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

Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on <u>both</u> of 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, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

	PHA Information.						
	PHA Name: Housing Authority of the City of Arlington PHA Code: TX43						
	PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2020						
	PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) 3,819						
	PHA Plan Submission Type: Annual Submission						
	Likevised 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.						
	PHA Consortia: (Check	c box if submittin	g a joint Plan and complete table bel	ow)			
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the	No. of Units in Each Program		
-	Participating PHAs Lead HA:	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		
		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		
-		PHA Code	Program(s) in the Consortia		No. of Units in Each Program		

B.	Annual Plan.	
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. 	
	 Substantial Deviation. Substantial Deviation. Significant Amendment/Modification. If the PHA answered yes for any element, describe the revisions for each element(s): 	
	Added National, State and Local Emergency Declaration Procedures Accepted HUD approved waivers due to COVID (see Attachment A)	
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. Image: Description of 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.	
	Describe Activity - Rehab or redevelopment Projected number of PBV - 100 Consistent with PHA plan - expanding the of assisted living and increasing assisted housing choices	
B.3	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N N/A Image: Second Sec	
B.4	Civil Rights Certification Form HUD-50077 PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.	
B.5	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.	
B.6	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan. See Attachment B	
B. 7	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) provide comments to the PHA Plan?	
	 Y N N I (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. 	

Attachment B

Streamlined Annual PHA Plan Housing Authority of the City of Arlington, TX433 Section B.6 – Progress Report - reflecting updates for FY2019 (10/1/18 – 9/30/19)

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

1. Goal: Expand the supply of assisted housing Objectives:

Apply for additional rental vouchers, as they come available

- AHA applied / received additional \$61,135 HHSP Youth funding
- Received 50 Mainstream Vouchers and 10 VASH vouchers. Approved by HUD for Move To Work Cohert #2

Leverage private or other public funds to create additional housing opportunities

- During FY2019, in cooperation with the City of Arlington, the AHA rehabilitated 45 housing units for low to moderate income households, improving the living conditions for each assisted household through the Housing Rehabilitation Program (HRP)
- Applied for funding through the Texas Department of Housing and Community Affairs (TDHCA) for the Amy Young Barrier Removal Program (AYBRP) to assist households with persons with disabilities, making their homes more accessible; Completed 4 homes.
- Assisted repairs of 3 homes through the City of Arlington's Code Compliance Home Program.
- Facilitated City Council support of tax credit developments to increase the supply of affordable housing for both seniors and working families, resulting in 2 new properties and approximately 290 new units in FY19.
- With the Arlington Housing Finance Corporation, partnered with a developer to remodel housing developments, resulting in 350 additional affordable units.

2. Goal: Improve the quality of assisted housing

Objectives:

Improve voucher management: (SEMAP score)

- Maintained HUD High Performer status and closely monitored Small Area Fair Market Rents to facilitate families' ability to move to areas of greater opportunity and achieve SEMAP points for de-concentration.
- FY2019 SEMAP received bonus points for De-Concentration.

Increase customer satisfaction

• Continue to receive comments through the customer service satisfaction survey available via employee email signature block, receiving 117 surveys with 86% excellent/good rating.

3. Goal: Increase assisted housing choices Objectives:

Provide voucher mobility counseling

• Held portability briefings weekly for voucher holders.

Conduct outreach efforts to potential voucher landlords

- Provided 1 landlord briefing (9/16/19) and participated in 1 landlord events coordinated by the City of Arlington (5/31/19).
- 119 new landlords were added to the program.
- Efforts to bring housing tax credit properties to the City has resulted in 1 new/rehabilitated complex that provided additional affordable housing options to participants.
- Produced 2 new HCV homeowners.

4. Goal: Provide an improved living environment

<u>Objectives: Other – foster livable neighborhoods and celebrate diversity</u>

Progress:

- Used HCV program to expand housing opportunities beyond areas of traditional low-income and minority concentration; distributed maps at each briefing session for HCV applicants which delineate areas of the City of Arlington with lesser concentrations of poverty.
- Facilitated support for tax credit developments in areas of the City with higher opportunities for families.

5. Goal: Promote self-sufficiency and asset development of assisted households Objectives:

Provide or attract supportive services to improve assisted recipients' employability

- Participated in Arlington Resource Sharing Group's monthly meetings; shared new support services resources with staff to provide to clients; shared Housing's list of resources with other agencies participating in the meetings.
- One staff completed FSS Coordinator case management training through Nan McKay
- 8 Peer Support meetings were held for participants.
- Continue to provide monthly life skills and other classes to FSS and homeless clients, posting calendar on website

Provide or attract supportive services to increase independence for the elderly or families with disabilities

- Participated in the City of Arlington's Homeownership Fair promoting Housing Rehab Program (7/19/19).
- Participated in the Aging Well Expo (2/21/19) providing information on our different grants and opportunities for elderly and disabled households.
- Managed the Housing Rehab Program which provides grants to modify housing, making it accessible for persons with disabilities: assisted 65 families.
- Received funding through TDHCA for the Amy Young Barrier Removal Program to assist households with persons with disabilities, making their homes more accessible: completed 4 projects
- Received 50 Mainstream Vouchers for FY2019, first distribution was in November 2018.
- 6. Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:

<u>Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability</u>

• Maintained an environment that promotes, educates, and encourages staff and the public, displaying updated Fair Housing and Equal Housing Opportunities signage in multiple languages throughout the office and public areas, including on lobby monitors.

Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability

• Applied for Fair Housing Initiative Program, Education and Outreach Initiative (EOI), which provides funding to develop and implement education and outreach programs designed to inform members of the public concerning their rights and obligations under the provisions of the Fair Housing Act. (Reso 20-05, 02/2020).

Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required

- When needed, persons with disabilities are encouraged to request a disability rent exception which can increase the payment standard up to 120% of FMR.
- When needed, persons with disabilities have the opportunity to request an additional bedroom as a medical room or a live-in aide.

PLAN ELEMENTS

1. HOUSING NEEDS AND STRATEGY FOR ADRESSING HOUSING NEEDS – Provide a statement addressing the housing needs of low-income, very low-income families who reside in the PHA's jurisdiction and other families who are on the Section 8 tenant-based waiting list. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location (24 CFR 903.7(a)(1) and 24 CFR §903.7(a)(2)(i)). Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR 903.7(a)(2)(ii).

The City of Arlington's 2015 – 2019 Consolidated Plan identifies Housing needs of low- income, very low-Income and extremely low- income households in Arlington. The Consolidated Plan is available by clicking on the link below.

https://arlingtontx.gov/UserFiles/Servers/Server_14481062/File/City%20Hall/Depts/Office%20of%20Strat egic%20Initiatives/Grants%20Management/Planning%20and%20Reporting/2015-2019 Consolidated Plan.pdf

A summary of the housing needs is identified below. Information about families on the Arlington Housing Authority's (AHA) Housing Choice Voucher waiting list is also provided below.

The City of Arlington's 2015 - 2019 Consolidated Plan reported that in 2011 the City of Arlington's population consisted of 363,933 residents including 132,182 households, representing a 9% and 6% increase, respectively, from the 2000 Census. 2011 Median household income is identified at \$52,699¹. Effective March 2016, median household income in Arlington is \$69,400².

The City of Arlington's 2015 – 2019 Consolidated Plan reported housing inventory increased by 14,923 units (11.4%) since 2000.³ This growth is due to an increase in owner-occupied housing. The City's inventory of renter–occupied units decreased by 599 units or (1.1%) since 2000.

There is a significant gap in the supply of affordable renter units for "extremely" low income households but sizable gaps also exist within the price ranges of "moderate" and "upper" (over 120% of median family income) renter household income categories.

The City of Arlington's 2015 - 2019 Consolidated Plan reported approximately 51% of households earn less than 100% of area median income and 40% of households are defined as low and moderate income earning less than 80% of area median income. Households with one or more children under the age of 6 were the household type with the greatest percentage of households earning under 100% or average family median income (67%), while small families and households with at least one person between 62 – 74 years of age had the lowest percentage (41% and 42% respectively).

¹ 2007- 2011 American Community Survey

² HUD Income Limits published 3/28/16

³ 2008-2012 American Community Survey

Housing units that do not meet minimum safe and sanitary thresholds are categorized as having a "housing problem." The Consolidated Planning guidelines define housing problems as one of four living conditions:

- Lacking complete plumbing (including hot and cold running water, a flush toilet, and a bathtub or shower)
- Lacking complete kitchen facilities (including a kitchen sink; a cooking stove, built-in burners, or a microwave oven; and a refrigerator)
- Overcrowding with more than 1.01 persons per room (not including bathrooms, porches, foyers, halls, or half rooms}
- Spending more than 30% of household income on housing
- Severe housing problems are a subset of the above conditions. The first two conditions (lacking complete plumbing or kitchen facilities} are considered to be severe enough as defined above. The second two are only considered severe if households experience:
 - Overcrowding with more than 1.51 persons per room (not including bathrooms, porches, foyers, halls, or half rooms)
 - Spending more than 50% of household income on housing

The City of Arlington's 2015 - 2019 Consolidated Plan states that while some households with incomes in the HUD defined categories i.e.; low income (50–80% of area median income), very low (30 - 50%) and extremely low income (0-30%), experienced one or more of the four housing problems identified above, based on the data, a disproportionally greater housing need does not exist with any of the racial or ethnic groups.

Cost burden is the greatest housing problem City of Arlington residents face as overcrowding and substandard housing are minimal compared to those experiencing cost burden. Housing cost burden is by far the most common housing problem among all income and racial groups. Very low income households are most in need of temporary rental housing assistance to maintain stable rental housing. No racial or ethnic group clearly presents a disproportionately greater need with regard to housing cost burden or severe housing problems identified above.

The City of Arlington's 2015 - 2019 Consolidated Plan reported approximately 69% of households earning less than 80% of area median income paid more than 30% of their income for rent (69% renter households and 66% homeowner households were cost burdened). Of those households experiencing a severe cost burden (paying more than 50% of income for housing), the City's lowest income rental households (those earning less than 50% of the area median income), comprise the vast majority. Approximately 95% of severely cost burdened renter households and 73% of severely cost burdened owner households earned less than 50% area median income.

As of April 2019, the AHA assists 3,493 households in its Housing Choice Voucher program and 88 households with rental housing assistance through other programs dedicated to assist the homeless including the HOME funded Tenant Based Rental Assistance program and HUD funded Continuum of Care (CoC) programs (Shelter Plus Care and Rapid Rehousing). Homeless assistance resources are provided using the best practices Housing First model. These rental housing assistance resources are tenant-based utilizing privately owned rental housing units. Additionally, the AHA administers the Homeless Housing and Services Program (HHSP), using the state of Texas resources, for homeless prevention.

In 2015, in an effort to expand accessibility to housing services, the AHA transitioned the management and maintenance of its Housing Choice Voucher program waiting list to an annual open enrollment process where the application remains valid for one year. In 2018, the AHA received 14,968 unduplicated applications for HCV assistance within seven (7) days. Applications received will remain valid for one year. All unassisted applicants may reapply for assistance during the next annual open enrollment.

Thirty-two percent of the applications received either live in or work in Arlington. Sixty-eight percent of the applications received were from persons who reside outside of Arlington or the state of Texas.

Forty-six percent of AHA HCV program participants are elderly (age 62 or older) and/or persons with a disability, 95 percent are employed, and 5 percent have no income.

The City of Arlington's 2015 – 2019 Consolidated Plan states the City must also address the age and housing conditions of its housing stock. To address the needs of the community, the AHA manages and operates the Housing Rehabilitation program. Through this CDBG and HOME funded resource, the AHA rehabilitates approximately 75 substandard owner-occupied homes in Arlington each year.

The AHA will, to the maximum extent feasible, utilize all federal, state and local resources for their intended purposes. Through these resources the AHA is: housing the homeless; preventing homelessness before it occurs for persons in imminent danger of becoming homeless; providing safe, decent and affordable rental housing; coaching rental housing participants to become economically self-sufficient; rehabilitating substandard owner-occupied housing units with Federal and non-Federal funds; and assisting persons to become first time homebuyers.

- 2. **DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS** *A* statement of the AHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences in the Housing Choice Voucher program are found in the Administrative Plan. (24 CFR 903.7(b)
 - a. Eligibility requirements are found in Chapter 2 "Eligibility for Admission" of the Administrative Plan of the AHA.
 - b. Selection criteria are found in Chapter 3 "Applying for Admission" and Chapter 4 "Establishing Preferences and Maintaining the Waiting List" and subsidy standards are found in Chapter 5 "Subsidy Standards" in the Administrative Plan of the AHA.
 - c. Deconcentration is found in Chapter 1 "Statement of Objectives and Policies" and Chapter 8 "Voucher Issuance and Briefings", and the Fair Housing Policy in Chapter 1 in the Administrative Plan of the AHA.
 - d. Waiting list procedures are found in Chapter 4 "Establishing Preferences and Maintaining the Waiting List" in the Administrative Plan of the AHA.
 - e. The Administrative Plan can be found on the AHA website by clicking the link below, and is available for review at the AHA office.

https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

3. **FINANCIAL RESOURCES** - A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR 903.7(c)

The AHA financial resources include HUD contributions and income from interest on reserves. The AHA operating budget is available for review upon request with includes:

Source	Use
Housing Choice Voucher	Housing Assistance Payments and Operations
Continuum of Care	Housing Assistance Payments and Operations
(Shelter Plus Care and Rapid Re-Housing)	
Tenant Based Rental Assistance	Housing Assistance Payments and Operations
Homeless Housing Services Program	Eviction Prevention, Homeless Assistance & Operations
Tenant Rent	Leverages HCV rental payments
Match	Case management, supportive services

 RENT DETERMINATION – A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies. (24 CFR 903.7(d)

Policies governing rents charged for Housing Choice Voucher dwelling units are contained in the AHA's Administrative Plan which can be found on the AHA website by clicking the link below, and is available for review at the AHA office.

https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

5. **OPERATION AND MANAGEMENT** – A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA. (24 CFR 903.7(e)(3)(4)

This section applies only to public housing. The AHA does not operate or manage public housing or any other rental housing. Information about AHA management relative to the administration of the Housing Choice Voucher program is found in Chapter 1 of the AHA's Administrative Plan which can be found on the AHA website by clicking the link below, and is available for review at the AHA office.

https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

6. **INFORMAL REVIEW AND HEARING PROCEDURES** - A description of the informal hearing and review procedures that the PHA makes available to its applicants. (24 CFR 903.7(f)

Information about the AHA's policies governing Informal Reviews and Informal Hearings are found in Chapter 18 of the AHA's Administrative Plan which can be found on the AHA website by clicking the link below, and is available for review at the AHA office. https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

7. **HOMEOWNERSHIP PROGRAMS** – A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval. (24 CFR 903.7(k)

Information about the AHA's homeownership programs is found in Chapter 20 of the AHA's Administrative Plan which can be found on the AHA website by clicking the link below and is available for review at the AHA office.

https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

8. SELF SUFFICIENCY PROGRAMS AND TREATMENT OF INCOME CHANGES RESULTING FROM WELFARE PROGRAM REQUIREMENTS - A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities under section 3 of the Housing and Community Development Act of 1968 and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR 903.7(I)(i) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements. (24 CFR 903.7(I)(iii)

Information about the AHA's Family Self Sufficiency Program is found in Appendix 16 of the AHA's Administrative Plan which can be found on the AHA website by clicking the link below, and is available for review at the AHA office.

https://www.arlingtontx.gov/city_hall/departments/housing_authority/more_information/publications

9. SUBSTANTIAL DEVIATION – PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24CFR 903.7(r)(2)(i)

The AHA shall define a Substantial Deviation from the five-year plan as follows.

- A major change in the direction of the AHA pertaining to its mission and goals would constitute a "substantial deviation" from the Agency's Five Year Plan.
- Examples include the undertaking of new program activities, development strategies, or financing initiatives that do not otherwise further the AHA's stated mission and goals identified in its Five Year Plan.

This includes elimination or major changes in any activities proposed or policies provided in the agency plan that would momentously affect services or programs provided to residents. This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

- 10. SIGNIFICANT AMENDMENT/MODIFICATIONS PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; or b) any change with regard to homeownership programs. See guidance on HUD's website at: <u>Notice PIH 1999-51</u>. (24 CFR 903.7(r)(2)(ii) The AHA shall define a Significant Amendment or Modification to the annual and 5-year plan as follows.
 - Changes of a sufficient nature to the rent, admissions policies, or the organization of the waiting list in the Housing Choice Voucher program that impact more than 10% of applicants or households assisted through the Housing Choice Voucher program where such changes are not required by federal regulatory requirements.
 - This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD regulations, or minor policy changes.

Exceptions:

- Changes under the above definitions that are required due to HUD regulations, federal statutes, Presidential Executive Orders, State or Local Laws or Ordinances, or as a result of a declared national or local emergency will not be considered a substantial deviation or significant amendment or significant modification.
- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.