

HOUSING AUTHORITY OF
KANSAS CITY, MO

PHA ANNUAL PLAN SUBMISSION

2027



August 10, 2026

POSTING for Public Comment

The Housing Authority is seeking comments on its proposed 2027 Annual Plan. The proposed Plan are available for review by the public on HAKC's website at www.hakc.org. The proposed Plan are also available for review by the public during normal business hours at its offices and any of the public housing apartment complexes. Refer to HAKC's website at www.hakc.org for the location of offices and apartment complexes.

Written comments on the 2027 Annual Plan may be submitted to the Housing Authority through Noon on Thursday, September 24, 2026. Comments may be submitted by email to hakc@hakc.org; or dropped off in the lobby at 3822 Summit St., Kansas City, Missouri 64111-4652, Attn Taai Gumbel, Executive Assistant.

A public hearing on the proposed 2027 Annual Plan will be held on Monday, September 21st, 2026 at 5:30 PM in the Boardroom of HAKC's Administrative offices located at 3822 Summit, Kansas City, MO 64111. To attend virtually, please visit the website at www.hakc.org/proposed-changes.

Nona C. Eath
Executive Director



Annual PHA Plan (Standard PHAs and Troubled PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 9/30/2027
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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. They also inform 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-, very low-, 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. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) 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, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, 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 HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	PHA Name: _____ PHA Code: _____ PHA Type: ☐ Standard PHA ☐ Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____ Total Combined Units/Vouchers _____ PHA Plan Submission Type: ☐ Annual Submission ☐ Revised Annual Submission Public 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. 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 and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.

(c) The PHA must submit its Deconcentration Policy for Field Office review.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year?

Y N

- | | | |
|--------------------------|--------------------------|--|
| ☐ | ☐ | Choice Neighborhoods Grants. |
| ☐ | ☐ | Modernization or Development. |
| ☐ | ☐ | Demolition and/or Disposition. |
| ☐ | ☐ | Designated Housing for Elderly and/or Disabled Families. |
| ☐ | ☐ | Conversion of Public Housing to Tenant-Based Assistance. |
| ☐ | ☐ | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. |
| ☐ | ☐ | Homeownership Program under Section 32, 9 or 8(Y) |
| ☐ | ☐ | Occupancy by Over-Income Families. |
| ☐ | ☐ | Occupancy by Police Officers. |
| ☐ | ☐ | Non-Smoking Policies. |
| ☐ | ☐ | Project-Based Vouchers. |
| ☐ | ☐ | Units with Approved Vacancies for Modernization. |
| ☐ | ☐ | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

(b) If any of these activities are planned for the applicable 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.

B.3

Progress Report.

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

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☐ (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N ☐ ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

C.2	Certification by State or Local Officials. 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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <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.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☐ (b) If yes, include Challenged Elements.

C.5

Troubled PHA.

(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?

Y N N/A

☐ ☐ ☐

(b) If yes, please describe:

B.1. Revision of Existing PHA Plan Elements: Statement of Housing Needs and Strategy for Addressing Housing Needs

The Housing Authority of Kansas City, Missouri (HAKC) recognizes the continuing need for affordable housing assistance within its jurisdiction. Rising rental costs, limited affordable housing inventory, increasing housing cost burdens, and the growing number of households experiencing homelessness have significantly increased demand for Housing Choice Voucher (HCV) assistance that exceeds available resources and funding.

Particular housing needs exist among extremely low-income households, seniors, persons with disabilities, veterans, families with children, youth transitioning from foster care, and individuals and families experiencing homelessness. Access to affordable housing in areas of opportunity remains a challenge due to limited housing availability, increasing market rents, and landlord participation constraints.

To address these housing needs, HAKC will focus on maximizing voucher utilization, expanding landlord participation, increasing access to housing opportunities throughout the jurisdiction, supporting fair housing and mobility efforts, and strengthening partnerships with community organizations and service providers. HAKC will also dedicate 100 Housing Choice Vouchers to Kansas City's Housing Gateway Program to End Homelessness to assist households experiencing homelessness in obtaining stable, permanent housing.

In addition, HAKC will continue implementation of HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) to ensure assisted families reside in safe and habitable housing and will implement Housing Opportunity Through Modernization Act (HOTMA) requirements to improve program administration and operational efficiency. These efforts are intended to enhance housing stability, improve program integrity, and ensure continued compliance with HUD regulations while addressing the affordable housing needs of low-income families throughout the community.

HAKC's HCV waiting list continues to demonstrate a substantial unmet need for affordable housing assistance. The majority of applicants are extremely low-income households whose housing costs exceed affordability standards. Many applicant households include elderly individuals, persons with disabilities, families with children, and households experiencing housing instability. Due to limited funding availability and high demand for assistance, HAKC remains focused on maximizing program utilization and ensuring available resources are used efficiently to serve eligible families.

De-concentration and Other Policies that Govern Eligibility, Selection, and Admissions

HAKC made updates to the Housing Choice Voucher Administrative Plan that governs eligibility, selection, and Admissions including changes required by Housing Opportunity Through Modernization Act (HOTMA). The implementation date will be effective on January 1, 2027.

Housing Choice Voucher Program Revisions to Administrative Plan

Overview of Changes Administrative Plan

Chapter 3

- Incorporated the definitions of *family*, *foster adult*, and *foster child* to be effective prior to the PHA's general HOTMA 102/104 compliance date as required by Notice PIH 2024-38.

Chapter 5

- This chapter contains only one citation correction.

Chapter 6.A.

- Incorporates HOTMA 102/104 changes required to be implemented by July 1, 2025, per Notice PIH 2024-38. This includes changes regarding:
 - Minors
 - Full-time students and student financial assistance
 - Earned income
 - Business income
 - Periodic payments
 - Nonrecurring income
 - State payments to allow individuals with disabilities to live at home
 - Civil rights settlements
 - Federally mandated and other income exclusions
 - Lump-sum additions to net family assets
 - ABLE accounts
 - Trusts and medical care expenses

Chapter 6.B

- Represents the policies the PHA will use upon the HOTMA 102/104 compliance date. Only minor corrections and clarifications have been made to this chapter.

Chapter 7.A.

- Incorporates HOTMA 102/104 changes required to be implemented by July 1, 2025, per Notice PIH 2024-38. This includes changes regarding:
 - o Student financial assistance
 - o The health and medical care expense deduction.

Chapter 7.B

- Represents the policies the PHA will use upon the HOTMA 102/104 compliance date. This chapter contains no changes since the last revision.

Chapter 8

- NSPIRE-National Standards for the Physical Inspection of Real Estate and Rent Reasonableness Determinations

Chapter 9

- This chapter contains only a minor citation update.

Chapter 10

- Chapter 11.A. contains only one minor chapter number correction.
- Chapter 11.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date. It likewise contains only one minor chapter number correction.

Chapter 12

- Moved the callout to state that a newly added policy on failure to provide consent, rather than the section, is effective upon the PHA's HOTMA 102/104 compliance date.
- Added cross reference to Chapter 16 under policy regarding consideration of circumstances.

Chapter 14

- Revised amount of federal awards required to have an independent audit.
- Revised section on De Minimis Errors to be effective prior to the PHA's general HOTMA 102/104 compliance date as required by Notice PIH 2024-38.

Chapter 15

- Clarified language regarding homeownership assistance expenses.

Chapter 16

- Clarified language regarding informal hearings.
- Added section on Criminal Prosecution for Program Fraud/Abuse to better align with HUD protocols.
- Revised section on General Repayment Agreement Guidelines for Families to better align with HUD protocols.

Chapter 18

- Multiple sections of this chapter have been revised to align with Notice PIH 2025-03, RAD Supplemental Notice 4C.

Chapter 19

- Added New chapter Special Purpose Vouchers and Emergency Housing

Glossary

Removed references to various definitions related to HOTMA 102/104 becoming to be effective upon the compliance date as required by Notice PIH 2024-38.

Appendix

Revised appendix to explicitly call out HOTMA 102/104 policies that are on hold until implementation versus policies that are applicable no later than July 1, 2024, per Notice PIH 2024-38.

Rent Determination

HAKC has made updates to policies related to rent determination related to changes required by HOTMA. Policies governing HAKC's Housing Choice Voucher (HCV) Program are found in HAKC's Administrative Plan. These updates will become effective on January 1, 2027.

B.2. New Activities

Expansion of Project Based Voucher Program

The Housing Authority of Kansas City, Missouri (HAKC) intends to expand the use of Project-Based Vouchers (PBVs) as authorized under Section 8(o)(13) of the United States Housing Act of 1937 and applicable HUD regulations.

The Project-Based Voucher Program allows HAKC to attach rental assistance to specific housing units through long-term Housing Assistance Payments (HAP) contracts with

property owners. The PBV program will be utilized to increase the supply of affordable housing, support new affordable housing development and preservation efforts, promote housing stability, and address the housing needs of low-income families, seniors, persons with disabilities, veterans, and households experiencing homelessness.

HAKC may utilize PBVs in conjunction with local housing development initiatives, redevelopment efforts, supportive housing projects, and the Gateway to End Homelessness initiative. PBV assistance may be targeted to developments that provide access to transportation, employment opportunities, educational resources, healthcare services, and other community amenities.

Expected outcomes include:

- Increased availability of affordable housing units throughout HAKC's jurisdiction.
- Expanded housing opportunities for vulnerable and underserved populations.
- Support for permanent supportive housing and homelessness reduction initiatives.
- Preservation and development of quality affordable housing units.
- Strengthened partnerships with housing developers, property owners, and community stakeholders.
- Increased housing stability and reduced barriers to obtaining affordable housing.

HAKC will administer the PBV program in accordance with HUD regulations, the Administrative Plan, and all applicable fair housing and civil rights requirements.

B.3 Progress Report

As of June 16, 2026, the Housing Authority of Kansas City (HAKC) had a total of 33,519 applicants on the Housing Choice Voucher (HCV) waitlist demonstrating a strong need for affordable housing options in the Housing Authority of Kansas City's jurisdiction.

Policy and Administrative Updates

- HAKC HCV program has implemented the updated Housing Choice Voucher (HCV) Administrative Plan effective May 1, 2026. This update included the new NSPIRE inspection policies and procedures, effective February 1, 2027; along with the Housing Opportunity Through Modernization Act (HOTMA) implementation policies and procedures effective January 1, 2026.
- HAKC HCV accepted 116 Tenant Protection Vouchers to assist displaced tenants find affordable housing.
- HAKC HCV department hired AMA consultants to complete a 100% file review to guide our staff on the corrections that need to be made to each file.
- HAKC HCV department has provided staff training for the following: NSPIRE, HOTMA, HCV Specialists, and additional training with AMA consultants.
- HAKC HCV has conducted Landlord Briefings on a monthly basis to ensure current and new Owners/Landlords are educated on the HCV program.

Housing Choice Voucher (HCV) Goals and Objectives

Goal 1- Housing Opportunity and Homeless Reduction

HAKC will support local and regional efforts to reduce and end homelessness by dedicating 100 Housing Choice Vouchers to the Housing Gateway Program. This program led by the City of Kansas City Housing Program, will attempt to end Homelessness during FY 2027. These vouchers will be targeted to eligible households experiencing homelessness or at imminent risk of homelessness through coordinated referrals from community partners, Continuum of Care, shelters, and supportive service agencies.

Performance Measures

- Make 100 vouchers available for Kansas City's Housing Gateway Program.
- Lease 100 vouchers by September 30, 2027.
- Achieve a housing retention rate of at least 85% among participating households.
- Conduct quarterly program outcome reviews with community partners

Goal 2 - HOTMA Implementation

HAKC will fully implement the requirements of the Housing Opportunity Through Modernization Act (HOTMA) including sections 102 and 104, effective January 1, 2027. The agency will update policies, procedures, forms, software systems, and staff training materials to ensure compliance with HUD regulations governing income determinations, asset calculations, interim reexaminations, and program administration.

Performance Measures

- Continual monitoring the supporting policies for HOTMA implementation.
- Continual staff training of HOTMA requirements.
- Continual updates on forms, notices, and software systems to support HOTMA compliance.
- Conduct quality control reviews to ensure accurate implementation of HOTMA provisions.
- Monitor compliance through monthly supervisory reviews.

Goal 3 - NSPIRE Compliance and Housing Quality Standards

HAKC will continue implementation of HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) inspection protocol to ensure assisted families reside in safe, healthy, and habitable housing. The agency will provide ongoing staff training and landlord education regarding NSPIRE requirements and deficiency correction standards.

Performance Measures

- Conduct inspections in accordance with NSPIRE requirements
- Provide annual NSPIRE training for inspection staff
- Continuing conducting landlord education and outreach regarding NSPIRE standards
- Monitor inspection performance and deficiency correction timelines
- Improve housing quality outcomes and reduce repeat inspection deficiencies

Goal 4 - Administrative Excellence and Program Compliance

HAKC will strengthen internal controls, quality assurance processes, and compliance monitoring activities to improve program administration and maintain compliance with HUD regulations.

Performance Measures

- Complete 100% of annual recertifications timely

- Reduce annual recertification delinquency rate to less than 2% of completed certifications
- Conduct monthly quality control reviews of at least 2% of completed certifications
- Conduct monthly SEMAP compliance monitoring reviews
- Achieve High Performer SEMAP designation
- Monitor payment standard application and jurisdictional zip code compliance monthly

B.4. Conversion of Public Housing to Tenant-Based Assistance.

Properties will be redeveloped using the HUD Section 18 Disposition/Demolition approval process, seeking to exit the properties from the public housing program and transfer to HAKC affiliate control, allowing for development activity including redevelopment, substantial rehabilitation, and modernization using non-traditional resources.

HAKC may use any or all of the available HUD authorized programs for redevelopment, including Section 18 disposition, Low-Income Housing Tax Credits (“LIHTC”), Rental Assistance Demonstrations (“RAD”), and any other available resource that aids in the conversion of public housing to other, more sustainable uses.

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

The Housing Authority of Kansas City (HAKC) administers its Public Housing program in accordance with HUD regulations and the policies outlined in its Admissions and Continued Occupancy Policy (ACOP). HAKC is committed to providing equal housing opportunities and ensuring that admissions are conducted in a fair, consistent, and nondiscriminatory manner.

HAKC maintains a centralized waiting list for public housing and selects applicants based on established eligibility criteria, local preferences, unit size requirements, and the date and time of application. Eligibility is determined through verification of income, family composition, citizenship or eligible immigration status, criminal background screening, and other factors required by HUD regulations.

In accordance with HUD's deconcentration requirements, HAKC monitors occupancy patterns and tenant characteristics across its developments to ensure that families are not concentrated in any one development based on income level. HAKC takes affirmative steps to promote income mixing and provide eligible families with access to housing opportunities throughout its portfolio. Applicants are offered housing in accordance with the Authority's occupancy standards and unit availability.

HAKC complies with all applicable federal civil rights laws, including the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act (ADA), and HUD's Equal Access Rule. Reasonable accommodations are provided to applicants and residents with disabilities to ensure equal access to housing programs and services.

The Authority conducts outreach to underserved populations and maintains policies designed to ensure broad access to housing opportunities. Admissions policies and local preferences are reviewed periodically to ensure compliance with HUD regulations and to support the Authority's mission of providing safe, decent, and affordable housing to eligible families.

HAKC's admissions and occupancy policies are detailed in the revised ACOP, which is available for public review and became effective June 1, 2026. The Summary of changes are attached

Attachment: Deconcentration Policy and Analysis

The Housing Authority of Kansas City, Missouri (HAKC) is committed to promoting income diversity and reducing the geographic concentration of poverty in its public housing communities. This aligns with HUD's requirements under 24 CFR Part 903 and supports HAKC's mission to foster inclusive and economically vibrant neighborhoods.

Methodology

1. HAKC annually determines the average income of all families in covered developments.
2. HAKC calculates the average income for each covered development, without adjustment for unit size.
3. HAKC compares each development's average income to the Established Income Range (EIR), defined as 85% to 115% of the overall average.
4. HAKC identifies developments above or below the EIR and evaluates them for consistency with strategic goals.
5. If needed, HAKC applies strategies to address deconcentration and income-mixing, such as:
 - a. Targeting working families for lower-income sites and scattered sites
 - b. Encouraging higher-income families through marketing, amenities, and community investment
 - c. Supporting current households in raising income through employment services
 - d. Using transfer offers and Scattered Sites allocations strategically

Strategies for Below-Range Developments (<85%)

1. Increase income via resident services, job training, and financial literacy
2. Leverage RAD and capital funds for modernization to attract diverse households
3. Collaborate with economic mobility partners (e.g., FSS, ROSS, Choice Neighborhoods)

Strategies for Above-Range Developments (>115%)

1. Maintain balanced occupancy through admissions planning and transfer opportunities
2. Monitor to avoid unintentional exclusion of lower-income applicants
3. Ensure fair access via affirmative marketing and tenant protections

Attachment B.1- (1) Financial Resources

The table below summarizes the anticipated financial resources available to the Housing Authority of Kansas City, Missouri (HAKC) for Fiscal Year 2027, along with the intended uses of those funds.

Housing Authority of Kansas City Missouri		
Financial Resources		
Sources	Estimated Funding FY 2027	Planned Use
<i>Public Housing Program Resources</i>		
Operating Fund	6,950,000	Public Housing Operations
FY 2027 Capital Fund (65%)	3,317,542	Public Housing Capital Improvements
FY 2027 Capital Fund (35%)	1,786,369	Public Housing Operations
Subtotal - 2027 Grants	12,053,910	
Rental Income	5,390,000	
Other Income		
Non-dwelling	105,000	Public Housing Operations
Other Tenant Charges	220,000	Public Housing Operations
Choice Endowment Fund	386,000	Case management services to promote self sufficiency
Evergy Grant	380,000	Electric Utility assistance for clients from the wait list
COMBAT Grant	49,485	Services to prevent substance use disorders or violent crime
Subtotal - Other Income	1,140,485	
Public Housing Resources - Prior Year Grants		
2026 Capital Grant	3,318,000.00	Public Housing Capital Improvements
2025 Capital Grant	250,000.00	Public Housing Capital Improvements
ROSS Grant	158,300	Hire and maintain Service Coordinators
Subtotal - Prior Year Grants	408,300	
Total Resources - Public Housing	18,992,695	
<i>Section 8 Program Resources</i>		
Housing Assistance Payment - HCVP	73,200,000	Payments to Landlords
Administrative Fee - HCVP	5,600,000	Program Administrative fee
Family Self Sufficiency Program Grant	336,480	Self Sufficiency activities - Service Coordinators
Family Self Sufficiency Program Forfeitures	565,000	Self Sufficiency activities
Total Resources for Section 8 Program	79,701,480	
Total Resources	98,694,175	

Attachment B.1 - (4) Rent Determination

HAKC has made updates to policies related to rent determination related to changes required by HOTMA. Policies governing HAKC's Housing Choice Voucher (HCV) Program are found in HAKC's Administrative Plan. These updates will become effective on January 1, 2027.

- Chapter 6 Income & Rent Determinations (HOTMA 102/104)
- Policy Topic Current Language Proposed Language Reason for Change
- Governing Based on pre-HOTMA rules; Explicitly governed by Federal statutory
- Policy Topic Current Language Proposed Language Reason for Change
- Authority anticipated income methodology (pp. 6-1–6-2) HOTMA 102 & 104 and Notice PIH 2023-27 (Intro; 6-I) requirement
- Definition of:
 - **Annual Income:** Income includes all amounts unless excluded (pp. 6-3–6-4) Income defined primarily by statutory exclusions list (6-I.A) HOTMA redefined income methodology
 - **Anticipated vs. Prior-Year Income:** Uses anticipated income for most households (pp. 6-1–6-3) Requires prior-year income with limited exceptions (6-I.C) HOTMA mandate
 - **Earned Income Disallowance (EID):** Fully available to eligible families; detailed tracking required (pp. 6-4–6-8) Closed to new families; sunset language included (6-I.E) HOTMA repealed EID
 - **Zero Income/Extremely Low Income:** Mandatory 90-day interims and credit checks (pp. 6-8–6-9) Eliminated special 90-day reviews (6-I.I) HUD discourages excessive burden
 - **Interim Reexams:** – Income Increases Dollar-based thresholds; frequent interims (pp. 6-9–6-11) 10% adjusted-income threshold; earned-income increases excluded (6-III.C) HOTMA prohibits dollar thresholds
 - **Non-Recurring Income:** Narrow definition; some counted as income (pp. 6-9–6-11) Expanded list of excluded non-recurring income (6-I.I) HOTMA exclusions
 - **Student Financial Assistance:** Most aid counted as income unless excluded (pp. 6-3–6-4) Cost-based calculation model adopted (6-I.G) HOTMA statutory change

- **Assets:** Threshold Imputed income applies at \$5,000 (pp. 6-12–6-13) HUD-published threshold (~\$50,000+) adopted (6-II.C–D) HOTMA asset simplification
- **Self-Certification of Assets:** Not permitted Allowed below HUD asset threshold (6-II.D) HOTMA burden reduction
- **Assets Disposed Below FMV Two-year look-back:** \$4,000 threshold (p. 6-12) Retained but aligned with HOTMA asset rules (6-II.E) Conforming change
- **Regular Contributions & Gifts:** Counted if received every two months or more (p. 6-9) Clarified; non-recurring assistance excluded (6-I.I) HOTMA clarification
- **Lump-Sum Payments:** Retroactive vs. prospective calculations detailed (pp. 6-10–6-11) Simplified treatment consistent with HOTMA exclusions (6-I.I) Streamlining
- **Medical Expense Deduction:** Based largely on prior year expenses (pp. 6-14–6-15) Emphasizes anticipated expenses (6-III.D) HUD guidance update
- **Adjusted Income Deductions:** Fixed dollar amounts listed (pp. 6-3–6-4) References HUD-indexed amounts (6-III.A–C) HOTMA inflation indexing
- **Flat Rent:** Choice Addressed extensively in Ch. 6 (pp. 6-18–6-23) Integrated with HOTMA rent methodology and over-income rules (6-IV) HOTMA over-income requirements.
- **Over-Income:** Not addressed 12- and 24-month over-income HOTMA statutory

Attachment B.1-(5) Operations and Management

Asset Management

The Housing Authority of Kansas City, Missouri (“HAKC”) will be transitioning its property management operations to an asset management-based structure. This change will focus on asset level operational decision-making, including asset level financial management, capital management, waitlist, maintenance and property management.

This change will ensure that each property/asset is able to sustain itself and perform without the support of other assets. Additionally, this change will help provide HAKC with critical information about each asset to inform capital, redevelopment, management, and other operational changes with real-time performance metrics.

This element has been updated to reflect current information relating to the HAKC Public Housing and HCV waiting lists. As of June 20, 2026, there were a total of 15,657 applicants on the Public Housing waiting list. Approximately 93.95% of those applicants (13,650) qualify as extremely low-income families.

Low Income Public Housing Waiting List						
Family Size	1	2	3	4	5	Total
Total Number of Applicants	14,335	1,160	56	23	26	15,657
Percent of Total	92%	7.4%	.4%	0.053%	0.01%	100%

Attachment B.1 - (6) Homeownership Programs

Homeownership

The homeownership option is used to assist one or more eligible adult members of a family in purchasing a home. Housing Choice Voucher assistance will take the form of monthly homeownership assistance payments. HAKC will not impose any requirement for the recapture of homeownership assistance upon the sale or refinancing of a home purchased through the Program.

HAKC will limit the number of participants in the Program at any given time to ensure the effectiveness of case management. When positions in the program become available HAKC will admit clients into the program as they were placed on a chronological waiting list.

Active Strategies

- Engage to income-eligible families according to requirements of the plan.
- Establish relationships with real estate professionals to facilitate the marketing and sale of homes to income-eligible purchasers.
- Use a variety of federal and non-federal funding sources to assist with affordable and mixed income single family housing.
- Seek effective partnerships with organizations to provide support, funding, and other resources for an effective homeownership program.
- HAKC will promote new homeownership by doing quarterly home ownership orientations and promoting financial literacy classes.
- The family must attend, and satisfactorily complete homeownership counseling conducted by a HAKC approved housing counseling agency prior to receiving homeownership assistance through HAKC. Such counseling shall be consistent with HUD-approved housing counseling.
- HAKC will provide written notice to the family when it has successfully met all the requirements of the Program including completion of homeownership training and financial counseling and is eligible to receive HCV homeownership assistance and ready to purchase a home

Attachment B.1 - (7): Safety and Crime Prevention

Public Housing Authority Safety and Crime Prevention Plan

1. Plan for Safety and Crime Prevention

The Housing Authority of Kansas City (HAKC) has established a Public Safety Department (PSD) to ensure the safety and well-being of all public housing residents.

Roles of the Public Safety Department:

- Officers actively patrol all HAKC properties.
- Enforce housing policies and document violations.
- Address environmental concerns such as trash and blight.
- Investigate complaints and respond promptly to disturbances.
- Host monthly tenant meetings to discuss safety issues, provide updates, and gather resident input.

Proactive Crime Prevention:

- PSD officers and development managers conduct monthly meetings to foster direct communication with tenants.
- These meetings promote community involvement, share ideas on crime prevention, and plan outreach events.
- The PSD tracks crime trends to develop and implement proactive programs that reduce crime and the associated fear among residents.

2. Safety Needs and Crime Prevention Activities

Need for Safety Measures:

Public housing residents face challenges such as crime and safety concerns that threaten their peace of mind and well-being. Ensuring their safety is a priority to promote a secure living environment and improve quality of life.

Crime Prevention Activities:

- Regular patrolling of properties by PSD officers.
- Monthly tenant meetings aimed at safety discussion and awareness.
- Environmental upkeep to reduce blight, which can foster criminal activity.
- Coordination with local law enforcement for investigations and follow-ups.
- Accountability measures, including banning individuals who violate safety policies.

3. Coordination with Police

The Kansas City Police Department (KCPD) assigns a dedicated officer as a liaison to work closely with the PSD.

- This liaison tracks crime and police response on public housing properties.
- The liaison and PSD collaborate on investigations and tenant interviews related to criminal activities.
- This partnership strengthens law enforcement presence and response efficiency, ensuring a safer community.

4. Support and Services for Victims of Domestic Violence, Sexual Assault, and Stalking

External Agency Partnerships:

HAKC works with several organizations to support victims, including:

- Rose Brooks Domestic Violence Shelter.
- Metropolitan Organization to Combat Sexual Assault.
- Samuel Rogers Health Center.
- Swope Mental Health.

These partnerships provide training, counseling, shelter, and medical services.

Internal Support Within HAKC:

- The PSD collaborates with Resident Services to connect victims to necessary resources.
- Officers are trained to recognize and support victims of domestic violence and related crimes.
- A curriculum and PowerPoint presentation on domestic violence prevention and resources will be developed for monthly tenant meetings.
- The training will cover recognizing abuse, steps for seeking help, available resources, and HAKC's response procedures.

5. Programs to Maintain Housing Stability and Enhance Victim Safety

- PSD officers receive specialized training to handle domestic violence cases sensitively and effectively.
- The Public Safety Department offers victim counseling and referrals.
- HAKC's programs aim to prevent domestic violence and support victim safety within assisted families, complying with VAWA standards.

This plan ensures a comprehensive approach to safety, crime prevention, and victim support, fostering a secure and supportive environment for all residents of HAKC public housing.

Attachment B.1-(8) Pet Policy

The Housing Authority of Kansas City (HAKC) permits residents of public housing developments to own and keep common household pets in accordance with HUD regulations and the Housing Authority of Kansas City's Admissions and Continued Occupancy Policy (ACOP). The pet policy is designed to balance residents' enjoyment of pet ownership with the health, safety, and peaceful enjoyment of the community by all residents.

Residents who wish to keep a pet must comply with all requirements established by HAKC, including registration of the pet, adherence to local animal control ordinances, and maintenance of the pet in a manner that does not create a nuisance, threat to health or safety, or damage to Authority property. Residents may be required to provide documentation regarding vaccinations, licensing, and other information as specified in the ACOP.

HAKC has established reasonable limitations regarding the number, size, and type of pets permitted within public housing units. Residents are responsible for the care and supervision of their pets at all times and for any damage caused by their pets. Failure to comply with the pet policy may result in corrective action as outlined in the lease and ACOP.

Service animals and assistance animals that provide support to individuals with disabilities are not considered pets and are permitted in accordance with federal fair housing and disability laws. HAKC provides reasonable accommodations to qualified individuals with disabilities who require assistance animals.

HAKC periodically reviews its pet policies to ensure compliance with HUD requirements and to promote a safe, sanitary, and enjoyable living environment for all residents.

Attachment B.1-(9) Asset Management

The Housing Authority of Kansas City, Missouri (“HAKC”) will be transitioning its property management operations to an asset management-based structure. This change will focus on asset level operational decision-making, including asset level financial management, capital management, waitlist, maintenance and property management.

This change will ensure that each property/asset is able to sustain itself and perform without the support of other assets. Additionally, this change will help provide HAKC with critical information about each asset to inform capital, redevelopment, management, and other operational changes with real-time performance metrics.

B.1 - (c) Plan Elements

Attachment C– Deconcentration Policy and Analysis

The Housing Authority of Kansas City, Missouri (HAKC) is committed to promoting income diversity and reducing the geographic concentration of poverty in its public housing communities. This aligns with HUD’s requirements under 24 CFR Part 903 and supports HAKC’s mission to foster inclusive and economically vibrant neighborhoods.

Methodology

1. HAKC annually determines the average income of all families in covered developments.
2. HAKC calculates the average income for each covered development, without adjustment for unit size.
3. HAKC compares each development’s average income to the Established Income Range (EIR), defined as 85% to 115% of the overall average.
4. HAKC identifies developments above or below the EIR and evaluates them for consistency with strategic goals.
5. If needed, HAKC applies strategies to address deconcentration and income-mixing, such as:
 - a. Targeting working families for lower-income sites and scattered sites
 - b. Encouraging higher-income families through marketing, amenities, and community investment
 - c. Supporting current households in raising income through employment services
 - d. Using transfer offers and Scattered Sites allocations strategically

Strategies for Below-Range Developments (<85%)

- Increase income via resident services, job training, and financial literacy
- Leverage RAD and capital funds for modernization to attract diverse households
- Collaborate with economic mobility partners (e.g., FSS, ROSS, Choice Neighborhoods)

Strategies for Above-Range Developments (>115%)

- Maintain balanced occupancy through admissions planning and transfer opportunities
- Monitor to avoid unintentional exclusion of lower-income applicants
- Ensure fair access via affirmative marketing and tenant protections

Attachment B.2-(1) Modernization or Development.

Modernization and Development

The Housing Authority of Kansas City, Missouri (“HAKC”) is embarking on a multi-year redevelopment effort intended to replace all of the units currently under its authority. This effort is part of a Board approved development plan, which outlines the properties to be redeveloped, their conversion strategy, and their end use post redevelopment. The properties planned for redevelopment include:

- Brush Creek Towers (MO002000013 – all units)
- Dunbar Gardens (MO002000014 – all units)
- Theron B. Watkins Apartments (MO002000006 – all units)
- Pemberton Heights (MO002000025 – all units)
- Guinotte Manor (MO002000003 – all units)
- West Bluff (MO002000008 – all units)
- Riverview Gardens (MO002000033 – all units)
- Scattered Sites (various – all units)
- Properties will be redeveloped using the HUD Section 18 Disposition/Demolition approval process, seeking to exit the properties from the public housing program and transfer to HAKC affiliate control, allowing for development activity including redevelopment, substantial rehabilitation, and modernization using non-traditional resources.
- HAKC may use any or all of the available HUD authorized programs for redevelopment, including Section 18 disposition, Low-Income Housing Tax Credits (“LIHTC”), Rental Assistance Demonstrations (“RAD”), and any other available resource that aids in the conversion of public housing to other, more sustainable uses.

Attachment B.2 (2) Demolition/Disposition Activities

HAKC continues to explore and implement Section 18 Disposition strategies for aging and obsolete public housing units that are no longer cost-effective to maintain. In FY 2027, HAKC will continue its planned disposition schedule, seeking approval to dispose of several existing low-income public housing (“LIPH”) properties and potentially demolish identified units, in conjunction with redevelopment planning. Additionally, HAKC intends to transition up to 100% of its existing scattered site public housing units via a disposition activity due to the combination of obsolescence and the unsustainability of the operation of the units. HAKC may also utilize Section 18 dispositions as a means to transition existing housing sites and properties to HAKC non-profit entities and partners as a function of the redevelopment of the site. Properties planned to be impacted include:

1. Brush Creek Towers (135 Units)
2. West Bluff (100 Units)
3. Pemberton Heights (120 Units)
4. Dunbar Gardens (65 Units)
5. Riverview Gardens (232 Units)
6. Theron B. Watkins Homes (210 Units)
7. Guinotte Manor (219 Units)
8. Scattered Sites (430 Units)

Attachment B.2 - (3): Conversion of Public Housing to Tenant-Based Assistance.

Properties will be redeveloped using the HUD Section 18 Disposition/Demolition approval process, seeking to exit the properties from the public housing program and transfer to HAKC affiliate control, allowing for development activity including redevelopment, substantial rehabilitation, and modernization using non-traditional resources.

HAKC may use any or all of the available HUD authorized programs for redevelopment, including Section 18 disposition, Low-Income Housing Tax Credits ("LIHTC"), Rental Assistance Demonstrations ("RAD"), and any other available resource that aids in the conversion of public housing to other, more sustainable uses.

Attachment B.2 - (4): Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.

Properties will be redeveloped using the HUD Section 18 Disposition/Demolition approval process, seeking to exit the properties from the public housing program and transfer to HAKC affiliate control, allowing for development activity including redevelopment, substantial rehabilitation, and modernization using non-traditional resources.

HAKC may use any or all of the available HUD authorized programs for redevelopment, including Section 18 disposition, Low-Income Housing Tax Credits (“LIHTC”), Rental Assistance Demonstrations (“RAD”), and any other available resource that aids in the conversion of public housing to other, more sustainable uses.

Attachment B.2-(5) Homeownership Program

Homeownership

The homeownership option is used to assist one or more eligible adult members of a family in purchasing a home. Housing Choice Voucher assistance will take the form of monthly homeownership assistance payments. HAKC will not impose any requirement for the recapture of homeownership assistance upon the sale or refinancing of a home purchased through the Program.

HAKC will limit the number of participants in the Program at any given time to ensure the effectiveness of case management. When positions in the program become available HAKC will admit clients into the program as they were placed on a chronological waiting list.

Active Strategies

- Engage to income-eligible families according to requirements of the plan.
- Establish relationships with real estate professionals to facilitate the marketing and sale of homes to income-eligible purchasers.
- Use a variety of federal and non-federal funding sources to assist with affordable and mixed income single family housing.
- Seek effective partnerships with organizations to provide support, funding, and other resources for an effective homeownership program.
- HAKC will promote new homeownership by doing quarterly home ownership orientations and promoting financial literacy classes.
- The family must attend, and satisfactorily complete homeownership counseling conducted by a HAKC approved housing counseling agency prior to receiving homeownership assistance through HAKC. Such counseling shall be consistent with HUD-approved housing counseling.
- HAKC will provide written notice to the family when it has successfully met all the requirements of the Program including completion of homeownership training and financial counseling and is eligible to receive HCV homeownership assistance and ready to purchase a home

Attachment B.2-(6) Occupancy By Police Officers

Attachment B.2-(7) Use of Project Based Vouchers

The Housing Authority of Kansas City, Missouri (“HAKC”) intends to use project-based vouchers (“PBV”) in accordance with HUD regulations, particularly those set forth in PIH-Notice 2017-21. As such, HAKC will issue a competitive request for proposals where required to do so, selecting projects in accordance with HAKC policy, HUD regulation, and HAKC long-term planning. Information in this section of the Annual Plan supersedes and replaces any information previously submitted related to the use of PBVs, project caps, competitive procurements, and

Per the regulatory changes set forth in PIH Notice 2017-21, HAKC will not perform competitive procurements for awards of PBV to projects that meet the definition of “owned by a PHA”, as defined in section 105 of HOTMA and as stated in Attachment A: PHA Owned Units, subsection 1 and further defined in Attachment A, Section 2.

HAKC will also seek to exceed the previously held statutory limit on units that can be awarded as PBV, in accordance with the regulations set in PIH Notice 2017-21, particularly the regulatory changes set forth in Attachment E: Income-Mixing Requirements (Project Cap) and Attachment F: Units Not Subject to Percentage Limitation (Program Cap) or Income-Mixing Requirement (Project Cap). HAKC will seek to maximize the number of units placed under a PBV contract in all developments but especially those developed as part of their replacement housing plans.

HAKC will also use the additional 10% in eligible percentage limitation increasing its PBV limit from 20% to 30%, through the development of housing targeted for persons meeting one or several of the HUD eligible categories as listed in Attachment D: PBV Percentage Limitations – 10 Percent Increase for Eligible Units.

Section 18 Demolition/Disposition Activities

HAKC continues to explore and implement Section 18 Disposition strategies for aging and obsolete public housing units that are no longer cost-effective to maintain. In FY 2027, HAKC will continue its planned disposition schedule, seeking approval to dispose of several existing low-income public housing (“LIPH”) properties and potentially demolish identified units, in conjunction with redevelopment planning. Additionally, HAKC intends to transition up to 100% of its existing scattered site public housing units via a disposition activity due to the combination of obsolescence and the unsustainability of the operation of the units. HAKC may also utilize Section 18 dispositions as a means to transition existing housing sites and properties to HAKC non-profit entities and partners as a function of the redevelopment of the site. Properties planned to be impacted include:

1. Brush Creek Towers (135 Units)
2. West Bluff (100 Units)
3. Pemberton Heights (120 Units)
4. Dunbar Gardens (65 Units)
5. Riverview Gardens (232 Units)
6. Theron B. Watkins Homes (210 Units)
7. Guinotte Manor (219 Units)
8. Scattered Sites (430 Units)

Units Approved for Modernization Activities

The Housing Authority of Kansas City, Missouri has developed a comprehensive Five Year Action Plan to address critical physical needs, operational support, and modernization across all developments.

Year 1 (2027) prioritizes infrastructure upgrades, including electrical panel replacements at Riverview and Brush Creek Towers, further HVAC modernization, plumbing repairs at Pemberton Heights, and scattered site foundation and retaining wall repairs. Authority-wide, service vehicles will be acquired to enhance project oversight.

Year 2 (2028) launches major exterior projects, including siding and wood rot repairs at Guinotte Manor, enhanced site security, and elevator engineering assessments at Brush Creek Towers. Flooring and common-area upgrades continue across all developments.

Year 3 (2029) builds on prior work with large-scale modernization at Theron B. Watkins, infrastructure repairs at Riverview, and unit upgrades at Pemberton Heights and scattered sites.

Year 4 (2030) completes modernization cycles with final HVAC, exterior, and structural improvements, particularly at Theron B. Watkins, Guinotte Manor, and Pemberton Heights, ensuring sustainable and improved living conditions.

Across all years, common initiatives include acquisition and modernization of IT hardware and infrastructure, operations support, flooring replacements, staff training, resident engagement, and routine audits. Investments focus on extending the useful life of housing assets, improving safety and accessibility, and enhancing resident quality of life.

HUD Approved Vacancies: The Housing Authority of Kansas City will identify units that meet the need under 24 CFR 990.145 for HUD Approved Vacancy and capital funds to perform necessary repairs and upgrades to maintain quality safe housing for tenants and modernize units as needed. This practice may apply to all LIPH units at any time during the plan period.

Other Capital Grant Programs: The Housing Authority will continue to assess capital needs and budgetary restraints to identify other grant programs to address aging infrastructure. This includes but is not limited to annual Safety and Security grant funding and applicable waivers to allow additional funds to be allocated to 1406 Operations funding for anticrime and antidrug activities.

Attachment B.2-(8) Project-Based Vouchers

The Housing Authority of Kansas City, Missouri (“HAKC”) intends to use project-based vouchers (“PBV”) in accordance with HUD regulations, particularly those set forth in PIH-Notice 2017-21. As such, HAKC will issue a competitive request for proposals where required to do so, selecting projects in accordance with HAKC policy, HUD regulation, and HAKC long-term planning. Information in this section of the Annual Plan supersedes and replaces any information previously submitted related to the use of PBVs, project caps, competitive procurements, and

Per the regulatory changes set forth in PIH Notice 2017-21, HAKC will not perform competitive procurements for awards of PBV to projects that meet the definition of “owned by a PHA”, as defined in section 105 of HOTMA and as stated in Attachment A: PHA Owned Units, subsection 1 and further defined in Attachment A, Section 2.

HAKC will also seek to exceed the previously held statutory limit on units that can be awarded as PBV, in accordance with the regulations set in PIH Notice 2017-21, particularly the regulatory changes set forth in Attachment E: Income-Mixing Requirements (Project Cap) and Attachment F: Units Not Subject to Percentage Limitation (Program Cap) or Income-Mixing Requirement (Project Cap). HAKC will seek to maximize the number of units placed under a PBV contract in all developments but especially those developed as part of their replacement housing plans.

HAKC will also use the additional 10% in eligible percentage limitation increasing its PBV limit from 20% to 30%, through the development of housing targeted for persons meeting one or several of the HUD eligible categories as listed in Attachment D: PBV Percentage Limitations – 10 Percent Increase for Eligible Units.

Attachment B.2-(9) Units Approved for Modernization Activities

The Housing Authority of Kansas City, Missouri has developed a comprehensive Five-Year Action Plan to address critical physical needs, operational support, and modernization across all developments.

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Across all years, common initiatives include acquisition and modernization of IT hardware and infrastructure, operations support, flooring replacements, staff training, resident engagement, and routine audits. Investments focus on extending the useful life of housing assets, improving safety and accessibility, and enhancing resident quality of life.

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Attachment B.2-(10) Other Capital Grant Programs

Other Capital Grant Programs: The Housing Authority will continue to assess capital needs and budgetary restraints to identify other grant programs to address aging infrastructure. This includes but is not limited to annual Safety and Security grant funding and applicable waivers to allow additional funds to be allocated to 1406 Operations funding for anticrime and antidrug activities.