

Trenton Housing Authority
FY2025
Annual Plan

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	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.

A.	PHA Information.																																				
A.1	<p> PHA Name: <u>The Housing Authority of the City of Trenton</u> PHA Code: <u>NJ005</u> PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>1/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1496</u> Number of Housing Choice Vouchers (HCVs) <u>0</u> Total Combined Units/Vouchers <u>1496</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </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 data-bbox="180 1482 456 1549">Participating PHAs</th> <th data-bbox="456 1482 586 1549">PHA Code</th> <th data-bbox="586 1482 886 1549">Program(s) in the Consortia</th> <th data-bbox="886 1482 1159 1549">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1159 1482 1464 1549">No. of Units in Each Program</th> </tr> <tr> <th></th> <th></th> <th></th> <th></th> <th data-bbox="1159 1549 1304 1654">PH</th> <th data-bbox="1304 1549 1464 1654">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="180 1549 456 1654">Lead PHA:</td> <td data-bbox="456 1549 586 1654"></td> <td data-bbox="586 1549 886 1654"></td> <td data-bbox="886 1549 1159 1654"></td> <td data-bbox="1159 1549 1304 1654"></td> <td data-bbox="1304 1549 1464 1654"></td> </tr> <tr> <td data-bbox="180 1654 456 1759"></td> <td data-bbox="456 1654 586 1759"></td> <td data-bbox="586 1654 886 1759"></td> <td data-bbox="886 1654 1159 1759"></td> <td data-bbox="1159 1654 1304 1759"></td> <td data-bbox="1304 1654 1464 1759"></td> </tr> <tr> <td data-bbox="180 1759 456 1864"></td> <td data-bbox="456 1759 586 1864"></td> <td data-bbox="586 1759 886 1864"></td> <td data-bbox="886 1759 1159 1864"></td> <td data-bbox="1159 1759 1304 1864"></td> <td data-bbox="1304 1759 1464 1864"></td> </tr> <tr> <td data-bbox="180 1864 456 1919"></td> <td data-bbox="456 1864 586 1919"></td> <td data-bbox="586 1864 886 1919"></td> <td data-bbox="886 1864 1159 1919"></td> <td data-bbox="1159 1864 1304 1919"></td> <td data-bbox="1304 1864 1464 1919"></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:																							
Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																																	
				PH	HCV																																
Lead PHA:																																					

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): See Attachment A</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. See Attachment B</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project-Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>See Attachment C</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>See Attachment D</p>

B.4	<p>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.</p> <p>The most recent 5YAP (2023-2027) approved 9/17/2024</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/> See finding comment attached</p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<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>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
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.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

**Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs**

ATTACHMENT A

Revision of Existing PHA Plan Elements

Attachment A

B.1 Revision of Existing PHA Plan Elements

The Trenton Housing Authority (THA) revised its Admissions and Continued Occupancy Policy (ACOP). As of result of these revisions the following addendums have been made to the following sections of the ACOP.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Chapter 2

ELIGIBILITY FOR ADMISSION [24 C.F.R. 960 Subpart B]

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and THA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Admission. This part covers factors related to an applicant's past or current conduct (e.g., criminal activity) that can cause the THA to deny admission as well as the asset limitation for public housing.

Chapter 5

OCCUPANCY STANDARDS AND UNIT OFFERS

The PHA must establish policies governing occupancy of dwelling units and offering dwelling units to qualified families. This chapter contains policies for assigning unit size and making unit offers. Policies in this chapter are organized in two parts.

Part I: Occupancy Standards. This part contains the PHA's standards for determining the appropriate unit size for families of different sizes, compositions, and types.

Part II: Unit Offers. This part contains the PHA's policies for making unit offers and describes actions to be taken when unit offers are refused.

Chapter 7

VERIFICATION PROCEDURES

[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2023-27]

The THA must follow the verification guidance provided by HUD in Notice PIH 2023-27.

Part I describes the general verification process.

Part II provides more detailed requirements related to family information.

Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the THA.

Chapter 8

TRANSFER POLICY

This chapter explains THA's transfer policy, based on HUD regulations, and HUD guidance.

This chapter describes HUD regulations and THA policies related to transfers in four parts:

Part I: Emergency Transfers. This part describes emergency transfers, emergency transfer procedures, and payment of transfer costs.

Part II: THA Required Transfers. This part describes types of transfers that are required by THA, notice requirements, and payment of transfer costs.

Part III: Transfers Requested by Residents. This part describes types of transfers that may be requested by residents, eligibility requirements, security deposits, payment of transfer costs, and handling of transfer requests.

Part IV: Transfer Processing. This part describes creating a waiting list and prioritizing transfer requests.

Chapter 9

LEASING

[24 C.F.R. 966.4]

This chapter is divided into two parts as follows:

Part I: Leasing. This part describes pre-leasing activities and the THA's policies pertaining to lease execution, lease modification, and payments under the lease.

Part II: Inspections. This part describes the THA's policies for inspecting dwelling units and notifying families of HUD REAC NSPIRE inspections.

Chapter 13

LEASE TERMINATIONS

[24 C.F.R. 966.4]

Part I: Termination by Tenant. This part discusses the THA requirements for voluntary termination of the lease by the family.

Part II: Termination by THA - Mandatory. This part describes circumstances when termination of the lease by the THA is mandatory. This part also explains nonrenewal of the lease for noncompliance with community service requirements and families that have been over the income limit for 24 consecutive months.

Chapter 18

PROGRAM INTEGRITY ADDENDUM

Part I: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents PHA policies related to preventing, detecting, and investigating errors and program abuse.

Part II: Corrective Measures and Penalties. This part describes the corrective measures the PHA must and may take when errors or program abuses are found.

Rent Determination

Chapter 6

INCOME AND RENT DETERMINATION

[24 CFR Part 5, Subparts E and F; 24 CFR 960, Subpart C]

Part I: Annual Income. HUD regulations specify the sources of income which are excluded from the family's annual income. These requirements and THA policies for calculating annual income are found in Part I.

Part II: Assets. HUD regulations specify the types of assets which are excluded from a family's annual income. These requirements and THA policies for calculating income from assets are found in Part II.

Part III: Adjusted Income. Once annual income has been established, HUD regulations require the THA to subtract from annual income any of five mandatory deductions for which a family qualifies and allow the THA to adopt additional permissive deductions. These requirements and PHA policies for calculating adjusted income are found in Part III.

Part IV: Calculating Rent. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining family rent payment. Also included here are flat rents and the family's choice of rent.

Chapter 12

RECERTIFICATIONS

[24 C.F.R. 5.613, 24 C.F.R. 5.61524 C.F.R. Part 960 Subpart C]

This chapter discusses both annual and interim reexaminations.

Part I: Annual Reexaminations for Families Paying Income Based Rents. This part discusses the requirements for annual reexamination of income and family composition. Full reexaminations are conducted at least once a year for families paying income-based rents.

Part II: Reexaminations for Families Paying Flat Rents. This part contains the PHA's policies for conducting full reexaminations of family income and composition for families paying flat rents. These full reexaminations are conducted at least once every three years. This part also contains the THA's policies for conducting annual updates of family composition for flat rent families.

Part III: Interim Reexaminations. This part includes HUD requirements and THA policies related to when a family may and must report changes that occur between annual reexaminations.

Part IV: Recalculating Tenant Rent. After gathering and verifying required information for an annual or interim reexamination, the THA must recalculate the tenant rent. While the basic policies that govern these calculations are provided in Chapter 6, this part describes the policies that affect these calculations during a reexamination.

Part V: Non-Interim Reexamination Transactions. This part describes transactions that do not entail changes to the family's adjusted income.

Grievance Procedures

Chapter 14

COMPLAINTS, GRIEVANCES AND APPEALS

[24 C.F.R. Part 966 Subpart B]

The policies are discussed in the following three parts:

Part I: Informal Hearings for Public Housing Applicants. This part outlines the requirements and procedures for informal hearings for public housing applicants.

Part II: Informal Hearings with Regard to Noncitizens. This part discusses informal hearings regarding citizenship status and where they differ from the requirements for general applicant and tenant grievances.

Part III: Grievance Procedures for Public Housing Residents. This part outlines the requirements and procedures for handling grievances for public housing residents.

Significant Amendment/Modification

The Trenton Housing Authority (THA) revised its Admissions and Continued Occupancy Policy (ACOP).



Trenton Housing Authority

Admissions and Continued Occupancy Policy (ACOP) – Summary of Updates

September 1, 2024

	Chapter Name / Subject Area	Source	Existing ACOP	Proposed ACOP
1.	Chapter 1: Overview of the Program and Plan	<ul style="list-style-type: none"> Housing Opportunity Through Modernization Act of 2016 – Final Rule (HOTMA Final Rule) 	<ul style="list-style-type: none"> Not in current ACOP 	<ul style="list-style-type: none"> Adds section introducing the Housing Opportunity through Modernization Act (HOTMA) Final Rule and related guidance. THA is awaiting further guidance from HUD regarding the implementation of the HOTMA provisions and related requirements. THA will update the ACOP and its policies as needed to reflect any subsequent guidance released by HUD pertaining to HOTMA, the Final Rule, and other related regulatory requirements. THA will comply with the HOTMA Final Rule and all requirements.
2.	Chapter 1: Housing Authority Mission Statement	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> The THA is committed to building and maintaining affordable housing for citizens in our community. We seek to create safe neighborhoods by partnering with.... 	<ul style="list-style-type: none"> The Trenton Housing Authority (THA) is committed to providing decent, safe and sanitary affordable housing that is well constructed, carefully maintained and expertly managed. We seek to identify projects that have the potential to act as catalyst for the revitalization of neighborhoods in the City of Trenton. We promote self-sufficiency among the families that reside in our communities by partnering with local agencies and organizations to provide education, training, employment and business opportunities.

3.	Chapter 2: Eligibility & Suitability	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Added to existing section on eligibility requirements 	<ul style="list-style-type: none"> Added the following list of general eligibility requirements. To be eligible for THA Public Housing program, the applicant family must: <ul style="list-style-type: none"> Part I Definitions of Family and Household Members Part II Basic Eligibility Criteria Part II Denial of Admissions
4.	Chapter 2: Eligibility & Suitability	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Revised existing definition of "Family." 	<ul style="list-style-type: none"> Updated definition of "Family" to include: an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act and is homeless at age 16 or older.

	Chapter Name / Subject Area	Source	Existing ACOP	Proposed ACOP
5.	Chapter 3 Applying For Admission	<ul style="list-style-type: none"> FSS Final Rule & 24 CFR 984 Regulations 	<ul style="list-style-type: none"> Added reference 	<ul style="list-style-type: none"> Family Self Sufficiency Life Skills Assessment

5.	Chapter 5: Occupancy Standards and Unit Offers	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Added new section & Updated section 	<ul style="list-style-type: none"> Adds language that – upon implementation of the HOTMA Final Rule – restricts families from receiving public housing assistance at initial admission and continued occupancy / recertification if their net family assets exceed \$100,000 (as adjusted annually) or if the family owns real property deemed suitable for the family to live in. THA will delay termination of assistance for recertifying households only for up to 6 months and the family will be given the opportunity to come into compliance with the asset policies during that time. There is no exception for new admission households to this restriction of assistance based on assets. In selecting a family to occupy a particular unit, the THA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].
6.	Chapter 6: Income and Rent Determination	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Updated section to include revisions suggested 	<ul style="list-style-type: none"> Part I Annual Income Part II Assets: Updated language to reflect HOTMA policies related to assets and determining asset income. Part III Adjusted Income: Added language about the discontinuance of the EID upon implementation of HOTMA. Part VI Calculating Rent: Added links to sections on Alternative Rent for NPHOI Families.
7.	Chapter 7: Verification Procedures	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Updated section to include revisions suggested 	<ul style="list-style-type: none"> Part I Describing the general verification process. Added language to comply with HOTMA guidance that Form HUD-9886 will no longer be required to be signed at every recertification, and that revocation of consent to the HUD-9886 form will result in denial or termination of assistance. Part II Providing more detailed requirements related to family information Part III Providing information on income and assets. Updated language to state that EIV income reports (including IVT reports) are no longer required to be run when completing interim reexaminations, unless the family is reporting zero income, or for other administrative reasons. Part VI Covering mandatory deductions
8.	Chapter 8: Transfer Policy	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Annual Income and Annual Income Exclusions sections 	<ul style="list-style-type: none"> Updated definition of annual income to reflect updated HOTMA requirements.

	Chapter Name / Subject Area	Source	Existing ACOP	Proposed ACOP
9.	Chapter 9: Leasing	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Updated section to included revisions suggested 	<ul style="list-style-type: none"> Part I Leasing Part II Inspections covering HUD REAC INSPIRE inspections Added section on lease requirements for NPHOI families and information on previously paid security deposits.
10.	Chapter 12: Recertifications	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Updated section to included revisions suggested Interim Recertification Section 	<ul style="list-style-type: none"> Part I Annual Reexaminations for Families Paying Income Based Rents. Part II Reexaminations for Families Paying Flat Rents =. Part III Interim Reexaminations. Part IV Recalculations Tenant Rent Part V Non-Interim Reexamination Transactions
11.	Chapter 13: Lease Terminations	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Mandatory Terminations Section 	<ul style="list-style-type: none"> Part I Termination by Tenant Part II Termination by THA Added section on Over-Income families, per HOTMA requirements. Removed existing Over-Income Families section as the information has been added to and updated in other sections of this ACOP.
	Chapter Name / Subject Area	Source	Existing ACOP	Proposed ACOP
12.	Chapter 14: Complaints, Grievances and Appeals	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> Updated section to included revisions suggested 	<ul style="list-style-type: none"> Part I Informal Hearings for Public Housing Applications Part II Informal Hearings with Regard to Noncitizens Part III Grievance Procedures for Public Housing Residents

26.	Chapter 20: Program Integrity	<ul style="list-style-type: none"> HOTMA Final Rule 	<ul style="list-style-type: none"> THA Caused Errors or Program Abuse section 	<ul style="list-style-type: none"> Part I Preventing, Detecting, and Investigating Errors and Program Abuse Part II Corrective Measures and Penalties Updated language to reflect HOTMA requirements regarding corrective actions to resolve resident overpayments due to THA error (de minimis or otherwise). In cases of overpayment of rent due to THA error, THA will adjust the tenant rent retroactive to the effective date of the action that the error was made (regardless of the dollar amount associated with the error) and will provide the resident with a credit towards their rent.
27.	Chapter 19: Carl Miller Homes Hope VI reference	<ul style="list-style-type: none"> Carl Miller Homes Hope VI Revitalization Rights of Returning Residents 	<ul style="list-style-type: none"> Carl Miller Homes Hope VI Revitalization Rights of Returning Residents <ul style="list-style-type: none"> Introduction <ul style="list-style-type: none"> A. Priority for B. Exercising Right to Return 	<ul style="list-style-type: none"> Remove reference from ACOP

ATTACHMENT B

Deconcentration Policy

Deconcentration Policy

If at annual recertification, there is found to be development(s) with average income above or below the EIR, and where the income profile for a general occupancy development above or below the EIR is not explained or justified in the THA Plan, the THA shall list these covered developments in the Annual Plan.

The THA shall adhere to the following policies for deconcentration of poverty and income mixing in applicable developments:

Skipping a family on the waiting list to reach another family in an effort to further the goals of the THA deconcentration policy.

If a unit becomes available at a development below the EIR, the first eligible family on the waiting list with income above the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list with income above the EIR, or if no family with income above the EIR accepts the offer, then the unit will be offered to the first eligible family on the waiting list in preference order regardless of income.

Skipping of families for deconcentration purposes will be applied uniformly to all families.

A family has the sole discretion whether to accept an offer of a unit made under the THA's deconcentration policy. The THA shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the THA's deconcentration policy. However, the THA shall uniformly limit the number of offers received by applicants described in this Chapter.

Deconcentration Compliance

If, at annual recertification, the average incomes at all general occupancy developments are within the EIR, the THA will be considered to be in compliance with the deconcentration requirement.

ATTACHMENT C

New Activities

Attachment C

B.2 New Activities

Choice Neighborhoods / Mixed Finance Modernization or Development

The Trenton Housing Authority will conduct an authority-wide portfolio analysis of its housing stock. THA will then develop plans to modernize and / or preserve its housing stock. THA will look into all available sources of funding including local, state, and federal programs. These programs include but are not limited to the CHOICE Neighborhood Grant, Moving to Work Demonstration, Federal Home Loan Bank (FHLB-AHP), New Jersey Low Income Housing Tax Credits (LIHTC), CDBG, HOME and the Rental Assistance Demonstration (RAD) programs.

Demolition and/or Disposition

Frazier Court II (Campbell Homes Project)

The THA procured development partners for the Donnelly Homes and Prospect, Frazier, and Campbell Homes developments. All of these developments will either consist of new construction and/or Rental Assistance Demonstration (RAD) conversion. As a result, the THA may pursue a demolition and / or disposition applications approvals from HUD's SAC for all these developments.

Conversion of Public Housing to Project-Based Assistance under RAD

In the end 2024 or early 2025, the THA anticipates submitting RAD applications, which will allow the THA to reserve RAD conversion for Prospect Village, Frazier Courts, Lincoln Homes, Wilson Homes, and Haverstick Homes developments as well as the three senior/disabled apartment buildings.

Occupancy by Police

The City of Trenton has an emphasis on public safety. In partnering with the City of Trenton there may be opportunities of leasing public housing units to police officers for the purpose of increasing security for public housing residents.

Trenton Community Street Teams (TCST) is a community-based violence reduction initiative that complements traditional policing strategies with public health approaches, including relationship-based direct intervention, mentoring, and case management. The program helps community members most at risk of becoming a victim or perpetrator of violence connect to needed services and supports, mediate disputes, safely travel to and from school, and feel more connected to and

involved with their communities. The TCST is funded through a grant provided by the Department of Community Affairs, modeled after a successful program in Newark and will create its first hub in Donnelly Homes.

Units with Approved Vacancies for Modernization

The Trenton Housing Authority has approximately 30 vacant units that are targeted for modernization. The THA will modernize and occupy these units in 2025.

Other Capital Grant Programs

The Trenton Housing Authority will apply for any capital funding grants that we are eligible for as they become available such as Emergency Safety and Security Grant, Jobs Plus Initiative Grant, Choice Neighborhood Implementation Grant, Family Self-Sufficiency, etc.

ATTACHMENT D

Progress Report

Progress Report

THA continues to move forward toward meeting its Mission, Goals and Objectives:

- Toward the goal of increasing the supply of affordable housing, the THA has done the following:
 - Secured a \$15.6 million Choice Neighborhood Implementation grant for the Donnelly Homes North Trenton Battle Monument neighborhood. This neighborhood plan will replace current dated public housing stock and add affordable housing rentals totaling 639 units and 37 homeownership units throughout the North Trenton Neighborhood.
 - Procured a development partner for the redevelopment / demolition and new development of Frazier Court II (formerly Campbell Homes) and the conversion to RAD funding platform for Prospect Village and Frazier Court I.
- Toward the goal of improving the quality of assisted housing the THA has done the following:
 - Upgraded community space and common areas and added amenities where feasible.
 - Upgraded several video surveillance system throughout all THA properties (i.e., replaced existing obsolete cameras, identified areas for installation of new cameras).
 - Established aggressive lease enforcement actions surrounding quality of life issues (i.e., littering, illegal dumping, evictions of long-term debt holders).
 - Upgraded enterprise software system.
 - Installed Cameras in the hallways at Senior Buildings
 - New radios for Security and Maintenance Staff
 - New door hardware and security cameras in laundry rooms.

- Toward the goal of promoting self-sufficiency, the THA has done the following:
 - Received a HUD Family Self Sufficiency Program Coordinator grant. Family Self-Sufficiency Program (FSS) is a program that promotes independence, self-sufficiency, and goal setting among THA residents.
 - The FSS program currently has 32 families enrolled in the program and two families graduated and purchased their first home.
 - The THA has a very active Resident and Community Services department that has partnered with several local supportive services organizations to focus on providing education, youth education and recreation, community empowerment, workforce elevation, and local business partnership. The THA has implemented an aggressive Section 3 program designed to ensure that residents benefit from dollars being spent in connection with THA projects and programs.

- Toward the goal of improving the living environment, the THA has done the following:
 - Renovated and installed new equipment in laundry rooms at Lincoln, French, Frazier, Prospect Village, Abbott, and Josephson.
 - Secured over 70 vacant units utilizing DAWG systems (Door And Window Guards). This promoted less negative traffic and promoted a better quality of life for our tenants.
 - Completed the final phase of elevator replacement at Josephson Building and French Towers.
 - Repaired or replaced roof exhaust fans at the senior buildings to improve the air quality and place less stress on the heating and air conditioning systems.
 - Cleaned and deodorized the trash chutes and compactor rooms, at the senior buildings. Repaired or replace damage chute doors at French towers.
 - Supplied an aggressive fan coil, duct, and vent cleaning in every apartment in the senior building.
 - Cleaned and sealed all HVAC lines at Frazier Court to promote the longevity of the unit systems.
 - Cleaned, sealed, and repointed the exterior of French Towers to prevent water leaks from storms.

- Upgraded several video surveillance systems throughout all THA properties (i.e., replaced existing obsolete cameras, identified areas for installation of new cameras).
- Toward the goal of ensuring equal opportunity in housing for all Americans, the THA has established a regular training schedule for its staff in the areas of fair housing and equal opportunity.

RAB Board for Annual PHA Plan



Jelani Garrett
Executive Director

On Tuesday, August 27, 2024, senior management of the Trenton Housing Authority met with the Trenton Housing Authority's Resident Advisory Board (RAB) representing the residents of the Housing Authority. The THA staff discussed the various programs, initiatives, and plans for 2025 and the Housing Authority's approach for utilizing the anticipated funding. The review included an update on the North Trenton Battle Monument Choice Neighborhood Planning and Frazier Court II (former Campbell Homes).

Upon conclusion of the meeting, the representatives were pleased with the direction of the Housing Authority and did not provide any substantial comments to the HA's plan.

Violence Against Women Act (VAWA)

Violence Against Women Act (VAWA)

Violence Against Women Act (VAWA) requires PHAs to describe any goals, objectives, policies or programs that enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. The THA supports the goals and objectives of VAWA and will comply with its requirements.

- THA Safety Staff will respond immediately to all reports of domestic violence and immediately notify Police, Public Housing Managers and Resident Services of such acts of violence and request appropriate protections and services.
- The THA has completed a full review and revision of its Public Housing Admissions and Continued Occupancy Policy (ACOP) and Public Housing Lease in accordance with PIH-2017-08 notice, Violence Against Women Reauthorization Act of 2013. The THA has amended its lease to include the lease addendum for Violence Against Women and Justice Department Reauthorization Act of 2005. No perspective tenant that is the victim of domestic violence will be denied housing or no tenant will be evicted for same.
- The THA has partnered with Womanspace to provide ongoing training to THA staff. The Womanspace Community Education provides speakers for civic associations, community and faith-based organizations, businesses, schools and others who are interested in understanding interpersonal abuse and violence. By learning more about the issues, community members can become an integral part of the coordinated community response necessary to support victims and hold abusers accountable for their actions.

**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 3/31/2024

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

I, W. Reed Gusciora, the Mayor
Official's Name *Official's Title*

certify that the Annual PHA Plan for fiscal year 2025 of the Housing Authority of the City of Trenton
PHA Name
is consistent with the Consolidated Plan or State Consolidated Plan including the Analysis of
Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to
the City of Trenton pursuant to 24 CFR Part 91 and 24 CFR § 903.15.
Local Jurisdiction Name

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or
State Consolidated Plan.

The Trenton Housing Authority (THA) Annual Plan is consistent with the City of Trenton's
goals and mission to provide decent, safe and affordable housing for the residents of the city. In
addition, THA and the City share a common goal to improve the quality of life for residents of the
City of Trenton.

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:

W. Reed Gusciora

Title:

Mayor

Signature:



Date:

9.19.24

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. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.

PUBLIC NOTICE

The Housing Authority of the City of Trenton will hold an informational meeting open to the public on its 2025 ANNUAL PLAN on Monday, October 7, 2024. The meeting will be held at 2:00 pm in person at the THA Administration Building. The following is the meeting information: Questions can be emailed to administration@tha-nj.org 48 hours prior to the meeting date/time listed above.

THA Administration Building
875 New Willow Street
Trenton, NJ 08638

A DRAFT COPY OF THE ANNUAL PLAN IS AVAILABLE FOR REVIEW ON THE WEBSITE, www.tha-nj.org, IN THE ADMINISTRATION OFFICE AND AT THE HOUSING PROPERTY SITE MANAGEMENT OFFICES AFTER SEPTEMBER 1, 2024.

8/21/24

THE TIMES

\$14.82

RESOLUTION NO. 24-46

RESOLUTION OF THE HOUSING AUTHORITY OF THE CITY OF TRENTON (THA) APPROVING AND AUTHORIZING ITS EXECUTIVE DIRECTOR TO SUBMIT THE ANNUAL PLAN FOR FISCAL YEAR (FY) 2025 TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the Housing Authority of the City of Trenton (THA) is required to submit the Annual Plan in accordance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA); and

WHEREAS, the THA conducted a public hearing on October 7, 2024 in the development of that plan; and

WHEREAS, the THA has an established Resident Advisory Board (RAB), the membership of which represents the residents assisted by the THA; and

WHEREAS, the THA consulted with the RAB in developing the Plan and considered the recommendations of the RAB in the Plan; and

WHEREAS, the Plan is consistent with the Consolidated (Housing) Plan of the City of Trenton; and


WHEREAS, the Plan meets all of the certification requirements of the U.S. Department of Housing and Urban Development:

NOW THEREFORE BE IT RESOLVED, that the Board of Commissioners of the Housing Authority of the City of Trenton approves the Annual Plan for Fiscal Year (FY) 2025, and authorizes its Executive Director to submit said Plan to the U.S. Department of Housing and Urban Development.

Signed: 
Darlen Weldon-Gordon
Chairperson, Board of Commissioners

Date: October 9, 2024

I, Jelani B. Garrett, Secretary to the Board of Commissioners of the Housing Authority of the City of Trenton, hereby certify that at a meeting of the Board of Commissioners held on October 9, 2024, the above resolution was duly approved.

Signed: 
Jelani B. Garrett
Secretary to the Board of Commissioners

Date: October 9, 2024

**Certifications of Compliance with
PHA Plan 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 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson 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, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 1/2025, 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 (24 CFR § 91.2).
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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
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 provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. 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.
6. 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 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include 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 2011-65);

- 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; and
 - 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 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. 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.
 12. 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.
 13. 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.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. 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.
 16. 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.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. 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.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. 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.
 21. 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).

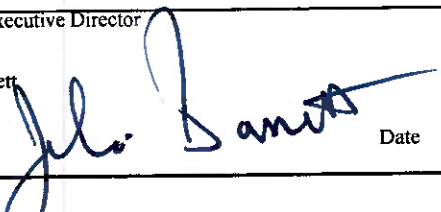

Housing Authority of the City of Trenton
PHA Name

NJ005
PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2025

 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).

<p>Name of Executive Director</p> <p>Jelani Garrett</p> <p>Signature  Date 10/9/2024</p>	<p>Name Board Chairman</p> <p>Darlene Weldon-Gordon</p> <p>Signature  Date 10/9/2024</p>
---	--

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 3/31/2024

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 Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 1/2025 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing 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 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

The Housing Authority of the City of Trenton
PHA Name

NJ005
PHA Number/HA Code

I hereby certify that all the statement above, 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 Executive Director:

Jelani B. Garrett

Signature

Date 10/9/2024

Name of Board Chairperson:

Darlene Weldon-Gordon

Signature

Date 10/9/2024

The United States Department of Housing and Urban Development is authorized to collect 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. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 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.