUD's over-income rules. In addition, during 2023 OHA plans to implement an elderly preference for admission to its 4 designated housing developments.</p> <p><b>OHA HCV PROGRAM POLICIES &amp; POLICY CHANGES:</b> During 2022, OHA has not made policy changes pertaining to eligibility, selection, admissions, rent determination, or organization of the waiting list. During 2023, in anticipation of the next wait list opening, OHA expects to make policy changes including technical/procedural changes and other changes related to organization of the waiting list and preferences. During 2023, OHA may make policy changes related to admissions and preferences and priorities related to relocation.</p> <p><b>PLANNED REVISION OF PBV POLICIES:</b> OHA intends to revise its policies for the project-based voucher (PBV) program in accord with statutory and regulatory changes including the Housing Opportunity Through Modernization Act (HOTMA) and HUD PIH Notice 2017-21.</p> <p><b>POLICY REVISIONS FOR RAD CONVERSIONS:</b> OHA may revise its ACOP and Administrative Plan policies to implement policy changes in accord with HUD requirements for RAD conversions, as described in Attachment B.2 and its attached HUD requirements for resident rights and protections.</p> <p><b>PLANNED REVISION OF OHA'S PUBLIC HOUSING LEASE:</b> OHA is in the process of revising its public housing lease including all addenda. OHA does not anticipate that lease revisions will require new policy changes pertaining to eligibility, selection, admissions, rent determination, or organization of the waiting list, with the exception of any changes required by HUD regulations and already incorporated into OHA's ACOP. OHA's lease revisions will be implemented in accord with notice and other requirements of HUD regulations at 24 CFR § 966.</p> <p><b>VAWA POLICIES:</b> OHA has implemented policies and procedures in accord with the VAWA Reauthorization Acts and HUD implementing regulations. For the public housing program, OHA's VAWA policies are provided in the ACOP Chapter 16. For the Section 8/Housing Choice Voucher program, OHA's VAWA policies are provided in the Administrative Plan Chapter 16. These VAWA policies are provided in Attachment B.1.a. This attachment also contains OHA's forms and informational documents.</p> <p><b>SUBSTANTIAL DEVIATION &amp; SIGNIFICANT AMENDMENT OF OHA'S PLANS:</b></p> <p>OHA defines a "substantial deviation" as a change in the mission, goals, or objectives stated in OHA's approved Five-Year Agency Plan.</p> <p>OHA defines a "significant amendment or modification" to its agency plan to mean changes to rent or admissions policies or organization of the waiting list, with the exception of PBV project-specific preferences and selection criteria. A significant amendment or modification also includes addition of non-emergency work items, changes in the use of replacement reserve funds under the Capital Fund, and any changes with regard to demolition or disposition, designation, homeownership programs, or conversion activities.</p> <p>OHA is redefining its definitions of a substantial deviation and significant amendment to exclude the following RAD-specific items: (a) The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance; (b) Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds; (c) Changes to the construction and rehabilitation plan for each approved RAD conversion; and (d) Changes to the financing structure for each approved RAD conversion.</p>

**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

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.   | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.  | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.   | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.   |   |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.   | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.  | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers.  | See DEVELOPMENT & REPOSITIONING ACTIVITIES, below |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.   |   |
| <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |   |

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

**DESIGNATED HOUSING:** OHA's designated housing plan includes 480 units in 4 developments targeted to persons who are elderly (age 62 or older) or near-elderly (age 50-62). OHA's designated housing plan was initially approved in 1997. It was renewed in 2021 with no change. OHA does not intend to make any changes to its Designated Housing Plan. During 2023, OHA intends to request renewal of the designated housing plan.

Development	Development #	Total Units	% Designated	# Designated
Kay Jay Tower	NE001-000005	117	100%	117
Evans Tower	NE001-000006	110	100%	110
Underwood Tower	NE001-000014	104	100%	104
Crown Tower	NE001-000015	149	100%	149
Public Housing Totals		2,703	18%	480

**OCCUPANCY BY OVER-INCOME FAMILIES:** OHA is implementing policy changes in accord with HUD regulations and guidance. Attachment B.2 provides selections from OHA's ACOP pertaining to over-income policies. See in particular Section 13-II.J at pages 37-38 of the attachment.

**UNITS WITH APPROVED VACANCIES FOR MODERNIZATION:** OHA will continue to request HUD approval of vacant units that require modernization and/or significant capital improvements in order to reoccupy such units.

**OTHER CAPITAL GRANT PROGRAMS:** OHA has 2020 and 2021 Emergency Safety and Security Grants, as well as a HUD 2019 Lead Hazard Reduction grant. OHA will use these and any other capital grant program funds in accord with HUD requirements & its HUD-approved Five-Year Action Plan for the CFP Program.

**DEVELOPMENT & REPOSITIONING ACTIVITIES**

**CHOICE NEIGHBORHOODS REDEVELOPMENT: SPENCER HOMES & NORTH 30<sup>TH</sup> ST NEIGHBORHOOD:** In 2019, OHA and partners including the City of Omaha were awarded a \$25 million Choice Neighborhoods Implementation (CNI) grant for revitalization of the North 30th Street neighborhood including OHA's public housing development, Spencer Homes. Spencer Homes is OHA's second oldest existing public housing development, built in the 1940s, with 111 units. During 2022, all residents were relocated. At present, all Spencer units are vacant, pre-demolition activities are in progress, and demolition is beginning. New construction will be conducted in phases. LIHTC funding applications are in process for the initial phases of construction. Per LIHTC requirements and CNI terms, new construction will be owned by one or more LLCs including the LIHTC private investors funding the construction. OHA may continue to pursue acquisition of other properties in the neighborhood in support of the CNI redevelopment plan. OHA and its partners will pursue all available funding and resources for revitalization, including mixed finance opportunities, private funding, commitment of project-based voucher funding, RAD conversion, and any other resources and opportunities to support this neighborhood revitalization.

**CHOICE NEIGHBORHOODS REDEVELOPMENT: SOUTHSIDE TERRACE & NEIGHBORHOOD:** Southside Terrace is OHA's oldest existing public housing development, built in 1943, with 378 public housing units and accoutrement buildings. In 2019, OHA and partners including the City of Omaha were awarded a \$1.3 million Choice Neighborhoods Planning grant for planning revitalization of the Southside Terrace and Indian Hills neighborhood. In September 2022, OHA and its partners were awarded a \$50 million Choice Neighborhoods Implementation (CNI) grant for this revitalization project. Redevelopment will involve demolition in phase of all existing units and buildings on the Southside Terrace property. Redevelopment will require relocation of existing resident in phases. New construction will be conducted in phases and will include LIHTC funding. Off-site redevelopment is planned for OHA's Arbor Villa site, which will require relocation of residents and demolition of the present buildings. Per LIHTC requirements and CNI terms, new construction will be owned by one or more LLCs including the LIHTC private investors funding the construction. OHA may pursue acquisition of other properties in the neighborhood in support of the CNI redevelopment plan. OHA and its partners will pursue all available funding and resources for revitalization, including mixed finance opportunities, private funding, commitment of project-based voucher funding, RAD conversion, and any other resources to support this neighborhood revitalization.

**REPOSITIONING & DISPOSITION OF SCATTERED SITE UNITS:** OHA's housing stock includes a large number of scattered site public housing units, including more than 600 single family homes, duplexes, and small developments. OHA's scattered site units are disproportionately costly, in part because of the distance between units and, more so, because of the lack of standardization of systems and features and parts. These factors increase costs for maintenance and capital improvements. In addition, the age of some of OHA's scattered site units increases costs. OHA staff is evaluating its entire portfolio of scattered site units to identify properties appropriate for disposition because of disproportionate costs, capital needs, or related reasons. Attachment B.2.ss provides a list of OHA scattered site units and small developments being reviewed for repositioning options. OHA staff aims to complete its review and repositioning activities as soon as possible, ideally within the next 12-24 months.

OHA will not retain properties identified as having disproportionate maintenance costs and capital needs. OHA's review prioritizes retention of units west of 72nd Street; UFAS accessible units; other units that are well-suited for persons with mobility impairments; and 2-bedroom and 4+-bedroom units based on the demand from OHA's wait list and transfer list. For properties determined to be retained in OHA's affordable housing stock, OHA intends to pursue Section 18 disposition to an OHA controlled affiliate, River City Housing; removal of the properties from the public housing program; and conversion to project-based voucher assistance. OHA will consider and pursue all options for effective asset management of properties retained, which may include Section 18 disposition, RAD conversion, conversion to tenant-based assistance, project-based vouchers, mixed finance redevelopment, privately-financed redevelopment, or other repositioning options.

For scattered site units identified for disposition and removal from OHA's housing stock, OHA will pursue HUD Section 18 approval to sell units on the private market, however OHA is willing to consider negotiated agreements for disposition to nonprofit affordable housing providers at appraised value.

**REPOSITIONING & POSSIBLE DISPOSITION OF HIO LIHTC PROPERTIES:** OHA's housing stock includes LIHTC properties that have proven disproportionately costly to maintain, in particular specific historic properties, the Securities Building, Chambers Court, and the Farnam Building. These are LIHTC mixed-finance properties owned by OHA's affiliate, Housing in Omaha, Inc. (HIO), and managed by OHA, and acquired as part of OHA's resolution of the *Hawkins* lawsuit. These properties consistently operate with significant deficits totaling hundreds of thousands of dollars each year. OHA is evaluating repositioning options for all of its HIO LIHTC properties, including Section 18 disposition, mixed-finance redevelopment, commitment of project-based voucher funding, RAD conversion, and any other available resources and opportunities.

The Securities Building was OHA's top priority because of its deficits and the feasibility of disposition. This property was sold in August 2022.

Chambers Court is OHA's next priority because of its continued deficits. OHA is considering options for disposition of the property and plans to submit a Section 18 application for HUD approval of disposition. OHA is evaluating any and all repositioning options for Chambers Court, as well as the Farnam Building, including negotiations with NIFA regarding qualified contract options; Section 18 disposition options; private grant funding; mixed-finance redevelopment, commitment of project-based HCV voucher funding, RAD conversion, and any other available resources and opportunities.

NOAH, Crown 1, and Crown 2 are HIO LIHTC developments comprised of 52 single-family homes. In OHA's review of its scattered-site single-family homes OHA has determined that these units should be retained in OHA's affordable housing portfolio. During 2022-2023, OHA intends to submit Section 18 disposition applications for disposition to OHA's controlled affiliate, River City Housing; removal of units from the public housing program; applications for TPV replacement vouchers; and conversion to project-based voucher funding under the HCV program. There are 10 units that may not be approved for Section 18 disposition as scattered site units (because there are 5 units on a block, and HUD's definition of "scattered site" units is limited to 4 or fewer contiguous units or units on the same block). If these units are not approved for Section 18 disposition and conversion to project-based voucher funding, then OHA may retain these units in its public housing portfolio and will consider any available repositioning options including RAD conversion or any alternate means of conversion to PBV funding. OHA also notes there are NIFA terms on the Crown 1 and Crown 2 properties that may restrict disposition and thus may require OHA to defer or change repositioning plans for these properties.

Bayview (12 units) and Keystone Crown (37 units) are OHA LIHTC developments that OHA wishes to retain in its affordable housing portfolio. OHA proposes RAD conversion of these developments together with 3 single-family homes located on the Keystone Crown site (8715, 8765, & 8771 Sahler Street).

**PROPOSED RAD CONVERSIONS:** OHA's repositioning efforts may include RAD conversion. Properties to be converted through RAD will be transferred to OHA's owned and controlled affiliate, River City Housing. Attachment B.2.rad provides information regarding OHA's proposed RAD conversions.

**RHF DEVELOPMENT: PARK VILLA:** OHA had accumulated Replacement Housing Factor (RHF) funds for development of new public housing units. In 2021, OHA submitted and HUD approved a Development Proposal to use the RHF grant funds to purchase Park Villa for renovation and conversion to public housing. During 2021, Park Villa was sold by HIO to OHA, and all RHF grant funds were timely expended. At present, exterior renovations are near completion, and interior renovations are beginning in the vacant units. Roughly half the units are vacant, and roughly half are occupied by tenants with HCV vouchers. OHA intends to complete interior renovations in all units during 2022. OHA has provided 90-days' notice to all current tenants, including notice of conversion to public housing. Existing residents are offered relocation assistance as required by federal law and HUD regulations, including the opportunity to move to a renovated unit within the Park Villa development, or use of their voucher in the private market. OHA is planning for DOFA of 12/31/2022, and we will update HUD as work progresses.

**REPOSITIONING OF OTHER OHA PROPERTIES:** As OHA reviews its portfolio, OHA intends to implement repositioning of other OHA properties, including OHA's high-rise tower developments. OHA's long-term plans for management and repositioning of these properties may include market disposition; disposition to OHA's new controlled affiliated agency, River City Housing; redevelopment; RAD conversion; conversion to tenant-based assistance; project-based vouchers; mixed finance redevelopment; privately-financed redevelopment. OHA may pursue any other funding or opportunities or other repositioning options available.

**TIMBERCREEK REPOSITIONING:** Timbercreek is a 180-unit affordable housing development in southwest Omaha owned and operated by Mercy Housing that includes 45 public housing units administered by OHA. The Timbercreek property has operated with significant deficits and is in need of modernization. Mercy Housing and its partners and affiliates plan LIHTC-funded renovations of the Timbercreek development. OHA supports this redevelopment process. The Timbercreek property is particularly valuable to OHA's affordable housing stock because of its location in southwest Omaha. OHA's role in the Timbercreek redevelopment may include acquiring an ownership interest in the development; acquisition of land with a long-term ground lease to Mercy Housing; conversion to tenant-based and or project-based voucher assistance; administration of tenant-protection vouchers; allocation of project-based vouchers; and/or other actions to support Timbercreek's redevelopment and financial viability. At present, OHA and Mercy Housing are preparing to submit a Section 18 application to HUD which would provide for disposition and removal of the 45 public housing units from the public housing portfolio and conversion of units to project-based assistance.

**DISPOSITION OF OHA'S FORMER CENTRAL OFFICE PROPERTY & ADJACENT PROPERTIES:** OHA's former central office building, located at address 540 S 27<sup>TH</sup> Street (next door to Jackson Tower), has been vacant and unused since 2015. OHA is planning disposition of this property, as well as 3 adjacent vacant lots, to Youth Emergency Services (YES), a local nonprofit organization that serves homeless youth. OHA and YES have entered into an MOU and Option Agreements regarding the transaction and development plans. In August 2022, OHA submitted a Section 18 disposition application to HUD for approval of the sale to YES. This sale would be at a price below market value due to the commensurate public benefit.

**ACQUISITION OF MAINTENANCE SHOP:** OHA is considering options for acquisition of a facility to support maintenance operations (staff, supplies and equipment) servicing public housing properties.

**POSSIBLE DISPOSITION OF VACANT LOTS:** OHA owns a number of vacant properties throughout the City. OHA may pursue sale of vacant lots which are not planned for new construction.

**DISPOSITION OF LAND TO CITY OF OMAHA:** The City of Omaha requires OHA disposition of a small corner of land (376 sf) at 48<sup>th</sup> and Y Streets for City street improvements. OHA anticipates it is necessary for OHA to submit a Section 18 application for HUD approval of this disposition. The address of this unit is 4805 Y Street.

<b>B.3</b>	<p><b>Progress Report.</b></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>OHA's progress report is provided in Attachment B.3.</p>
<b>B.4</b>	<p><b>Capital Improvements.</b> 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>See OHA's Capital Fund 5-Year Action Plan in EPIC approved by HUD on March 21, 2022.</p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>OHA's most recent audit is for FY2020. There was one finding. See Attachment B.5. Beginning with this FY2020 audit, OHA contracted with a new firm. OHA found that the predecessor auditor firm didn't provide audit adjustments necessary to reconcile FY2020 beginning net positions to the prior year audited financial statements. OHA has implemented a process of strengthening the internal controls over financial reporting to address this issue. The FY2020 audit had no findings or questioned costs relating to federal awards.</p>
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></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> <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.</p> <p>Attachment C.1 provides documentation of OHA's consultation with its RAB.</p>
<b>C.2</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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.</p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>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.</p>
<b>C.4</b>	<p><b>Challenged Elements.</b> 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>
<b>C.5</b>	<p><b>Troubled PHA.</b></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 type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D.	<b>Affirmatively Furthering Fair Housing (AFFH).</b>						
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p><b>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.</b></p> <p>On June 10, 2021, HUD published an Interim Final Rule restoring certain definitions and certifications related to former requirements for affirmatively furthering fair housing (AFFH). HUD has indicated that, in the future, HUD intends to expand its AFFH requirements and to include new requirements regarding development of an Assessment of Fair Housing (AFH). HUD has not yet implemented these requirements.</p> <p>While these changes are in process, PHAs are not required to report AFFH plans here, in this Annual Plan. As stated in the instructions above, “Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart.”</p> <p>OHA’s current policies, procedures, and practices comply with the Interim Final Rule. OHA supports statutory and moral goals to affirmatively further fair housing. OHA will comply with changes in HUD regulations and requirements as these are established, in accord with HUD requirements.</p> <table border="1" data-bbox="181 766 1453 875"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> </table> <table border="1" data-bbox="181 903 1453 1026"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> </table> <table border="1" data-bbox="181 1052 1453 1171"> <tr> <td><b>Fair Housing Goal:</b></td> </tr> <tr> <td><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></td> </tr> </table>	<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>	<b>Fair Housing Goal:</b>	<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>
<b>Fair Housing Goal:</b>							
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>							
<b>Fair Housing Goal:</b>							
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>							
<b>Fair Housing Goal:</b>							
<u><i>Describe fair housing strategies and actions to achieve the goal</i></u>							