Annual PHA Plan (Standard PHAs and Troubled PHAs)

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-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.

Α.	PHA Information.					
A.1	Number of Public Housing (I Total Combined Units/Voucl PHA Plan Submission Type: Availability of Information. location(s) where the proposed available for inspection by the and main office or central office encouraged to provide each result of the encouraged encouraged to provide each result of the encouraged encourage	A Troublect Trou	PYYYY): 01/2024_ ons Contract (ACC) units at time of 01 Number of Housing Choice bmission Revised An e the elements listed below readily. A Plan Elements, and all information inimum, PHAs must post PHA Plan PHAs are strongly encouraged to p copy of their PHA Plans. ted documents and information, is HA's plan documents also are available. The street of the street	e Vouchers (HCVs) 5,156 nual Submission available to the public. A PHA on relevant to the public hearing its, including updates, at each Assost complete PHA Plans on their available upon request at OHA's lable upon request at any OHA public North & South (1501 Park Ave) its North & South (1501 Park Ave) its Tower (1500 Pine Street) thought of the Street (1500 Pine Street) this de Terrace (5529 S. 30th Street mbers Court (2110 N. 16th Street)	and proposed PF set Management r official website. s main office at 15 property manage et)	HÅ Plan are Project (AMP) . PHAs are also 823 Harney Street ment office:
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia		n Each Program
				Consorua	PH	HCV
	Lead PHA:					

В.	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 (VAWA) □ 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): Please see below.
	(c) The PHA must submit its Deconcentration Policy for Field Office review.
	OHA's deconcentration analysis is provided in Attachment B.1.c.
	POLICY CHANGES THAT GOVERN ELIGIBILITY, SELECTION, ADMISSIONS, & RENT DETERMINATIONS: During 2023 and 2024, OHA's Public Housing and HCV programs will implement policy changes in accord with the Housing Opportunity Through Modernization Act of 2016 (HOTMA), HUD PIH Notice 2023-27, and any other HUD regulations and guidance.
	POLICY REVISIONS FOR RAD & PBV CONVERSIONS : OHA intends RAD and PBV conversions during 2024. OHA will develop policies, including changes to OHA's ACOP and Administrative Plan, in accord with HUD regulations & requirements for RAD & PBV programs.
	PUBLIC HOUSING LEASE REVISIONS: OHA has revised its public housing lease. OHA's lease revisions are being implemented in accord with notice and other requirements of HUD regulations at 24 CFR § 966.
	VAWA POLICIES: OHA has implemented policies and procedures in accord with the VAWA Reauthorization Acts and HUD implementing regulations. OHA's VAWA policies are provided in the public housing ACOP Chapter 16 and HCV Administrative Plan Chapter 16. These VAWA policies are provided in Attachment B.1.a. This attachment also contains OHA's forms and informational documents. OHA will implement changes to its VAWA policies and reporting in accord with requirements of the VAWA reauthorizations and HUD implementing regulations and guidance, including policy and reporting changes from the 2022 VAWA reauthorization.
	DEFINITIONS OF SUBSTANTIAL DEVIATION & SIGNIFICANT AMENDMENT OF OHA'S PLANS:
	OHA defines a "substantial deviation" as a change in the mission, goals, or objectives stated in OHA's approved Five-Year Agency Plan.
	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.
	OHA proposes to change its definition of "significant amendment" to exclude the language stricken above. The categorization of work order items is a local procedural matter already governed by HUD requirements & City codes.
	OHA's definitions of "substantial deviation" and "significant amendment" 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.

B.2 New Activities.

	ne PHA's current Fiscal Ver	following in the I	new activities related to the) Does the PHA intend to undertake an	a) Does
--	-----------------------------	--------------------	-------------------------------	---------------------------------------	---------

Y	N		
\boxtimes		Hope VI or Choice Neighborhoods.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
\boxtimes		Mixed Finance Modernization or Development.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
\boxtimes		Demolition and/or Disposition.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
	\boxtimes	Designated Housing for Elderly and/or Disabled Families.	
\boxtimes		Conversion of Public Housing to Tenant-Based Assistance.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
\boxtimes		Conversion of Public Housing to Project-Based Assistance under RAD.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
\boxtimes		Occupancy by Over-Income Families.	
	\boxtimes	Occupancy by Police Officers.	
	\boxtimes	Non-Smoking Policies.	
\boxtimes		Project-Based Vouchers.	See DEVELOPMENT & REPOSITIONING ACTIVITIES, below
\boxtimes		Units with Approved Vacancies for Modernization.	
\boxtimes		Other Capital Grant Programs (i.e., Capital Fund Community Facilities G	rants 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

DESGINATED HOUSING: OHA's designated housing plan was initially approved in 1997. OHA's designated housing plan currently 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 renewed in 2023 with no change. OHA does not intend to make any changes to its 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

projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

OCCUPANCY BY OVER-INCOME FAMILIES: OHA will continue implementation of policy changes in accord with HOTMA requirements and HUD regulations and guidance pertaining to occupancy by over-income families in the public housing program.

PROJECT-BASED VOUCHERS: OHA plans PBV conversions of public housing units and commitment of PBVs to its development projects, described in DEVELOPMENT & REPOSITIONING ACTIVITES, below.

In addition, OHA plans to issue an RFP to request proposals for OHA commitment of PBVs to rental units owned by private owners. OHA's purpose is to support OHA and community goals such as supporting neighborhood redevelopment efforts, supporting projects that provide supportive housing for persons with disabilities, and expanding affordable housing options in our community. OHA does not have a specific number limit of PBVs, but OHA's commitments will comply with HUD requirements, including limits on the number of HCV vouchers that may be committed to PBV projects. OHA's RFP would not be limited to specific neighborhoods or general locations within our jurisdiction. OHA's RFP and actions and any awards of PBVs will be conducted in accord with HUD regulations and guidance at 24 CFR Part 983 and PIH Notice 2017-21, as well as with civil rights requirements, Housing Quality Standards (HQS), deconcentration standards, and other HUD and federal requirements.

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 grant funds from the following Capital Fund grant programs: 2020 and 2021 Emergency Safety and Security grants; 2019 Lead Hazard Reduction grant; and a Capital Fund At-Risk/Receivership/Substandard/Troubled Program grant for Jackson Tower. OHA is in the process of applying for a new Capital Fund At-Risk/Receivership/Substandard/Troubled Program for work at the Farnam Building. 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 30TH 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. Relocation of all residents was completed in 2022. OHA received HUD approval for demolition of all units. However, demolition costs increased very significantly since the project was budgeted. All Spencer units west of the North Freeway (Highway 75) have been demolished. Spencer units east of the North Freeway (33 units) still remain to be demolished. OHA staff is working with the City to demolish the remaining buildings. Redevelopment is scheduled in phases and is proceeding according to plans. Highlander IV, which includes 37 Spencer replacement housing units, recently began leasing. Former Spencer residents have been notified of their right to lease the replacement units, and, at present, 16 former Spencer tenants are scheduled to move in Fall 2023. Kennedy Square East construction is progressing on schedule. Kennedy Square West closing is planned for 2024. Kennedy Square West will consist of 39 units plus commercial space in a four-story building. The project will be financed with a mix of 9% LIHTC, CDBG-DR funds, CCI funds and deferred developer fees, and OHA will provide 15 project-based vouchers. Per LIHTC requirements and CNI plans, new developments will be owned by one or more LLCs or other entities. OHA may retain ownership of the underlying lands or dispose of lands through sale or long-term ground lease to the owner entities. OHA may submit application(s) to HUD for approval for disposition in accord with the CNI revitalization plans. 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. OHA has committed to provide PBV vouchers to this project.

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 accourrement 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, HUD awarded OHA and its partners a \$50 million HUD Choice Neighborhoods Implementation (CNI) grant for this revitalization project. Southside Terrace is a large development, and redevelopment will be conducted in phases. Redevelopment will require relocation of all existing residents, in phases, and will require demolition, in phases, of all existing units and buildings on the Southside Terrace property. During 2023, OHA received HUD approval for demolition of all Southside Terrace units. New construction also will be conducted in phases. During 2023-2024, OHA plans a first phase in the southeast corner of the Southside Terrace property, which includes 2 existing buildings (16 units) with 13 tenants. Relocation activities have begun, and OHA anticipates relocation of residents during 2023, with demolition activities to begin in early 2024. This phase will consist of new construction of a 92-unit multi-family building and has received a 4% LIHTC award from NIFA. Financial closing is expected to occur in the first quarter of 2024. A next phase includes off-site development on OHA's Arbor Villa site (18 units). Relocation activities are beginning, and OHA anticipates relocation of residents by Summer 2024, with demolition activities to begin in Fall 2024. New construction on the Arbor Villa site will include 70 mixed income units, including replacement housing units. A next phase of redevelopment on the Southside Terrace property is in process in accord with the CNI redevelopment plans. Per LIHTC requirements and CNI plans, developments will be owned by one or more LLCs or other entities. OHA may retain ownership of the underlying lands or dispose of lands through sale or long-term ground lease to the owner entities. During 2023-24, OHA intends to submit application(s) to HUD for approval for disposition in accord with the CNI revitalization plans. 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 and opportunities to support this neighborhood revitalization. OHA has committed to provide PBV vouchers to this project.

RESPOSITONING & DISPOSITION OF SCATTERED SITE UNITS: OHA's housing stock includes a large number of scattered site public housing units, including more than 600 units in 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 scattered site portfolio to determine appropriate repositioning options. This review includes single-family homes in the NOAH, Crown I, and Crown II developments. OHA will pursue any repositioning options available, including Section 18 disposition, RAD conversion, project-based voucher conversion, mixed finance redevelopment, privately-financed redevelopment, or other repositioning options.

A first step is identifying properties appropriate for removal from OHA's inventory because of disproportionate costs, capital needs, or related reasons. During 2023, OHA began capital needs assessments of its scattered site properties to guide us in these decisions. 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 scattered site units identified for removal from OHA's inventory, OHA will pursue HUD Section 18 approval for disposition including market sale. OHA will consider negotiated agreements for disposition to nonprofit affordable housing providers at appraised value. For scattered site properties to be retained in OHA's inventory, OHA will pursue Section 18 applications for disposition to OHA's affiliate entity, River City Housing, and conversion to PBV assistance. Units that do not meet HUD definition of "scattered site" units may be retained as public housing units or alternately OHA may pursue RAD conversion.

During 2023-2024, OHA intends to submit Section 18 disposition applications for sale of units. OHA also intends to submit Section 18 applications for disposition to OHA's controlled affiliate, River City Housing, and PBV conversion of units. OHA also intends to submit applications for RAD conversion of units that OHA wishes to retain in its housing stock but that are not eligible for PBV conversion. This includes single-family homes and small properties that do not meet HUD's definition of "scattered site" units eligible for PBV conversion. OHA's portfolio includes a number of small multifamily properties. During 2023, OHA submitted application to HUD for RAD conversion of its Frances Court development, a small multifamily property with 14 units. See Attachment B.2.rad for a current list of properties proposed for RAD conversion beginning 2024.

Page 4 of 8

REPOSITIONING & POSSIBLE DISPOSITION OF HIO LIHTC PROPERTIES: OHA's housing stock includes LIHTC properties that have proven disproportionately costly to maintain. 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. Some properties consistently operate with significant deficits totaling hundreds of thousands of dollars each year, in particular, historic properties (Securities Building, Chambers Court, Farnam Building, and Bayview). OHA is evaluating repositioning options for all of its HIO LIHTC properties, including Section 18 disposition, mixed-finance redevelopment, RAD conversion, PBV conversion or other commitment of project-based voucher funding, and any other available resources and opportunities.

Securities Building (NE001000024): Disposition of the Securities Building was OHA's 1st priority. This objective is completed.

Chambers Court (NE001000021): Chambers Court is OHA's next top priority because the property operates with deficits of hundreds of thousands of dollars per year. This is a historic property, built in about 1905-1910. It has 70 total units including 32 public housing units. OHA acquired this property as part of OHA's resolution of the Hawkins lawsuit. The property was renovated with LIHTC funds in 2005 and is subject to LURA restrictions through 2045 and state restrictions on resyndication of tax credit funding until 2026. Throughout 2021-2022, OHA together with its co-developer, Brinshore Development, reviewed repositioning options that would allow OHA to retain Chambers Court in its affordable housing stock, including RAD conversion with renovations needed to address capital needs to reduce maintenance and operating costs. However, OHA and Brinshore ultimately determined that RAD conversion was not feasible, namely because the property would not be eligible for LIHTC funds necessary for renovations until 2026

OHA intends to pursue disposition of this property. At present, OHA is communicating with a potential buyer who would use the property for services and housing of refugee families. The Chambers Court property would continue to be subject to the LURA, which requires the property to be committed to providing affordable housing for low-income households through 2045. OHA staff has been communicating with HUD regarding possible disposition. One option is that OHA would replace 24 of the 32 existing public housing units by placing PBV voucher assistance in 10 non-ACC units at the Farnam Building and 14 North Villa units. This option would require use of up to 24 vouchers from OHA's HCV voucher stock. However, OHA staff notes that this disposition would not result in a net loss of affordable housing units in our community, as the Chambers Court units are committed by LURA to remain affordable units through 2045. In addition, OHA staff believes that disposition is necessary to end the ongoing large financial losses that have continued over years, that limit resources available to OHA's housing portfolio city-wide, and that jeopardize OHA's financial viability. An alternate disposition option might involve transfer of assistance. At present, OHA staff continues to seek guidance from its consultants and HUD to determine which option would best serve OHA's mission agency-wide and community-wide. During 2023-2024, OHA intends to submit a Section 18 disposition application to HUD.

Farnam Building (NE001000028): OHA staff is exploring repositioning options including RAD conversion of the Farnam Building without the use of LIHTC funding or partnering with an outside developer. Staff has assessed the physical needs and submitted a grant application for additional capital funds to assist with renovations. Ultimately, OHA expects to convert the building through RAD after the renovations have been completed. Depending on the outcome of Chambers Court plans, OHA may commit PBV vouchers to the 10 non-ACC units in the Farnam Building.

Bayview (NE001000027): OHA plans RAD conversion of Bayview in 2024.

NOAH (NE001000023): NOAH includes 24 single-family homes built by OHA in about 2005 in response to the Hawkins lawsuit. These are units that OHA wishes to retain in its affordable housing stock. During 2023-2024, OHA intends to submit a Section 18 application to HUD for conversion of NOAH units to PBV. (See OHA's plans for scattered site units.) Five NOAH units do not meet HUD's definition of "scattered site" units. OHA may retain these 5 units as public housing units or alternately OHA may pursue RAD conversion of these 5 units.

Crown I & Crown II (NE001000025 & NE001000026): Crown I and Crown II include 28 single-family homes built by OHA in about 2008 in response to the Hawkins lawsuit. These are units that OHA wishes to retain in its affordable housing stock. OHA intends to submit a Section 18 application to HUD for PBV conversion. (See OHA's plans for scattered site units.) Five units do not meet HUD's definition of "scattered site" units. OHA may retain these units as public housing units, or alternately OHA may pursue RAD conversion of these 5 units. OHA notes that Crown I and II units may be subject to NIFA requirements that may restrict disposition required by PBV or RAD conversions.

Keystone Crown (NE001000029): This is a 37-unit development that includes multifamily buildings as well as some single-family homes located in west Omaha. In addition, OHA's scattered site stock includes 3 single-family homes adjacent to the Keystone Crown units. These units were newlybuilt in early 2000s and are sited in a desirable West Omaha location. OHA wishes to retain the Keystone Crown and adjacent units in its affordable housing stock. OHA intends RAD conversion of Keystone Crown and the 3 adjacent units. OHA notes that the Keystone Crown units may be subject to NIFA requirements that may restrict disposition required by PBV or RAD conversions.

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 require Section 18 or other HUD applications and may include market disposition; disposition to OHA's new controlled affiliated agency, River City Housing; redevelopment; RAD conversion; conversion to tenant-based assistance; conversions to project-based vouchers; mixed finance redevelopment; privately-financed redevelopment. OHA may pursue any other funding or opportunities or other repositioning options available.

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. During 2023, OHA has submitted a RAD application for its Frances Court property. During 2024, OHA intends to submit RAD applications for multiple other properties where OHA determines that the property/units should be retained in OHA's inventory and that RAD conversion is the best repositioning option. 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. The project involved significant exterior and interior renovations. Renovations are scheduled to be complete about 09/30/2023. OHA expects that 95% of units will be leased by 12/31/2023, and the project will be converted to ACC public housing units and eligible for public housing funding beginning 2024. OHA considers future RAD conversion of Park Villa.

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 is undertaking 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. HUD approved a Section 18 disposition application for disposition and removal of the 45 public housing units from the public housing portfolio, for subsequent PBV conversion. OHA has committed 34 PBVs from its HCV housing stock, in addition to the 11 TPVs to be provided by HUD, to ensure continued affordability of the 45 units.

DISPOSITION OF OHA'S FORMER CENTRAL OFFICE PROPERTY & ADJACENT PROPERTIES: OHA's former central office building, located at address 540 S 27TH Street (next door to Jackson Tower), has been vacant and unused since 2015. OHA plans disposition of this property, as well as 3 adjacent vacant lots, to Youth Emergency Services (YES), a local nonprofit organization that serves homeless youth. In August 2022, OHA submitted a Section 18 disposition application to HUD for approval of the sale to YES at a negotiated price below market value due to the commensurate public benefit. HUD approved the disposition. At present, this sale is scheduled to close in October 2023.

SALE OF VACANT LOTS: OHA and HIO own a number of vacant properties throughout the City. During 2023-24, OHA may pursue sale of vacant lots which are not planned for new construction. This includes OHA's property at 550 S. 70th Street, formerly site of a public housing single-family home which was destroyed by fire and subsequently demolished, but which remains in OHA's public housing inventory and covered by a HUD DOT. During 2023-2024, OHA intends to submit a Section 18 application to HUD for disposition of this vacant lot.

DISPOSITION OF LAND TO CITY OF OMAHA: The City of Omaha requires OHA disposition of a small corner of land (376 sf) at 48th and Y Streets for City street improvements. This land is on the property of an OHA scattered site single-family home. OHA anticipates it is necessary for OHA to submit a Section 18 application for HUD approval of this disposition.

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.

В.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
	OHA's progress report is provided in Attachment B.3.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
	See OHA's Capital Fund 5-Year Action Plan in EPIC approved by HUD on September 28, 2023.
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N □
	(b) If yes, please describe:
	OHA's most recent audit is for FY2021. Attachment B.5 provides findings and OHA's response.
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.
	Attachment C.1 provides documentation of OHA's consultation with its RAB.
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.
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 □ ☑ □ (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.
	On June 10, 2021, HUD published an Interim Final Rule restoring certain definitions and certifications related to 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). While these changes are in process, PHAs are not required to report AFFH plans here in this Annual Plan, as stated above. OHA's current policies, procedures, and practices comply with the Interim Final Rule.
	On February 9, 2023, HUD published a proposed rule that provides for development of an Equity Plan, based on community planning processes, to identify fair housing issues and to establish priorities, goals, and strategies, which would be incorporated into OHA's Annual Plans. OHA supports the statutory and policy and ethical goals to affirmatively further fair housing in our community. OHA will implement HUD's processes for planning and reporting in accord with HUD regulations and guidance.
	Describe fair housing strategies and actions to achieve the goal
	Fair Housing Coals
	Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal
	Fair Hausing Cook
	Fair Housing Goal: Describe fair housing strategies and actions to achieve the goal
	Describe fair nousing strategies and actions to defice the god

GOAL #1: Redevelop aged & deteriorated family properties.

1.1 Complete Choice Neighborhood redevelopment of Spencer Homes.

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.

Relocation of all residents was completed in 2022. OHA received HUD approval for demolition of all units. However, demolition costs increased very significantly since the project was budgeted. All Spencer units west of the North Freeway (Highway 75) have been demolished. Spencer units east of the North Freeway (33 units) still remain to be demolished. OHA staff is working with the City to demolish the remaining buildings.

Redevelopment is scheduled in phases and is proceeding according to plans. Highlander IV, which includes 37 Spencer replacement housing units, recently began leasing. Former Spencer residents have been notified of their right to lease the replacement units, and, at present, 16 former Spencer tenants are scheduled to move in Fall 2023. Kennedy Square East construction is progressing on schedule. Kennedy Square West closing is planned for 2024. Kennedy Square West will consist of 39 units plus commercial space in a four-story building. The project will be financed with a mix of 9% LIHTC, CDBG-DR funds, CCI funds and deferred developer fees, and OHA will provide 15 project-based vouchers.

Per LIHTC requirements and CNI plans, new developments will be owned by one or more LLCs or other entities. OHA may retain ownership of the underlying lands or dispose of lands through sale or long-term ground lease to the owner entities. OHA may submit application(s) to HUD for approval for disposition in accord with the CNI revitalization plans. 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. OHA has committed to provide PBV vouchers to this project.

1.2 Complete Choice Neighborhood redevelopment planning for Southside Terrace.

This objective has been completed.

In 2019, OHA and partners including the City of Omaha were awarded a \$1.3 million Choice Neighborhoods Planning (CNP) grant to plan revitalization of the Southside Terrace and Indian Hills neighborhood. CNP redevelopment planning is complete. During 2022, OHA and partners submitted an application for HUD Choice Neighborhoods Implementation (CNI) grant. In September 2022, HUD awarded OHA and its partners a \$50 million HUD CNI grant for this revitalization project.

1.3 Begin redevelopment of 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, HUD awarded OHA and its partners a \$50 million HUD Choice Neighborhoods Implementation (CNI) grant for this revitalization project.

Southside Terrace is a large development, and redevelopment will be conducted in phases. Redevelopment will require relocation of all existing residents, in phases, and will require demolition, in phases, of all existing units and buildings on the Southside Terrace property. During 2023, OHA received HUD approval for demolition of all Southside Terrace units. New construction also will be conducted in phases. During 2023-2024, OHA plans a first phase in the southeast corner of the Southside Terrace property, which includes 2 existing buildings (16 units) with 13 tenants. Relocation activities have begun, and OHA anticipates relocation of residents during 2023, with demolition activities to begin in early 2024. This phase will consist of new construction of a 92-unit multi-family building and has received a 4% LIHTC award from NIFA. Financial closing is expected to occur in the first quarter of 2024. A next phase includes off-site development on OHA's Arbor Villa site (18 units). Relocation activities are beginning, and OHA anticipates relocation of residents by Summer 2024, with demolition activities to begin in Fall 2024. New construction on the Arbor Villa site will include 70 mixed income units, including replacement housing units. A next phase of redevelopment on the Southside Terrace property is in process in accord with the CNI redevelopment plans.

Per LIHTC requirements and CNI plans, developments will be owned by one or more LLCs or other entities. OHA may retain ownership of the underlying lands or dispose of lands through sale or long-term ground lease to the owner entities. During 2023-24, OHA intends to submit application(s) to HUD for approval for disposition in accord with the CNI revitalization plans. 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 and opportunities to support this neighborhood revitalization. OHA has committed to provide PBV vouchers to this project.

GOAL #2: Reposition properties that are disproportionately costly.

2.1 Develop & implement repositioning plan for Securities Building.

This objective has been completed.

OHA's housing stock includes HIO-owned LIHTC properties that have proven disproportionately costly to maintain. OHA's first priority was disposition of the Securities Building. In August 2021, OHA submitted a Section 18 application for market disposition of the property. This application was approved by HUD. During 2022, all tenants were relocated. The Securities Building was sold in August 2022. The property will remain affordable housing under the LURA which requires continued operation as affordable housing for a fixed time period.

2.2 Develop & implement repositioning plans for other HIO LIHTC properties.

OHA's housing stock includes LIHTC properties that have proven disproportionately costly to maintain. 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. Some properties consistently operate with significant deficits totaling hundreds of thousands of dollars each year, in particular, historic properties (Securities Building, Chambers Court, Farnam Building, and Bayview). OHA is evaluating repositioning options for all of its HIO LIHTC properties, including Section 18 disposition, mixed-finance redevelopment, RAD conversion, PBV conversion or other commitment of project-based voucher funding, and any other available resources and opportunities.

Chambers Court (NE001000021): Chambers Court is OHA's next top priority because the property operates with deficits of hundreds of thousands of dollars per year. This is a historic property, built in about 1905-1910. It has 70 total units including 32 public housing units. OHA acquired this property as part of OHA's resolution of the *Hawkins* lawsuit. The property was renovated with LIHTC funds in 2005 and is subject to LURA restrictions through 2045 and state restrictions on resyndication of tax credit funding until 2026. Throughout 2021-2022, OHA together with its co-developer, Brinshore Development, reviewed repositioning options that would allow OHA to retain Chambers Court in its affordable housing stock, including RAD conversion with renovations needed to address capital needs to reduce maintenance and operating costs. However, OHA and Brinshore ultimately determined that RAD conversion was not feasible, namely because the property would not be eligible for LIHTC funds necessary for renovations until 2026

OHA intends to pursue disposition of this property. At present, OHA is communicating with a potential buyer who would use the property for services and housing of refugee families. The Chambers Court property would continue to be subject to the LURA, which requires the property to be committed to providing affordable housing for low-income households through 2045. OHA staff has been communicating with HUD regarding possible disposition. One option is that OHA would replace 24 of the 32 existing public housing units by placing PBV voucher assistance in 10 non-ACC units at the Farnam Building and 14 North Villa units. This option would require use of up to 24 vouchers from OHA's HCV voucher stock. However, OHA staff notes that this disposition would not result in a net loss of affordable housing units in our community, as the Chambers Court units are committed by LURA to remain affordable units through 2045. In addition, OHA staff believes that disposition is necessary to end the ongoing large financial losses that have continued over years, that limit resources available to OHA's housing portfolio city-wide, and that jeopardize OHA's financial viability. An alternate disposition option might involve transfer of assistance. At present, OHA staff continues to seek guidance from its consultants and HUD to determine which option would best serve OHA's mission agency-wide and community-wide. During 2023-2024, OHA intends to submit a Section 18 disposition application to HUD.

Farnam Building (NE001000028): OHA staff is exploring repositioning options including RAD conversion of the Farnam Building without the use of LIHTC funding or partnering with an outside developer. Staff has assessed the physical needs and submitted a grant application for additional capital funds to assist with renovations. Ultimately, OHA expects to convert the building through RAD after the renovations have been completed. Depending on the outcome of Chambers Court plans, OHA may commit PBV vouchers to the 10 non-ACC units in the Farnam Building.

Bayview (NE001000027): OHA plans RAD conversion of Bayview in 2024.

NOAH (NE001000023): NOAH includes 24 single-family homes built by OHA in about 2005 in response to the *Hawkins* lawsuit. These are units that OHA wishes to retain in its affordable housing stock. During 2023-2024, OHA intends to submit a Section 18 application to HUD for conversion of NOAH units to PBV. (See OHA's plans for scattered site units in Section 2.3 below.) Five NOAH units do not meet HUD's definition of "scattered site" units. OHA may retain these 5 units as public housing units or alternately OHA may pursue RAD conversion of these 5 units.

Crown I & Crown II (NE001000025 & NE001000026): Crown I and Crown II include 28 single-family homes built by OHA in about 2008 in response to the *Hawkins* lawsuit. These are units that OHA wishes to retain in its affordable housing stock. OHA intends to submit a Section 18 application to HUD for PBV conversion. (See OHA's plans for scattered site units in Section 2.3 below.) Five units do not meet HUD's definition of "scattered site" units. OHA may retain these units as public housing units, or alternately OHA may pursue RAD conversion of these 5 units. OHA notes that Crown I and II units may be subject to NIFA requirements that may restrict disposition required by PBV or RAD conversions.

Keystone Crown (NE001000029): This is a 37-unit development that includes multifamily buildings as well as some single-family homes located in west Omaha. In addition, OHA's scattered site stock includes 3 single-family homes adjacent to the Keystone Crown units. These units were newly-built in early 2000s and are sited in a desirable West Omaha location. OHA wishes to retain the Keystone Crown and adjacent units in its affordable housing stock. OHA intends RAD conversion of Keystone Crown and the 3 adjacent units. OHA notes that the Keystone Crown units may be subject to NIFA requirements that may restrict disposition required by PBV or RAD conversions.

2.3 Evaluate scattered site portfolio & implement disposition plan.

OHA's housing stock includes a large number of scattered site public housing units, including more than 600 units in 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 scattered site portfolio to determine appropriate repositioning options. This review includes single-family homes in the NOAH, Crown I, and Crown II developments (see 2.2 above). OHA will pursue any repositioning options available, including Section 18 disposition, RAD conversion, project-based voucher conversion, mixed finance redevelopment, privately-financed redevelopment, or other repositioning options.

A first step is identifying properties appropriate for removal from OHA's inventory because of disproportionate costs, capital needs, or related reasons. During 2023, OHA began capital needs assessments of its scattered site properties to guide us in these decisions. 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 scattered site units identified for removal from OHA's inventory, OHA will pursue HUD Section 18 approval for disposition including market sale. OHA will consider negotiated agreements for disposition to nonprofit affordable housing providers at appraised value. For scattered site properties to be retained in OHA's inventory, OHA will pursue Section 18 applications for disposition to OHA's affiliate entity, River City Housing, and conversion to PBV assistance. Units that do not meet HUD definition of "scattered site" units may be retained as public housing units or alternately OHA may pursue RAD conversion.

During 2023-2024, OHA intends to submit Section 18 disposition applications for sale of units. OHA also intends to submit Section 18 applications for disposition to OHA's controlled affiliate, River City Housing, and PBV conversion of units. OHA also intends to submit applications for RAD conversion of units that OHA wishes to retain in its housing stock but that are not eligible for PBV conversion. This includes single-family homes and small properties that do not meet HUD's definition of "scattered site" units eligible for PBV conversion. OHA's portfolio includes a number of small multifamily properties. During 2023, OHA submitted application to HUD for RAD conversion of its Frances Court development, a small multifamily property with 14 units. See Attachment B.2.rad for a current list of properties proposed for RAD conversion beginning 2024.

2.4 Develop & implement long-term plan for HIO56 properties.

In 2021, at the time OHA prepared these Five-Year goals and objectives, OHA and HIO's housing stock included 56 rental units developed under HUD's Section 8 New Construction program, a program that HUD discontinued in 1983. In 2020, OHA exited the HUD contract. Current tenants of these units were offered the opportunity to remain in their current unit or, alternately, to move to another rental unit in the private market, with Enhanced Tenant Protection Vouchers. The 56 units no longer receive any subsidy except for units that remain occupied by current tenants with Enhanced Tenant Protection Vouchers. OHA and HIO will plan repositioning of these HIO56 properties.

Park Villa (24 units): OHA pursued acquisition and renovations of this property with RHF funds. It is scheduled to be converted to ACC public housing units beginning January 1, 2024. See 3.1 below regarding Park Villa redevelopment. OHA is considering future RAD conversion.

Arbor Villa (18 units): Since OHA exited the former HUD HAP contract, this property receives no HUD project-based subsidies. It is occupied by tenants paying the market rent including tenants with HCV vouchers. The Arbor Villa site is planned for off-site redevelopment as part of the Southside Terrace CNI revitalization (see 1.3 above). Relocation activities have begun, and OHA plans that current residents will be relocated by Summer 2024, with demolition activities to begin in Fall 2024.

North Villas (14 units): The North Villas include 3 small properties (Binney, Emmet, & Pinkney Villas) with 14 total units. Since OHA exited the former HUD HAP contract, these units have received no project-based subsidies. They are occupied by tenants paying the market rent including tenants with HCV vouchers. OHA wishes to retain these units in its affordable housing stock. OHA is considering commitment of PBVs to these 14 units as part of OHA's proposed disposition of Chambers Court (see 2.2 above). Alternately, OHA may pursue any repositioning options available, including market disposition; disposition to OHA's new controlled affiliated agency, River City Housing; redevelopment; conversion to public housing units; RAD conversion; conversion to project-based vouchers; mixed finance redevelopment; privately-financed redevelopment. OHA will review these properties along with its review of other "scattered site" properties (see 2.3 above).

GOAL #3: Maintain & increase the number of low-income families served.

3.1 Complete RHF development.

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. The project involved significant exterior and interior renovations.

Renovations are scheduled to be complete about 09/30/2023. OHA expects that 95% of units will be leased by 12/31/2023, and the project will be converted to ACC public housing units and eligible for public housing funding beginning 2024.

3.2 Apply for replacement housing vouchers for redevelopment and disposition projects.

Repositioning and disposition activities may result in a reduction of public housing units. For many repositioning activities, HUD permits PHAs to apply for replacement tenant protection vouchers. The replacement housing vouchers may be used by current tenants for relocation, and replacement housing vouchers not used by tenants for relocation are added to OHA's Housing Choice Voucher stock. The purpose is to minimize the loss of affordable housing subsidies, as much as possible.

In its repositioning and disposition activities, OHA has applied for and been awarded the maximum number of replacement housing vouchers to maximize its resources for providing affordable housing.

3.3 Apply for grants of additional Mainstream & other vouchers.

OHA was awarded 142 Emergency Housing Vouchers. OHA has screened numerous families for eligibility and has successfully housed approximately 105 families. OHA will continue leasing families through the award period.

At the time that OHA established these five-year goals & objectives for 2021-2025, OHA did not anticipate COVID requirements, Emergency Housing Vouchers, and OHA's award of a second CNI grant for Southside Terrace (see 1.3 above). In addition, OHA's current plans include more aggressive pursuit of repositioning options, including PBV & RAD conversions. OHA's CNI redevelopment and future repositioning activities—and related relocation activities—will require significant staff time and resources. OHA's staff time and resources are best committed to these immediate activities.

3.4 Plan development of new LIPH units.

At the time that OHA established these five-year goals & objectives for 2021-2025, OHA did not anticipate its future award of a second CNI grant for Southside Terrace (see 1.3 above), nor did OHA anticipate its more active pursuit of repositioning options, including PBV conversions. OHA's CNI redevelopment and future repositioning activities including PBV and RAD conversions are now OHA's top priorities. They will require significant staff time and resources. At present, given the CNI redevelopment opportunities and immediate repositioning opportunities, including PBV and RAD conversions, OHA believes that our staff time and resources are best committed to these immediate activities.

GOAL #4: Improve physical condition & quality of life in OHA properties.

4.1 Maintain PHAS PASS/REAC overall score of 24 points (60%).

During 2021, there were no REAC inspections due to COVID.

REAC inspections resumed in 2022, however HUD did not release an official PHAS score. OHA's score if it was published would have been 27.1.

No REAC inspections have been completed for 2023 at this time.

4.2 Achieve REAC scores of 60% for each property & strive for 80+%.

During 2021, there were no REAC inspections due to COVID.

REAC inspections resumed in 2022. The table below shows 2022 REAC scores as well as scores from the previous inspections. As the table shows, in 2022, 16 developments had REAC scores of 60% or higher. Five of those properties had scores of 80% or higher. Six properties had REAC scores below 60% (Jackson, Farnam, Southside, Chambers, SCNW, and Crown 1).

No REAC inspections have been completed for 2023 at this time.

Property	2023 REAC Scores	2022 REAC Score	Previous REAC Score
Evans		72	57
Florence		83	65
Underwood		82	51
Benson		85	72
Crown		88	92
Securities		54	39
Farnam		56	54
Jackson		58	54
Park South		78	73
Pine		86	62
KayJay		72	29
Highland		72	80
Southside		53	36
Spencer		NA	80
SCSE		68	59
SCNW		70	45
SCSW		43	69
Keystone		62	51
Par kVilla		NA	NA
SCNE		64	65
Chambers		26	61
NOAH		64	45
Crown1		40	45
Crown2		63	74
Bayview		69	68

4.3 Continue to implement security improvements.

During 2021, OHA began reorganization of its public safety staffing, contracts, & responsibilities. In 2022, OHA hired a new Public Safety Manager, Shon Comisky, who began employment in July 2022. Mr. Comisky is actively moving reorganization and agency-wide actions to improve security in OHA properties.

OHA continues to undertake capital improvements to increase security in OHA properties. Surveillance and access controls are continually updated. The current installment of cameras and upgraded access controls on the main doors is complete at all high-rise towers. Additionally, increased access controls on common access doors such as the laundry rooms and community rooms are in-work at five towers (Jackson, Kay Jay, Crown, Benson, and Underwood). OHA is planning to install the added access controls at Highland, Park North, and Park South Towers.

GOAL #5: Improve public housing management & operations to maintain standard performance & work toward high performance status.

5.1 Maintain PHAS FASS overall score of 15 points (60%).

HUD did not provide FASS scores in 2020 or 2021.

HUD will provide FASS scores for 2022, however they are not yet available.

5.2 Achieve PHAS FASS score of 15 points (60%) for each property.

HUD did not provide FASS scores in 2020 or 2021.

HUD will provide FASS scores for 2022, however they are not yet available.

5.3 Maintain PHAS MASS overall score of 15 points (60%).

OHA did not receive a PHAS score in 2021. This measure was tracked internally. As of July 2021, OHA projected an overall MASS score of 15.48.

During 2022, an official PHAS score was not released by HUD. This measure was tracked internally. OHA projected an overall MASS score of 17.7 for 2022.

As of August 2023, OHA's MASS score was projected to be 16.5.

5.4 Achieve PHAS MASS score of 15 points (60%) for each property.

As of July 2021, of the 19 AMPs which received a MASS score, 13 achieved a score of 15 or more.

In 2022, 11 of 16 of the AMPs that received a MASS score achieved a score of 15 or more. OHA's overall MASS score remained above 15 points.

AMP#	DEVELOPMENT NAME	2021	2022	2023	2024	2025
NE001 000001	SOUTHSIDE TERRACE	13	22			
NE001 000002	SPENCER HOMES	18	NA ALL T	ENANTS REL	OCATED	
NE001 000005	KAY JAY TOWER	21	21			
NE001 000006	EVANS TOWER	17	16			
NE001 000007	PARK NORTH	21	NA AMP	MERGED WI	TH NE001	800000
NE001 000008	PARK SOUTH	21	23			
NE001 000009	BENSON TOWER	13	9			
NE001 000010	PINE TOWER	17	17			
NE001 000011	FLORENCE TOWER	17	13			
NE001 000012	HIGHLAND TOWER	21	22			
NE001 000013	JACKSON TOWER	9	9			
NE001 000014	UNDERWOOD TOWER	21	21			
NE001 000015	CROWN TOWER	17	12			
NE001 000016	SCATTERED SITES NE	10	16			
NE001 000017	SCATTERED SITES SE	12	25			
NE001 000018	SCATTERED SITES NW	20	25			
NE001 000019	SCATTERED SITES SW	12	25			
NE001 000029	KEYSTONE CROWN CREEK RHF	16	NA AM	P MERGED V	VITH NE00	1 000016
NE001 000030	SCATTERED SITES MONROE	25	NA AM	P MERGED V	VITH NE00	1 000016
	AGENCY-WIDE AVERAGE	15.48	17.7			

5.5 Achieve & maintain occupancy rate of 96% & strive for 98%.

As of July 2021, the YTD occupancy rate (unit months leased/unit months available) is 91%. OHA's occupancy rates have increased steadily each month through 2021. The July 2021 occupancy rate is 95.9%.

OHA's occupancy rate in 2022 was 96.6%. Six AMPs had an overall occupancy rate of 98% or more (Park South, Bayview, Crown II, SCNW, Keystone and SCSW). Eight AMPS had occupancy rates below 96%.

As of August 2023, the occupancy rate (unit months leased/unit months available) was 96.9% and 13 of 23 public housing developments had an occupancy rate of 98% or higher. Seven developments had occupancy rates below 96%.

5.6 Achieve & maintain TAR rate of below 1.5%.

As of July 2021, OHA had a TAR ratio of 1.27.

As of June 30, 2022, OHA had a TAR ratio of 0.61. In 2022, a COVID waiver was in place that increased the thresholds for TARs which resulted in five AMPS that would have received all available points and one which would have received partial points for TARs.

As of August 31, 2023, OHA had a TAR ratio of 0.49. Eight OHA public housing developments had TAR of 1.5% or below.

5.7 Achieve & maintain PHAS MASS Accounts Payable score below 0.75.

OHA's MASS Accounts Payable score is below 0.75 for all properties.

5.8 Obligate 90% or more of CFP funds by the required date & timely expend CFP funds.

All annual allocation CFP funds have been timely obligated & timely expended. Funds were recaptured from a 2021 Safety and Security Grant in the amount of \$139,617.87. This recapture does not impact PHAS scoring and will not impact future grant allocations.

GOAL #6: Effectively manage HCV & other voucher assistance programs.

6.1 Maintain high-performing SEMAP rating.

OHA's HCV program has maintained its high-performing SEMAP rating.

6.2 Maintain HCV lease-up rate & strive for increased lease-up rate.

OHA has maintained a lease-up rate of 91%.

6.3 Effectively manage OHA's Mainstream, VASH, HOME, and PBV programs.

OHA continues to effectively manage these programs and work toward improvement in coordination with funding partners and administration of their programs.

GOAL #7: Other agency-wide service objectives

7.1 Ensure compliance with fair housing & equal opportunity requirements.

OHA continues its commitment to fair housing, nondiscrimination, and equal opportunity. During 2022 and 2023, OHA staff in both the public housing program and HCV program participated in HUD's online fair housing training. OHA will continue ongoing staff training regarding fair housing requirements, including accommodations of disability and VAWA. In addition, in 2023, OHA contracted with a third-party company (Lighthouse) to provide a resource for employees to voice anonymously any complaints or issues.

7.2 Continue to develop electronic program access for participants.

It had long been a goal for OHA to make program activities and documents accessible electronically so that program participants could handle their business with OHA electronically, rather than OHA requiring in-person appointments & submission of paper documents. The COVID pandemic restrictions made this a top priority. Improvements include:

- All applicant/resident forms have been converted to DocuSign.
- Resident Portal where residents can pay rent online, submit maintenance requests, get their rent ledger, check inspection status.
- Most forms for applicants/tenants/program participants have been converted to forms available & usable on our online portal.
- Applicant Portal applicants can apply for PH/HVC and check their status online.
- Landlord portal landlords can submit info online, check HAP payment status, get needed documents, check inspection status.
- Residents/participants will be able to do interims/annuals online, submit docs online.

OHA's applicants/tenants/program participants are now able to handle most business with OHA electronically, however OHA provides in-person appointments & submission of paper documents as needed to accommodate family's needs.

7.3 Provide top-notch customer service to participants & public.

At the time OHA established these 5-year goals and objectives, OHA had not anticipated the need for quick and extensive expansion of electronic/online access to services, required by COVID. COVID made it a priority, and, thereafter, this has become OHA's primary priority for customer service. From 2020 forward, OHA's customer service improvements have focused on electronic/online access to services, as described in 7.2 above. During the remaining years of OHA's 5-Year Plan for 2021-2025, OHA expects that its goals and objectives for improving customer service will be dedicated to continued expansion and improvements of its online resources. OHA will continue to make improvements to provide strong and effective customer service to our program participants and the public. Meanwhile, continued expansion of OHA's online resources is a very beneficial customer service improvement for OHA's tenants, program participants, and applicants.

7.4 Promote self-sufficiency of assisted households.

OHA is dedicated to fostering a vibrant and mutually beneficial relationship between our residents and our staff, with the ultimate aim of enhancing the well-being and economic prosperity of all residents, spanning from the youngest to the elderly and all those in between. OHA collaborates with residents, community groups, business partners, resettlement organizations, and other key stakeholders, and our primary objective is to ensure the delivery of high-quality services and programs to the diverse populations we serve. At the heart of our resident services are our dedicated Service Coordinators. These professionals provide essential support, including case management and coaching, as well as facilitate access to community-based providers offering a wide array of social services and enriching activities. OHA's continuous efforts are concentrated on expanding and strengthening programs for both public housing and voucher families. This includes a significant focus on broadening enrichment initiatives, sports, educational opportunities, and college placement services for youth and families. Additionally, we prioritize soft skills training, job readiness preparation, and facilitating job placement and career development.

Our overarching mission is to empower individuals and families to attain economic stability and personal well-being. Resident Service Programs are designed to foster community engagement, promote economic growth, ensure financial stability, and create opportunities for self-sufficiency among all residents. Moreover, Resident Service Coordinators at our senior properties play a pivotal role in assisting residents to achieve self-sufficiency while successfully aging in place. Programs encompass various facets of quality of life and wellness, including resident engagement and community participation, health and wellness, housing stability, and financial stability. Health and Wellness initiatives include health screenings, physical fitness classes, and opportunities for socialization, while housing stability services encompass vital support for housing inspections and lease education.

Resident Service Coordinators fulfill a range of core functions:

- Comprehensive Assessments: Resident Service Coordinators conduct comprehensive, non-clinical assessments of residents for wellness and social needs. This ensures that our services are tailored to meet individual requirements.
- Service Access and Coordination: Resident Service Coordinators help residents identify, access, and coordinate services, including
 closely monitoring services provided and maintaining consistent communication with service providers. This ensures that residents
 receive the necessary support and follow through with services.
- Monitoring and Follow-Through: Resident Service Coordinators continuously monitor the receipt and follow-through of services.
 They play a crucial role in encouraging and motivating residents to engage with providers and actively participate in their own care and services management.

- Educational and Preventative Health Programs: We proactively develop and arrange educational and preventative health programs and services for residents. This includes initiatives aimed at improving their overall well-being and quality of life.
- Community Partnerships: Resident Service Coordinators are dedicated to developing and sustaining partnerships with community-based supportive service providers and other community stakeholders. These partnerships enhance our ability to meet the diverse needs of our residents.
- Resource Directory: We maintain an up-to-date resource directory of local service providers. This ensures that residents have easy access to information about available services and resources.

OHA's dedicated staff remains steadfast in its commitment to forging and expanding critical community partnerships and resources that align with the agency's self-sufficiency and service objectives. Simultaneously, we are tirelessly working towards developing additional resources to support resident services through the Omaha Housing Authority Foundation.

ATTACHMENT B.2.rad PROPOSED RAD CONVERSIONS: SCATTERED SITES & SMALL DEVELOPMENTS

HUD's Rental Assistance Demonstration (RAD) program was designed to assist public housing agencies in addressing the capital needs and financial viability of public housing properties in order to preserve these affordable housing assets. RAD conversion makes it possible for a property to borrow funds to address capital needs. RAD conversion also stabilizes the amount of revenue per unit. Upon RAD conversion, units will be removed from the public housing program and converted to Section 8 funding according to a RAD-specified formula. If OHA's applications for RAD conversion are approved by HUD, the public housing units will be converted to RAD Project Based Vouchers under the guidelines of HUD notice PIH 2019-23, Rev-4, and any successor notices. OHA's Capital Fund budget will be reduced by the pro rata share of public housing units converted as part of the RAD program.

HUD's RAD program requires specific resident rights and protections. Upon RAD conversion, OHA will adopt the resident rights, participation, waiting list and grievance procedures as required by HUD in notices PIH 2019-23, namely Section 1.6.C-D, PIH-2016-17, and any successor notices. These resident rights and protections requirements are appended to this Attachment B.2.rad and incorporated herein.

The following pages provide information related to the OHA public housing units and developments that OHA proposes for RAD conversion at present. These include:

- SCSE Frances Court (15 units) (3706-3736 Frances Street)
- NOAH (5 units that don't qualify as "scattered sites") (2026-2042 N. 18th Street)
- Keystone Crown (37 units)
- SCNW 8715, 8765, & 8771 Sahler Street (3 units on the Keystone site, formerly AMP SCKC)
- Crown I & II (28 units)
- SCNE Alamo 118 N 36th ST (14 units)
- Bayview 1234 S. 13th Street (12 units)
- SCNW 3042 Menke Cir (6 units)
- SCSW 11805 Cryer Ave (6 units)
- SCNE 3338 Meredith (6 units)
- SCNE 5817 N 24th (6 units)
- SCNW Cherry Tree 8304 Underwood (30 units)

In addition, OHA proposes RAD conversion of any other single-family homes, duplexes, and 3-4-unit properties that OHA wishes to retain in its affordable housing portfolio but that are not eligible for PBV conversion through Section 18 because they do not meet HUD's definition of "scattered site" units.

OHA's Five-Year CFP Plan includes approximately \$1,000,000 for RAD conversions. OHA is in the process of revising its Five-Year CFP Plan in accord with these proposed RAD conversions.

OHA certifies that it is currently compliant with all fair housing and civil rights requirements. In accord with HUD's RAD review process, OHA's proposed RAD conversion plans will be submitted to HUD FHEO for review. OHA's RAD conversions will comply with all applicable site selection and neighborhood reviews as required by HUD, and all appropriate requirements and procedures will be followed.

FRANCES COURT

Public Housing Project: Frances Court

PIC Development ID: NE001000017 (Scattered Sites South East)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 15

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$210.07 per ACC unit per month est; \$35,292 total per year est

Bedroom Type:				Number of Units Post-Conversion	Change in Number of Units
		Pre-Conversion ACC Other Total		Post-Conversion	per Bedroom Type
FCC	ACC	Other	TOLAI		
Efficiency					
One bedroom					
Two Bedroom	8		8	8	No changes in
Three Bedroom	6		6	6	number of units
Four Bedroom					
Nondwelling unit		1	1	1	
Total	14	1	15	15	

NOAH (5 units 2026-2042 N. 18th Street)

Public Housing Project: NOAH (5 units 2026-2042 N. 18th Street)

PIC Development ID:

Conversion Type:

Transfer of Assistance
Total Units

NE001000023

RAD PBV

n/a

5

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$197.93 per ACC unit per month est; \$11,876 total per year est

Bedroom Type:	Number of Units		its	Number of Units	Change in Number of Units	
	Pre-Conversion		n	Post-Conversion	per Bedroom Type	
	ACC	Other	Total			
Efficiency						
One bedroom						
Two Bedroom					No changes in	
Three Bedroom	2		2	2	number of units	
Four Bedroom	3		3	3		
Total	5		5	5		

KEYSTONE CROWN

Public Housing Project: Keystone Crown
PIC Development ID: NE001000022
Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 37

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$193.22 per ACC unit per month est; \$85,790 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom	8		8	8	No changes in
Three Bedroom	23		23	23	number of units
Four Bedroom 6 6		6	6		
Total	37		37	37	

8715, 8765, & 8777 SAHLER STREET

Public Housing Project: 8715, 8765, & 8777 Sahler Street (3 units formerly AMP SCKC)

PIC Development ID: NE001000018 (Scattered Sites North West)

Conversion Type: RAD
Transfer of Assistance n/a
Total Units 3

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$202.51 per ACC unit per month est; \$7,290 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom					No changes in
Three Bedroom					number of units
Four Bedroom	3		3	3	
Total	3		3	3	

CROWN I

Public Housing Project:

PIC Development ID:

Conversion Type:

Transfer of Assistance

Total Units

Crown I

NE001000025

RAD PBV

n/a

16

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$193.97 per ACC unit per month est; \$37,242 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom					No changes in
Three Bedroom	16		16	16	number of units
Four Bedroom					
Total	16		16	16	

CROWN II

Total Units

Public Housing Project: Crown II
PIC Development ID: NE001000026
Conversion Type: RAD PBV
Transfer of Assistance n/a

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

12

Capital Fund allocation: \$193.97 per ACC unit per month est; \$27,932 total per year est

Bedroom Type:		Number of Units Pre-Conversion		Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom					No changes in
Three Bedroom	12		12	12	number of units
Four Bedroom					
Total	12		12	12	

ALAMO

Public Housing Project: Alamo (118 N. 36th Street)

PIC Development ID: NE001000016 (Scattered Sites North East)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 14

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$245.46 per ACC unit per month est; \$41,237 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom	6		6	6	
Two Bedroom	8		8	8	No changes in
Three Bedroom					number of units
Four Bedroom					
Total	14		14	14	

BAYVIEW

Public Housing Project:

PIC Development ID:

Conversion Type:

Transfer of Assistance

Total Units

Bayview

NE001000027

RAD PBV

n/a

12

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$186.26 per ACC unit per month est; \$26,821 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom					No changes in
Three Bedroom	12		12	12	number of units
Four Bedroom					
Total	12		12	12	

3042-3052 MENKE CIRCLE

Public Housing Project: 3042-3052 Menke Circle (6 units)

PIC Development ID: NE001000018 (Scattered Sites North West)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 6

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$202.51 per ACC unit per month est; \$14,581 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom	6		6	6	No changes in
Three Bedroom					number of units
Four Bedroom					
Total	6		6	6	

11805-11819 CRYER AVE

Public Housing Project: 11805-11819 Cryer Ave

PIC Development ID: NE001000019 (Scattered Sites South West)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 6

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$229.14 per ACC unit per month est; \$16,498 total per year est

Bedroom Type:	Number of Units Pre-Conversion			Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom	2		2	2	No changes in
Three Bedroom	3		3	3	number of units
Four Bedroom	1		1	1	
Total	6		6	6	

3338-3348 MEREDITH AVE

Public Housing Project: 3338-3348 Meredith Ave

PIC Development ID: NE001000016 (Scattered Sites North East)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 6

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$245.46 per ACC unit per month est; \$17,673 total per year est

Bedroom Type:		er of Uni nversion		Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom	6		6	6	No changes in
Three Bedroom					number of units
Four Bedroom					
Total	6		6	6	

5817-5827 N. 24TH STREET

Public Housing Project: 5817-5827 N. 24th Street

PIC Development ID: NE001000016 (Scattered Sites North East)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 6

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$245.46 per ACC unit per month est; \$17,673 total per year est

Bedroom Type:		er of Un nversio		Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom					
Two Bedroom	6		6	6	No changes in
Three Bedroom					number of units
Four Bedroom					
Total	6		6	6	

CHERRY TREE

Public Housing Project: Cherry Tree

PIC Development ID: NE001000018 (Scattered Sites North West)

Conversion Type: RAD PBV
Transfer of Assistance n/a
Total Units 30

Pre-RAD Unit Type: Family/General Occupancy
Post-RAD Unit Type: Family/General Occupancy

Capital Fund allocation: \$202.51 per ACC unit per month est; \$72,904 total per year est.

Bedroom Type:		er of Uni		Number of Units Post-Conversion	Change in Number of Units per Bedroom Type
	ACC	Other	Total		
Efficiency					
One bedroom	14		14	14	
Two Bedroom	16		16	16	No changes in
Three Bedroom					number of units
Four Bedroom					
Total	30		30	30	