

Streamlined Annual PHA Plan <i>(HCV Only PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 02/29/2016
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A.	PHA Information.
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PHA Name: City of Buffalo / Rental Assistance Corporation **PHA Code:** NY409
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2018
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Housing Choice Vouchers (HCVs) 5216
PHA Plan Submission Type: Annual Submission Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website.

The 5-Year Plan and Annual Plan are available for review at our office located at 470 Franklin Street, Buffalo, NY 14202; and on our website: www.racbny.org.

PHA Consortia: (Check box if submitting a joint 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
Lead HA:				

B.	Annual Plan.
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B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

Y N

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.
 Informal Review and Hearing Procedures.
 Homeownership Programs.
 Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
 Substantial Deviation.
 Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

SEE ATTACHMENT B 1

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

Project Based Vouchers.

(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

<p>B.3</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>B.4</p>	<p>Civil Rights Certification</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.5</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.6</p>	<p>Progress Report.</p> <p>SEE ATTACHMENT B 6</p>
<p>B.7</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/> No comments were provided.</p> <p>(a) 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>

ATTACHMENT B 1
Revision of PHA Plan Elements

Rent Determination

Many of RACB's clients have reported experiencing difficulty accessing suitable housing in areas of opportunities due to the higher rents charged in these areas. This forces many clients to accept marginal housing in areas of high poverty and few opportunities.

RACB is seeing an increase in rents in our market area. This increase in rents, coupled with a decrease in the most recent HUD established Fair Market Rents would make it even more difficult for our clients to find suitable housing.

To provide some assistance, effective January 1, 2018, RACB established a two tiered Payment Standard system. The Regular Payment Standards were set at approximately 107% of the HUD established FMR; while Exception Payment Standards were set at approximately 109% of the HUD established FMR.

These Exception Payment Standards will be used when a client selects a unit in a low poverty area. RACB has defined a low poverty area as a zip code in which the poverty rate is at or below 10%. These low poverty areas will be evaluated and updated on an annual basis.

ATTACHMENT B 6 Progress Report

RACB PHA 5-Year Plan Goals:

Goal: Maintain 98% lease up rate.

Progress: During calendar year 2017, we utilized 103.85% of our budget authority, which allowed for a unit utilization of 96.01%. Our 2017 budget authority was not determined by HUD until the end of June, which caused delays in increasing our utilization. During calendar year 2017 we utilized over half of our HUD-Held reserves.

Goal: Maintain a High Performance SEMAP score.

Progress: Our most recent SEMAP score for our fiscal year ending 06/30/17 rated RACB as a High Performer.

Goal: Increase our baseline authorization whenever possible.

Progress: During the past year, there have been no opportunities to apply for additional vouchers; however we will apply for all new funding that becomes available in the future.

Goal: Increase participation in the Family Self-Sufficiency (FSS) and Home Ownership (HOP) programs.

Progress: During 2017, we enrolled 48 new clients in our FSS/HOP programs; and plan to enroll an additional 50 new clients during 2018.

Goal: Increase efficiency in delivery of services.

Progress: We have increased our efficiency by updating our program software which will allow for more electronic communication and updating with applicants, clients and landlords.

We increased our participation with the Erie County Health Department's Lead Poisoning Primary Prevention Program to assist owners in high risk areas to obtain help in correcting potential lead hazards from their rental properties. This will not only assist clients in obtaining safe housing for their families, it will also encourage landlord participation in the program.

We have begun rewriting our Administrative Plan to make it more comprehensive, clear and understandable.

During 2018, we plan on implementing a biennial HQS inspections policy and procedure. Biennial inspections will be conducted on units which pass their initial inspection with no fail items. This should relieve some burden on both clients as well as landlords. It will also offer an incentive for landlords to maintain their properties to HQS standards at all times.

We have undertaken a study of our facilities to determine ways to increase our public space, including the creation of a Resource Room for clients searching for housing, a more comfortable waiting area, a larger briefing room, and increased private space to meet with clients one on one.

We implemented the changes outlined in PIH Notice 2017-08 Violence Against Women Reauthorization Act of 2013. This included the establishment of an Emergency Transfer Plan, new notification, documenting, record keeping and reporting requirements.

Certifications of Compliance with PHA Plans and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 02/29/2016
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**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning 07/2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

City of Buffalo / Rental Assistance Corp. of Buffalo

NY409

PHA Name

PHA Number/HA Code

XX Annual PHA Plan for Fiscal Year 07/01/18 – 06/30/19

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20_____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official

Title

John McMahon

Executive Director, RACB

Signature

Date

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, _____, the _____
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Rental Assistance Corp. of Buffalo
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Buffalo, New York
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

In consideration of RACB's Annual Plan, we find it to be consistent with the City of Buffalo's 5 year Consolidated Plan as no revisions have been made to the plan from last year's submission. They are consistent, specifically as it relates to supportive housing to low-income, elderly and disabled households, lead prevention/containment, and support of households working toward self-sufficiency and Fair Housing efforts.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Signature	Date

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

City of Buffalo / Rental Assistance Corp. of Buffalo
PHA Name

NY409
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official John McMahan

Title Executive Director, RACB

Signature

Date