

5-Year PHA Plan (for All PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016 NOTE: This form has an expiration date that has passed, but this is the latest version.
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, 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. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.																																
A.1	<p>PHA Name: <u>Miami-Dade County by and through Public Housing and Community Development (PHCD)</u> PHA Code: <u>FL005</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2019</u> (2015-2020) PHA Plan Submission Type: <input type="checkbox"/> 5-Year Plan Submission <input checked="" type="checkbox"/> Revised 5-Year Plan Submission</p> <p>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 on 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 each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years.</p> <p>We, the employees of Miami-Dade County and its housing department, Public Housing and Community Development (PHCD), through our collective efforts to positively enhance and better serve this community with integrity, care, high ethical standards, and competence, are committed to provide to low, very low, extremely low and moderate-income residents of Miami-Dade County:</p> <ul style="list-style-type: none"> • Affordable housing opportunities. • Neighborhood revitalization and stabilization activities. • Partnerships with private and public entities to optimize resources through innovative programs. • Efficient, compliant and effective management of resources.
B.2	<p>Goals and Objectives. Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p><u>Refer to Attachment 1</u></p>
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p><u>Refer to Attachment 1</u></p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA’s goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>PHCD has amended the Section 8 Administrative Plan and the Public Housing Admission and Continued Occupancy Policy and lease with the required provisions pursuant to the final rule published on November 16, 2016, named Violence Against Women Reauthorization Act of 2013 (VAWA 2013): Implementation in HUD Housing Programs (Docket No. FR-5720-F-03). PHCD complies with the requirements for notification of occupancy rights under VAWA and has established an emergency transfer plan.</p> <p>As approved by a Board of County Commissioners’ Resolution No. R-595-12 signs were posted in the public restrooms of buildings owned or operated by Miami-Dade County. These signs provide contact information and assistance to domestic violence victims.</p>

<p>B.5</p>	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>A. The following actions will be considered a Significant Amendment or Modification to the Five-Year Plan and Annual Plan:</p> <ul style="list-style-type: none"> • A change which would significantly affect rent or admissions policies or organization of PHCD's waiting lists. • A significant addition of non-emergency work items not included in the Capital Fund Program Annual Statement(s). • An exception to this definition will be made for any new activities that are adopted to reflect changes in HUD regulatory requirements or as a result of a declared emergency (such changes will not be considered significant amendments or modifications by PHCD). • Any proposed demolition, disposition, homeownership, Capital Fund financing, development, or mixed-finance projects not identified in the plan. <p>B. The following will be considered a Substantial Deviation from the Five-Year Plan:</p> <ul style="list-style-type: none"> • A substantial change in the direction pertaining to its goals and objectives. • The undertaking of new programs that do not further the stated mission or goals as set forth in the current Five-Year Plan. • An exception to this definition will be made for program activities required or adopted to reflect changes in HUD regulations or as a result of a declared national or local emergency. In such cases, the administrative/programmatic changes will not be considered as a Substantial Deviation from the Five-Year Plan. <p>C. As part of the Rental Assistance Demonstration (RAD), PHCD is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items per Notice PIH 2012-32 (HA) H-2017-03, REV-3:</p> <ul style="list-style-type: none"> • The decision to convert to either Project Based Rental Assistance (PBRA) or Site Based Voucher Assistance (PBV) under RAD; • 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; • Changes to the construction and rehabilitation plan for each approved RAD conversion; and • Changes to the financing structure for each approved RAD conversion.
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>PHA PLAN FY 2019-2020: A 45-DAY PUBLIC COMMENT PERIOD TOOK PLACE FROM MARCH 22, 2019, THROUGH MAY 5, 2019</p>
<p>B.7</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>

Instructions for Preparation of Form HUD-50075-5Y

5-Year PHA Plan for All PHAs

A. PHA Information [24 CFR §903.23\(4\)\(e\)](#)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. ([24 CFR §903.6\(a\)\(1\)](#))

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. ([24 CFR §903.6\(b\)\(1\)](#)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. ([24 CFR §903.6\(b\)\(2\)](#))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. ([24 CFR §903.6\(a\)\(3\)](#))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

(a) Did the public or RAB provide comments?

(b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.17\(a\)](#), [24 CFR §903.19](#))

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

**ATTACHMENT 1
TO
5-YEAR PHA PLAN (HUD-50075-SY)
FOR**

*PHA Name: MIAMI-DADE COUNTY BY AND THROUGH
PUBLIC HOUSING AND COMMUNITY DEVELOPMENT*

PHA Code: FL005

EFFECTIVE FISCAL YEAR BEGINNING: 10/2019 (2015-2020)

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SECTION B – 5-YEAR PHA PLAN ELEMENTS APPLICABLE TO THE PUBLIC HOUSING PROGRAM

SECTIONS B.2- Goals and Objectives

I. Increase the availability of affordable housing that reflect HUD and local requirements

- A. Expand the supply of assisted housing
 - 1. Leverage private or other public funds and/or generate revenue to create additional housing opportunities
 - a) Apply for funding, grants and other similar funding opportunities that may become available to refurbish and/or create additional housing and related work.
 - b) Verify information of each household member through the Enterprise Income Verification (EIV) for debts owed to other housing authorities and for double subsidy.
 - c) Monitor the Deceased Tenants Report available in EIV.
 - d) Pursue revenue-generating opportunities for Public Housing, such as cell phone antenna towers on public housing properties, sharing of developer fee revenues from redevelopment activities or other revenue generating opportunities that may present themselves.
 - 2. Acquire or build units or developments
 - a) PHCD reserves the right to issue Request for Proposals (RFP's), Request for Qualifications (RFQ's), Request for Applications (RFA's) and other similar solicitation documents as needed to achieve stated plans and objectives.
 - b) PHCD reserves the right to submit demolition and/or disposition applications for any development site in our portfolio subject to the Board of County Commissioners and HUD's approval.
- B. Improve the quality of assisted housing
 - 1. Improve Public Housing Assessment System (PHAS) Score
 - a) Continue improving its Public Housing Assessment System (PHAS) score with emphasis on management (MASS) and physical inspections (PASS) sub-indicators.
 - b) Continue the applicability of EIV's Income Information and Verification Reports (i.e. Multiple Subsidy Report, Identity Verification Report, Immigration Report, and Income Validation Tool Report).
 - c) Increase customer satisfaction
 - (1) Provide improved communication with management and referral services to residents.
 - 2. Concentrate on efforts to improve specific management functions
 - a) Deliver quality maintenance services to public housing units.
 - b) Implement preventive maintenance efforts.
 - c) Review options to ensure economic viability of the Helen Sawyer Plaza Assisted Living Facility.
 - 3. Renovate or modernize public housing units.
 - a) Implement Capital Fund Program 5-Year Action Plan, in accordance with available funding.
 - b) May consider implementing a force account (in-house) laborers on either a permanent or temporary basis to perform construction work for capital fund projects.
 - c) Utilize contractors for projects presented in the 5-Year Action Plan.
 - d) Continue utilizing the Construction Services Contract, Miscellaneous Construction Contracts (MCC) 7360, (includes the Work Order Contract) as necessary, for miscellaneous work and vacant unit repairs.
 - e) Due to utility modernization, building master meters, which are currently paid by Public Housing, may be replaced by individualized meters where the utility costs may become the responsibility of the resident.
 - f) Incorporate Crime Prevention through Environmental Design (CPTED) practices during the design phases of new development projects in consultation with police departments.
 - g) May utilize funds from the Capital Funds Financing Program (CFFP) upon approval.
 - h) May apply for available hazard mitigation funds to replace or install generators and shutters in public housing developments.

- i) Create and develop a strategy for rehabilitation and redevelopment of public housing inventory over the next 10 years.
- j) PHCD may modernize, **renovate** and/or **redevelop** public housing developments through the use of the Rental Assistance Demonstration (RAD) program.

C. Increase assisted housing choices

1. Applicants and current families will be advised of housing opportunities.
2. May elect to dissolve the waiting lists periodically or as needed.
3. Reduce public housing vacancies
 - a) Once the elderly population on the waiting list is exhausted, Public Housing may select “near elderly” for admission into “elderly” designated public housing units.
 - b) Continue the implementation of a pilot program for persons experiencing homelessness by collaborating with the Miami-Dade Homeless Trust.
 - c) May consider adding preferences to its admission policy to better assist elderly, special needs families, and/or eligible applicants.

II. Improve community quality of life and economic vitality

- A. Continue implementing public housing security improvements within budget limits.
- B. Continue meetings with resident councils to provide training on various aspects of resident organization and empowerment.
- C. May apply for grants and other funding sources to provide additional services for public housing programs.
- D. May request extension of grant obligations and expenditure deadlines as it may deem necessary.

III. Promote partnerships with job training and placement organizations

- A. Increase the number of employed persons in assisted families.
 1. Monitor contractors and subcontractors for compliance with Section 3 training and employment goals.
 2. The Section 3 function will continue offering opportunities for employment and training programs.
 3. Seek new partnerships with both public and private entities to enhance social and economic services to residents.
 4. Increase resident participation requirements for social service providers operating at public housing sites.
 5. May continue to apply for the Resident Opportunities and Self-Sufficiency (ROSS) Grant to assist families in public housing.
 6. Identify supportive services to increase independence for the elderly or families with disabilities.
 7. Continue providing Earned Income Disallowance (EID) to qualified families.
 8. Continue incorporating specific Section 3 job requirements in public housing rehabilitation solicitations.

IV. Ensure Equal Opportunity in Housing for all Americans

- A. Continue implementing Section 504, Americans with Disability Act (ADA), the Fair Housing Act, and the Voluntary Compliance Agreement (VCA) that will result in 459 Uniform Federal Accessibility Standards (UFAS) units.

- B. Continue to implement the Limited English Proficiency (LEP) policy.
- C. Remain committed to affirmatively furthering fair housing to ensure equal opportunity regardless of race, national origin, ethnic origin, color, sex, religion, age, disability, familial status, marital status, ancestry, status as victim of domestic violence, dating violence or stalking, actual or perceived sexual orientation, gender identity, gender expression, pregnancy or source of income.

SECTION B.3- Progress Report

I. Increased the availability of affordable housing that reflect HUD and local requirements

- A. Expanded the supply of assisted housing
 - 1. Leveraged private or other public funds and/or generated revenue to create additional housing opportunities.
 - a) Increased collection of outstanding debt from prior participants due to the information entered in Debts Owed to PHAs.
 - b) Avoided double subsidy cases by identifying applicants receiving housing assistance during initial screening.
 - c) Increased the availability of units by terminating housing assistance to single households listed on the Deceased Tenants Report.
 - 2. Acquired, built, or rehabilitated units (see detailed list in the Annual Plan's Progress Report).
- B. Improved quality of assisted housing
 - 1. Public Housing Assessment System (PHAS) Score
 - a) Pursuant to HUD's approval of PHCD's request to waive 24 CFR Part 902, PHCD's rating as a Standard Performer (scored 78 points) under PHAS for fiscal year ended September 30, 2016, will be carried over for the fiscal year ended September 30, 2017. Note that the waiver was granted pursuant to the notice published in the federal register on October 6, 2017: Relief from HUD Requirements Available to PHAs To Assist With Recovery and Relief Efforts on Behalf of Families Affected by Hurricanes Harvey, Irma, Maria and Future Natural Disasters Where Major Disaster Declarations Might Be Issued in 2017 (Docket No. FR-6050-N-01).
 - b) Continued to routinely write-off bad debt balances and to identify fraud related accounts receivables.
 - 2. Increased customer satisfaction
 - a) Established a risk assessment of safety and security needs.
 - b) Provided cameras, technological improvements, armed security guards and additional police presence at Liberty Square to reduce or prevent crime in the area.
 - c) Implemented measures to reduce or prevent crime for public housing projects as detailed below:
 - (1) Restored Cameras to Good State of Repairs
 - Wynnwood Elderly
 - Edison Plaza
 - Palm Court
 - Palm Towers
 - (2) Restored Cameras to Good State of Repairs and Improved Police Presence
 - Haley Sofge
 - Robert King High
 - Martin Fine
 - Annie Coleman 14
 - Arthur Mays Village
 - (3) Provided armed security guards throughout Public Housing Sites.
 - 3. Increased assisted housing choices

In an effort to address the risk of homelessness, PHCD entered into a Memorandum of Understanding with the Miami-Dade County Homeless Trust for referrals of homeless persons transitioning out of a

shelter, transitional housing program, rapid re-housing program, or permanent supportive housing. The program was initially limited to 25 Public Housing units. Due to the success of the Homeless Pilot Program, a second Memorandum of Understanding was executed for an additional 20 Public Housing units.

4. Concentrated on efforts to improve specific management functions
 - a) On September 16, 2015, the Board of County Commissioners approved Resolution No. R-772-15, to implement the energy conservation measures at various public housing sites.
- C. Increased assisted housing choices
 1. Continued processing applications received during 2008 and 2014 open registration periods.
 2. Reduced public housing vacancies by streamlining the screening process and reducing unit turnaround time.
- D. Improved community quality of life and economic vitality
 1. Implemented a policy to address over-income families in the Public Housing Program.
 2. Adopted a smoke-free policy pursuant to HUD regulations 24 CFR Parts 965 and 966, and Miami-Dade Board of County Commissioners Resolution Nos. R-1003-15 and R-582-16.
 3. Increased the availability of affordable housing that reflect HUD and local requirements.
 - a) Expanded the supply of assisted housing by identifying dilapidated developments for renovation.
- E. Promoted partnerships with job training and placement organizations
 1. Promoted Section 3 employment and contracting opportunities by monitoring contractors by including specific Section 3 requirements in solicitations.
- F. Ensured Equal Opportunity in Housing for all Americans
 1. Entered into a contract for oral and written translations.
 2. Increased Uniform Federal Accessibility Standards (UFAS) units.
 3. An amendment issued by HUD extended the duration of the Voluntary Compliance Agreement (VCA) until January 21, 2019 and requires Public Housing to convert 459 units.
 4. Continued to implement the VCA requirement to make its offices and public housing units within the PHCD portfolio accessible, countywide.
 5. Continued to provide reasonable accommodations for housing programs and services to persons with disabilities.
 6. Collected data from the current waiting lists via post-application questionnaire to gauge clients' disability-related needs.

SECTION B – 5-YEAR PHA PLAN ELEMENTS APPLICABLE TO THE HOUSING CHOICE VOUCHER

SECTIONS B.2- Goals and Objectives

I. Increase the availability of affordable housing that reflect HUD and local requirements

- A. Expand the supply of assisted housing
 - 1. Leverage private or other public funds and/or generate revenue to create additional housing opportunities.
 - a) Apply for funding, grants and other similar funding opportunities that may become available to refurbish and/or create additional housing and related work.
 - b) Verify information of each household member through the Enterprise Income Verification (EIV) for debts owed to other housing authorities and for double subsidy.
 - c) Monitor the Deceased Tenants Report available in EIV.
- B. Improve the quality of assisted housing
 - 1. Improve Section 8 Management Assessment Program (SEMAP) Score
 - a) Maintain High Performer status under Section 8 Management Assessment Program (SEMAP).
 - b) Continue the applicability of EIV's Income Information and Verification Reports (i.e. Multiple Subsidy Report, Identity Verification Report, Immigration Report, and Income Validation Tool Report).
 - 2. Increase customer satisfaction
 - a) Provide improved communication with management.
 - b) Section 8 will continue to receive and assess customer surveys to improve communication.
- C. Increase assisted housing choices
 - 1. Applicants and current participants will be advised of housing opportunities.
 - 2. May elect to dissolve the waiting lists periodically or as needed.
 - 3. Increase voucher usage
 - a) May consider adding preferences to its admission policy to better assist elderly, special needs families, project-based vouchers, and eligible applicants.
- D. Improve community quality of life and economic vitality
 - 1. May apply for grants and other funding sources to provide additional services for assisted housing programs.
 - 2. May request extension of grant obligations and expenditure deadlines as it may deem necessary.
 - 3. Encourage a smoke-free policy pursuant to Miami-Dade County Commissioners Resolution Nos. R-1003-15 and R-582-16.
- E. Promote partnerships with job training and placement organizations
 - 1. Increase the number of employed persons in assisted families.
 - a) Continue providing Earned Income Disallowance (EID) to qualified families.
- F. Ensure Equal Opportunity in Housing for all Americans
 - 1. Continue to implement the Limited English Proficiency (LEP) policy.
 - 2. Continue with affirmatively furthering fair housing to ensure equal opportunity regardless of race, national origin, ethnic origin, color, sex, religion, age, disability, familial status, marital status, ancestry, status as victim of domestic violence, dating violence or stalking, actual or perceived sexual orientation, gender identity, gender expression, pregnancy or source of income.

SECTION B.3- Progress Report

I. Increased the availability of affordable housing that reflect HUD and local requirements

- A. Expanded the supply of assisted housing
 - 1. Leverage private or other public funds and/or generate revenue to create additional housing opportunities.
 - a) Increased collection of outstanding debt from prior participants due to the information entered in Debts Owed to PHAs.
 - b) Avoided double subsidy cases by identifying applicants receiving housing assistance during initial screening.
 - c) Increased availability by terminating housing assistance to single households listed on the Deceased Tenants Report.
- B. Improved quality of assisted housing
 - 1. Section 8 Management Assessment Program (SEMAP) Score
 - a) Pursuant to HUD's approval of PHCD's request to waive 24 CFR §985.101(a), PHCD's rating as a High Performer (scored 93 percent) under SEMAP for fiscal year ended September 30, 2016, will be carried over for the fiscal year ended September 30, 2017. Note that the waiver was granted pursuant to the notice published in the federal register on October 6, 2017: Relief from HUD Requirements Available to PHAs To Assist With Recovery and Relief Efforts on Behalf of Families Affected by Hurricanes Harvey, Irma, Maria and Future Natural Disasters Where Major Disaster Declarations Might Be Issued in 2017 (Docket No. FR-6050-N-01).
 - b) Increased customer satisfaction.
- C. Increased assisted housing choices
 - 1. Continued processing applications received during the open registration periods of 2008 for the Section 8 Housing Choice Voucher and 2014 for the Section 8 Moderate Rehabilitation Programs.
 - 2. Increased voucher implementation by streamlining the screening process and reducing voucher turnaround time.
- D. Improved community quality of life and economic vitality
 - 1. Increased the availability of affordable housing that reflect HUD and local requirements.
- E. Ensured Equal Opportunity in Housing for all Americans
 - 1. Entered into a contract for oral and written translations.
 - 2. Continued to provide reasonable accommodations for housing programs and services to persons with disabilities.