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 <u>do not</u> 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 <u>both</u> 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
 PHA Name: __Mobile Housing Authority______
 PHA Code: __AL002

 PHA Type: □ Standard PHA ⊠ Troubled PHA
 PHA Plan for Fiscal Year Beginning: (MM/YYYY): __01/2025
 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)

 Number of Public Housing (PH) Units __1052____ Number of Housing Choice Vouchers (HCVs) __4659____ Total Combined
 Units/Vouchers _5711______

 PHA Plan Submission Type: ⊠ Annual Submission
 □Revised Annual Submission

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.

- Mobile Housing Authority's Central Office located at 151 South Claiborne Street, Mobile, AL 36602, by appointment only during the hours of 10:00 a.m. 3:00 p.m.
- Mobile Housing Authority's Management Office locations by appointment only during hours of 10:00 a.m. 3:00 p.m.:
 - Central Plaza Towers, 300 Bayshore Avenue, Mobile, AL 36607
 - o Downtown Renaissance, 350 Bloodgood Street, Mobile, AL 36603
 - o Emerson Gardens, 759 Palmetto Street, Mobile, AL 36603
 - o Oaklawn Homes, 1010 Baltimore Street, Mobile, AL 36605
 - o Renaissance Corridor Communities, 600 N. Joachim Street, Mobile, AL 36603
 - o Gulf Village Homes, 2002 Ball Avenue, Prichard, AL 36610
 - Housing Choice Voucher, 110 Beauregard Street, Suite 106 Mobile, AL 36602
- Mobile Housing Authority website at mobilehousing.org

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

	Participating PHAs	PHA Code Program(s) in the Consortia	Program(s) not in the	No. of Units in Each Program					
				Consortia	PH	HCV			
	Lead PHA:								
B.	Plan Elements								
р.									
B.1	Revision of Existing PHA P	lan Elements.							
	(a) Have the following PHA	Plan elements b	een revised by the PHA?						
	Y N \square \square Statement of Housing	a Nooda and Stra	tegy for Addressing Housing Needs						
	Deconcentration and	Other Policies th	hat Govern Eligibility, Selection, an						
	Image: State								
	Departion and Management.								
	□ ⊠ Grievance Procedures. □ ⊠ Homeownership Programs.								
	Community Service and Self-Sufficiency Programs.								
	Safety and Crime Prevention. Pet Policy.								
	Asset Management.								
	\square \square Substantial Deviation								
	(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):								
	See 2025 Plan Attachment Section B.1								
	(c) The PHA must submit its	Deconcentration	n Policy for Field Office review.						
			See 2025 Plan Attachme	nt Section B 1					
			See 2023 I fan Attachine	nt Section D.1					

B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N □ Hope VI or Choice Neighborhoods. □ Mixed Finance 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. □ 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 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.
	See 2025 Plan Attachment Section B.2
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.
	See 2025 Plan Attachment Section B.3
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.
	Mobile Housing Authority's 5 Year Action Plan was approved by HUD on 10/26/23.
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	$\begin{array}{c} Y & N \\ \hline \end{array} \end{array}$
	(b) If yes, please describe: Please see description in 2025 Plan Attachment Section B.5
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 D
	(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, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

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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, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, 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
	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:
	Please see description in 2025 Plan Attachment Section C.5
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

Describe fair housing strategies and actions to achieve the goa

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

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

□ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR \$903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR \$903.7(a)(2)(i))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's product to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (<u>24 CFR §903.7(c)</u>)

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (<u>24 CFR §903.7(e)</u>)

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(1)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(1))

□ Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, ervices, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, ervices, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan_For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

HOPE VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2**) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: <u>Notice PIH 2012-32 REV-3</u>, successor RAD Implementation Notices, and other RAD notices.

□ Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family role to vacate the unit when the unit is needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

Cccupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

□ Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (<u>24 CFR §903.7(b)</u>).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

Dther Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

- **B.3** Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
- **B.4** Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

- C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.2 Certification by State of Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).
- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
- C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own 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 maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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



2025 Annual Plan Attachment Section Narratives



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2025 HUD-50075-ST Annual Plan Response Narratives

Section A. PHA Information

All Section A items are answered in the template form itself.

Section B. Annual Plan Elements

B.1 Revision of PHA Plan Elements

- (a) See Template
- (b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

B.1.b (1) Statement of Housing Needs and Strategy for Addressing Housing Needs

. Housing Needs of Families on the ate the housing needs of the families on the PHA's v	-	•		
ide waiting list administered by the PHA. PHAs may ts at their option.	provide separate tables for site-ba	ased or sub-jurisdictional public housi	ng waiting	
*	using Needs of Families on	the Waiting List		
Waiting List Type: (select one)				
Section 8 tenant-based assistance				
Y Public Housing				
Combined Section 8 and Public House	ng			
Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing If used, identify which development/sub-jurisdiction:				
	# of families	% of total families	Annual Turnover	
Waiting list total	1127			
Extremely low income <=30% AMI	221	19.6%		
Very low income (>30% but <=50% AMI)	37	3.3%		
Low income (>50% but <80% AMI)	9	0.8%		
Families with children	677	60.1%		
Elderly families	51	4.5%		
Families with Disabilities	195	17.3%		
Race/ethnicity (White)	170	15.1%		
Race/ethnicity (Black)	967	85.8%		
Race/ethnicity (Asian/Other)	49	4.4%		
Race/ethnicity (Hispanic)	27	2.4%		
Characteristics by Bedroom Size (PH Only)				
1 BR	407	36.1%		
2 BR	554	49.2%		
3 BR	166	14.7%		
4 BR	0	0.0%		
5 BR	0	0.0%		
5+ BR	0	0.0%		
the waiting list closed (select one)? fow long has it been closed (# of 1 nonths)?	No X Yes	If yes: Closed on 05/	10/2024	
e	PHA Plan year?	No	Yes	

Housing Needs of Families on th	-	-		
te the housing needs of the families on the PHA's w le waiting list administered by the PHA. PHAs may s at their option.			ng waiting	
Housing Needs of Families on the Waiting List				
Waiting List Type: (select one)				
Section 8 tenant-based assistance X Public Housing				
Public Housing Site-Based or sub-juri If used, identify which development/s	sdictional waiting list (option	nal)Housing		
If used, identify which development's				
	# of families	% of total families	Annual Turnover	
Waiting list total	1202			
Extremely low income <=30% AMI	533	44.3%		
Very low income (>30% but <=50% AMI)	86	7.2%		
Low income (>50% but <80% AMI)	21	1.7%		
Families with children	671	55.8%		
Elderly families	56	4.7%		
Families with Disabilities	199	16.6%		
Race/ethnicity (White)	109	9.1%		
Race/ethnicity (Black)	1099	91.4%		
Race/ethnicity (Asian/Other)	42	3.5%		
Race/ethnicity (Hispanic)	18	1.5%		
Characteristics by Bedroom Size (PH Only)				
1 BR	532	44.3%		
2 BR	292	24.3%		
3 BR	378	31.5%		
4 BR	0	0.0%		
5 BR	0	0.0%		
5+ BR	0	0.0%		
the waiting list closed (select one)?	No X Yes	If yes: Closed on 08/	01/2023	
w long has it been closed (# of 1 onths)?	0			
es the PHA expect to reopen the list in the	PHA Plan year?	No	Yes	

Waitlist: AMP06WL

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHAwide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

Section 8 tenant-based assistance

X Public Housing

Combined Section 8 and Public Housing

Public Housing Site-I	Based or sub-jurisdictional	waiting list (optiona	l)Housing
-----------------------	-----------------------------	-----------------------	-----------

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover		
Waiting list total	1199				
Extremely low income <=30% AMI	139	11.6%			
Very low income (>30% but <=50% AMI)	22	1.8%			
Low income (>50% but <80% AMI)	5	0.4%			
Families with children	741	61.8%			
Elderly families	55	4.6%			
Families with Disabilities	188	15.7%			
Race/ethnicity (White)	166	13.8%			
Race/ethnicity (Black)	1050	87.6%			
Race/ethnicity (Asian/Other)	54	4.5%			
Race/ethnicity (Hispanic)	33	2.8%			
Characteristics by Bedroom Size (PH Only)					
1 BR	426	35.5%			
2 BR	410	34.2%			
3 BR	363	30.3%			
4 BR	0	0.0%			
5 BR	0	0.0%			
5+ BR	0	0.0%			
Is the waiting list closed (select one)?	No X Yes	If yes: Closed on 05/	/10/2024		
How long has it been closed (# of nontheless of the second					
Does the PHA expect to reopen the list in the F	Does the PHA expect to reopen the list in the PHA Plan year? No Yes				
Does the PHA permit specific categories of far	Does the PHA permit specific categories of families onto the waiting list, even if				
generally closed? No	Yes				

Waitlist: A	MP12WI	

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHAwide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

Section 8 tenant-based assistance

× Public Housing

Combined Section 8 and Public Housing

Public Housing Site-Based or sub-jurisdictional waiting list (option	Pu	blic Housing	Site-Based	or sub-jurisdictional	waiting list (o	ptional)Housing
--	----	--------------	------------	-----------------------	-----------------	-----------------

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover	
Waiting list total	4			
Extremely low income <=30% AMI	4	100.0%		
Very low income (>30% but <=50% AMI)	0	0.0%		
Low income (>50% but <80% AMI)	0	0.0%		
Families with children	0	0.0%		
Elderly families	4	100.0%		
Families with Disabilities	3	75.0%		
Race/ethnicity (White)	1	25.0%		
Race/ethnicity (Black)	3	75.0%		
Race/ethnicity (Asian/Other)	0	0.0%		
Race/ethnicity (Hispanic)	0	0.0%		
Characteristics by Bedroom Size (PH Only)				
1 BR	4	100.0%		
2 BR	0	0.0%		
3 BR	0	0.0%		
4 BR	0	0.0%		
5 BR	0	0.0%		
5+ BR	0	0.0%		
Is the waiting list closed (select one)?	No X Yes	If yes: Closed on 03/	07/2022	
How long has it been closed (# of months)?	7			
Does the PHA expect to reopen the list in the	PHA Plan year?	No	Yes	
Does the PHA permit specific categories of families onto the waiting list, even if				
generally closed? No	Yes			

Waitlist: AMP13WL

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHAwide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

Section 8 tenant-based assistance

X Public Housing

Combined Section 8 and Public Housing

Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover			
Waiting list total	131					
Extremely low income <=30% AMI	33	25.2%				
Very low income (>30% but <=50% AMI)	7	5.3%				
Low income (>50% but <80% AMI)	2	1.5%				
Families with children	2	1.5%				
Elderly families	127	97.0%				
Families with Disabilities	61	46.6%				
Race/ethnicity (White)	15	11.5%				
Race/ethnicity (Black)	117	89.3%				
Race/ethnicity (Asian/Other)	2	1.5%				
Race/ethnicity (Hispanic)	0	0.0%				
Characteristics by Bedroom Size (PH Only)						
1 BR	118	90.1%				
2 BR	13	9.9%				
3 BR	0	0.0%				
4 BR	0	0.0%				
5 BR	0	0.0%				
5+ BR	0	0.0%				
Is the waiting list closed (select one)?	No X Yes	If yes: Closed on 05/	10/2024			
How long has it been closed (# of nonths)?	- · · ·					
Does the PHA expect to reopen the list in the F	PHA Plan year?	No	Yes			
Does the PHA permit specific categories of far	nilies onto the waiting list, e	ven if				
generally closed? No	Yes					

Waitlist: AMP19LI

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHAwide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

Section 8 tenant-based assistance

X Public Housing

Combined Section 8 and Public Housing

Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	95		
Extremely low income <=30% AMI	21	22.1%	
Very low income (>30% but <=50% AMI)	6	6.3%	
Low income (>50% but <80% AMI)	2	2.1%	
Families with children	0	0.0%	
Elderly families	93	97.9%	
Families with Disabilities	52	54.7%	
Race/ethnicity (White)	18	19.0%	
Race/ethnicity (Black)	77	81.1%	
Race/ethnicity (Asian/Other)	2	2.1%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	92	96.8%	
2 BR	3	3.2%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)?	No X Yes	If yes: Closed on 05/	10/2024
How long has it been closed (# of 1 months)?			
Does the PHA expect to reopen the list in the l	PHA Plan year?	No	Yes
Does the PHA permit specific categories of far	milies onto the waiting list, e	ven if	
generally closed? No	Yes		

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Housing Needs of Families on th	e Public Housing Wait	ing Lists	
ate the housing needs of the families on the PHA's w de waiting list administered by the PHA. PHAs may ts at their option.			ng waiting
Hou	sing Needs of Families on	the Waiting List	
Waiting List Type: (select one)			
Section 8 tenant-based assistance			
X Public Housing			
Combined Section 8 and Public Housir	19		
Public Housing Site-Based or sub-juris If used, identify which development/su		nal)Housing	
	# of families	% of total families	Annual Turnover
Waiting list total	580		
Extremely low income <=30% AMI	255	44.0%	
Very low income (>30% but <=50% AMI)	33	5.7%	
Low income (>50% but <80% AMI)	15	2.6%	
Families with children	545	94.0%	
Elderly families	8	1.4%	
Families with Disabilities	48	8.3%	
Race/ethnicity (White)	55	9.5%	
Race/ethnicity (Black)	523	90.2%	
Race/ethnicity (Asian/Other)	17	2.9%	
Race/ethnicity (Hispanic)	4	0.7%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	350	60.3%	
3 BR	230	39.7%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR the waiting list closed (select one)?	0 No XYes	0.0% If yes: Closed on 08	/01/2023
onths)?			1
bes the PHA expect to reopen the list in the	PHA Plan year? milies onto the waiting list,	No	Yes

. Housing Needs of Families of		•	
ate the housing needs of the families on the PI de waiting list administered by the PHA. PHA ts at their option.			ng waiting
	Housing Needs of Families on	the Waiting List	
Waiting List Type: (select one)			
Section 8 tenant-based assistance	•		
X Public Housing			
Combined Section 8 and Public I	Housing		
	b-jurisdictional waiting list (option	nal)Housing	
If used, identify which developm		nat)riousing	
n abea, identify which developin	entrous junisaterion.		
	# of families	% of total families	Annual Turnover
Waiting list total	1506		
Extremely low income <=30% AMI	575	38.2%	
Very low income			
(>30% but <=50% AMI)	109	7.2%	
Low income (>50% but <80% AMI)	43	2.9%	
Families with children	861	57.2%	
Elderly families	73	4.9%	
Families with Disabilities	199	13.2%	
Race/ethnicity (White)	138	9.2%	
Race/ethnicity (Black)	1374	91.2%	
Race/ethnicity (Asian/Other)	53	3.5%	
Race/ethnicity (Hispanic)	14	0.9%	
Characteristics by			
Bedroom Size (PH Only)			
1 BR	642	42.6%	
2 BR	519	34.5%	
3 BR	345	22.9%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
the waiting list closed (select one)?	No XYes	If yes: Closed on 08/	/01/2023
ow long has it been closed (# of onths)?	10		
oes the PHA expect to reopen the list i	in the DUA Dian year?	No	Yes

. Housing Needs of Families or	n the Public Housing Wait	ing Lists	
ate the housing needs of the families on the PHA de waiting list administered by the PHA. PHAs ts at their option.	· ·		ng waiting
	Housing Needs of Families on	the Waiting List	
Waiting List Type: (select one) X Section 8 tenant-based assistance Public Housing Combined Section 8 and Public Housing If used, identify which development	jurisdictional waiting list (optio	nal)Housing	
	# of families	% of total families	Annual Turnover
Waiting list total	2		
Extremely low income <=30% AMI	0	0.0%	
Very low income (>30% but <=50% AMI)	0	0.0%	
Low income (>50% but <80% AMI)	0	0.0%	
Families with children	0	0.0%	
Elderly families	2	100.0%	
Families with Disabilities	1	50.0%	
Race/ethnicity (White)	1	50.0%	
Race/ethnicity (Black)	1	50.0%	
Race/ethnicity (Asian/Other)	0	0.0%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	0	0.0%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR the waiting list closed (select one)? ow long has it been closed (# of onths)?	No XYes	0.0% If yes: Closed on	
oes the PHA expect to reopen the list in	the PHA Plan year?	No	Yes
bes the FHA expect to reopen the list in	the FITA Fian year?		105

de waiting list administered by the PHA. PHAs ma ts at their option.	vi i	, ,	
Но	ousing Needs of Families on	the Waiting List	
Waiting List Type: (select one)			
Section 8 tenant-based assistance			
Public Housing			
Combined Section 8 and Public House	vina		
Public Housing Site-Based or sub-jun If used, identify which development/	risdictional waiting list (option	nal)Housing	
	# of families	% of total families	Annual Turnover
Waiting list total	134		
Extremely low income <=30% AMI	27	20.1%	
Very low income (>30% but <=50% AMI)	9	6.7%	
Low income (>50% but <80% AMI)	1	0.7%	
Families with children	1	0.8%	
Elderly families	133	99.3%	
Families with Disabilities	71	53.0%	
Race/ethnicity (White)	20	14.9%	
Race/ethnicity (Black)	113	84.3%	
Race/ethnicity (Asian/Other)	1	0.8%	
Race/ethnicity (Hispanic)	2	1.5%	
Characteristics by Bedroom Size (PH Only)			
1 BR	130	97.0%	
2 BR	4	3.0%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
the waiting list closed (select one)?	No X Yes	If yes: Closed on 05	/10/2024
ow long has it been closed (# of onths)?	ı		_
			1

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Waitlist:	CUDDDV/
waiuist.	CHPPDV

B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHAwide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

Section 8 tenant-based assistance

Public Housing

Combined Section 8 and Public Housing

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	709		
Extremely low income <=30% AMI	0	0.0%	
Very low income (>30% but <=50% AMI)	0	0.0%	
Low income (>50% but <80% AMI)	0	0.0%	
Families with children	445	62.8%	
Elderly families	17	2.4%	
Families with Disabilities	53	7.5%	
Race/ethnicity (White)	46	6.5%	
Race/ethnicity (Black)	671	94.6%	
Race/ethnicity (Asian/Other)	16	2.3%	
Race/ethnicity (Hispanic)	15	2.1%	
Characteristics by Bedroom Size (PH Only)			
1 BR	244	34.4%	
2 BR	286	40.3%	
3 BR	179	25.3%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)?	No Yes	If yes: 05	5/21/2024
How long has it been closed (# of nonths)?			
Does the PHA expect to reopen the list in the I	PHA Plan year?	No	Yes
Does the PHA permit specific categories of far generally closed? No	nilies onto the waiting list, e Yes	ven if	-

Page 1

Housing Needs of Families or		-	•	
tate the housing needs of the families on the PHA vide waiting list administered by the PHA. PHAs sts at their option.				sing waiting
	Hous	ing Needs of Families on	the Waiting List	
Waiting List Type: (select one)				
Section 8 tenant-based assistance				
Public Housing				
Combined Section 8 and Public He	ousing	g		
Public Housing Site-Based or sub- If used, identify which development	-		nal)Housing	
		# of families	% of total families	Annual Turnover
Waiting list total		510		
Extremely low income <=30% AMI		0	0.0%	
Very low income (>30% but <=50% AMI)		0	0.0%	
Low income (>50% but <80% AMI)		0	0.0%	
Families with children		242	47.5%	
Elderly families		30	5.9%	
Families with Disabilities		55	10.8%	
Race/ethnicity (White)		16	3.1%	
Race/ethnicity (Black)		499	97.8%	
Race/ethnicity (Asian/Other)		9	1.8%	
Race/ethnicity (Hispanic)		3	0.6%	
Characteristics by Bedroom Size (PH Only)				
1 BR		264	51.8%	
2 BR		146	28.6%	
3 BR		100	19.6%	
4 BR		0	0.0%	
5 BR		0	0.0%	
5+ BR		0	0.0%	
s the waiting list closed (select one)?	X	No Yes	If yes: 0	6/07/2024
Iow long has it been closed (# of nonths)?	0			_
Does the PHA expect to reopen the list in	the P	HA Plan year?	No	Yes

1.Strategy for Addressing Housing Need.

MHA is seeking to work with the City of Mobile and collaborate towards a unified strategy for addressing the Housing Needs. MHA's Housing Needs are identical to the needs and demographics throughout the MSA. The Mobile Housing Authority strategy for addressing the needs is to:

- Implement landlord outreach initiatives to increase more available units for HCV participants;
- Decrease the wait time to house families off the public housing waiting list in order to increase occupancy.
- Assist in the long-term viability of affordable housing by moving the subsidy base of public housing to the Section 8 platform (either Project Based Vouchers or Project Based Rental Assistance) using the tools provided by the U.S. Department of Housing and Urban Development's ("HUD") Rental Assistance Demonstration ("RAD") Program, the Low Income Housing Tax Credit program ("LITHC") administered by the Alabama Housing Finance Agency ("AHFA"), Section 18 Demolition/Disposition protocols under HUD rules, other Project-based Voucher ("PBV"), affordable or market driven initiatives. Generally, the housing will remain affordable with rents based on 30 percent of family's household income.

MHA has contracted with Econometrica as its Asset Repositioning Specialist. Through this contract MHA will revitalize its Public Housing developments via the RAD program. In addition, MHA plans to assist in the long-term viability of the affordable housing through:

- The Low-Income Housing Tax Credit program ("LITHC") administered by the Alabama Housing Finance Agency ("AHFA"),
- Section 18 Demolition/Disposition protocols under HUD rules,
- The Rental Assistance Demonstration (RAD) Program
- One of the affordable populations on which MHA will focus includes single heads of households (many with children), the elderly, and persons with disabilities.
- MHA plans to issue project-based vouchers to help support the development of new affordable housing.

Service Provider Partnerships/Key Programs. MHA continues to participate in the Veterans Affairs Supportive Housing (VASH) program, a partnership between MHA and the local Veterans Administrative Office. MHA has a Memorandum of Understanding (MOU) with Housing First, the Continuum of Care for Mobile, to administer the Emergency Housing Voucher (EHV) and Mainstream voucher programs, targeting families who are at risk of homelessness or currently experiencing homelessness and non-elderly disabled households, respectively. MHA also administers the Family Unification Program (FUP) under an MOU with the Department of Rehabilitation Service.

Economic and Self-Sufficiency Programs

MHA coordinates, promotes, or provides the following programs to enhance the economic and social self-sufficiency of resident and/or participant families:

Economic and Life-style Independence Services and Programs						
Program Name and Description (including location, if appropriate)	Estimated Size	Allocation Method (random selection/specific criteria/recruit new move ins/ enroll on a first come basis/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or Section 8 participants or both)		
S-8 FSS	67	Random; applicant recruitme nt	Resident Services	HCV (i.e., S-8)		
PH FSS	57	Random; applicant recruitme nt	Resident Services	Affordable Housing		
Employment and Job- training Preparation	300	Referrals	Resident Services	Both		

Family Self Sufficiency ("FSS") Participation Programs

Program	Required Number of Participants (start of 2020 Estimate)	Actual Number of Participants (As of: 08/31/2023)
Affordable Housing	83	57
Section 8	113	72

B.1b (2) Statement of Financial Resources - No Change

MOBILE HOUSING AUTHORITY FY 2025 PLANNED FINANCIAL RESOURCES

MHA's statement of estimated or anticipated financial resources, by general categories, as referenced in Section 6.2 of this FY2025 Annual Plan is set forth below:

		FY 2025
	Sources	Planned \$
1.	Federal Grants (FY 2025):	
	a. Public Housing Operating Fund	\$ 7,500,000
	b. Public Housing Capital Fund	\$ 8,200,000
	c. Housing Choice Voucher Program (Section 8)	\$ 38,000,000
	d. Mainstream Five Housing Voucher Program	\$ 1,100,000
	e. Emergency Housing Voucher Program	\$ 500,000
2.	Prior Yr- Unobligated	
	a. Public Housing Capital Fund	\$ 12,000,000
3.	Public Housing Dwelling Rental Income	
	a. Dwelling Rental Income	\$ 3,200,000
4.	Other Income	
	a. Miscellaneous Income	\$ 500,000
	b. Sale of three Public Housing Properties	
	TOTAL FINANCIAL RESOURCES	\$ 71,000,000

B.1b (3) Significant Amendment/Modification

Mobile Housing Authority's (MHA) amendment of the definition of "significant/substantial Amendment" and/or "substantial deviation/modification" is set forth below.

MA FY2021-2025 Five-Year Plan

A "significant/substantial amendment" or "substantial deviation/modification" to MHA's FY2021 – 2025 Five-Year Plan ("Five-Year Plan") is defined as any (i) additional changes that would fundamentally change MHA's mission as stated in the Plan, and/or (ii) substantial or extensive changes, modifications, or amendments to the Five-Year Plan that materially and significantly modify one or more of MHA's goals listed in Section 5.2 of the Five-Year Plan, such as the addition of new demolition, disposition or RAD conversions not already included in the Plan or new plans for homeownership, Capital Fund Financing, mixed finance or additional development not otherwise included in the plan. A change in MHA's objectives or strategies in reaching those goals will not be considered a "significant amendment" or "substantial deviation/modification." Moreover, a "significant amendment" or "substantial deviation/modification" *will not* include any of the following items related to the Rental Assistance Demonstration ("RAD") Program:

- 1. A change in MHA's objectives or strategies in reaching the goals outlined in the Five-Year Plan.
- 2. For a project already designated in the Plan for RAD conversion:
 - a. Changes to using Project Based Rental Assistance or Project Based Voucher Assistance
 - b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
 - c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
 - d. Changes to the financing structure for each approved Rad conversion.

Other than for a "significant/substantial amendment" or a "substantial deviation/modification," as defined above, MHA may make changes to its Five-Year Plan without the necessity of resubmitting the entire Five-Year Plan document, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board or resident consultation.

MHA FY2025 Annual Plan.

A "significant/substantial amendment" or "substantial deviation/modification" to MHA's <u>FY2025</u> Annual Plan ("Annual Plan") are defined as any substantial changes, modifications, or amendments to the Annual Plan that materially and significantly modify MHA's agency goals listed in Section 5.2 of the Five-Year Plan or materially and significantly modify the strategies outlined in the Annual Plan, such as the addition of new demolition, disposition or RAD conversions not already included in the Plan or new plans for homeownership, Capital Fund Financing, mixed finance or additional development not otherwise included in the

plan. Notwithstanding the foregoing, MHA may, from time to time, make changes in the Annual Plan and any attachments thereto, in order to maximize the flexibility provided for in the regulations of the programs administered by MHA and included in any applicable Annual Plan and such changes shall not be considered a "significant/substantial amendment" or "substantial deviation/modification."

The following will not be considered a "significant/substantial amendment" or "substantial deviation/modification" to the Annual Plan:

- 1. For a project already designated in the Plan for RAD conversion:
 - a. Changes to using Project Based Rental Assistance or Project Based Voucher Assistance
 - b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
 - c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
 - d. Changes to the financing structure for each approved RAD conversion.
 - e. Changes to the asset repositioning score card as it relates the timing of RAD applications for the various developments.

Other than for a "significant/substantial amendment" or a "substantial deviation/ modification," as defined above, MHA may make changes to its FY2025 Annual Plan without the necessity of re-submitting the entire FY2025 Plan document, conducting a public hearing, or otherwise engaging in FY2025 Plan Resident Advisory Board or resident consultation.

B.1.c The PHA must submit its Deconcentration Policy for Field Office review.

MHA's ACOP for the LIPH Program, in Section 4.3B, titled, "Selection Method," under the heading, (Deconcentration of Poverty and Income-Mixing) policy is as follows:

Steps for Implementation [24 CFR 903.2(c) (1)]

Step 1. The MHA must determine the average income of all families residing in all the MHA's covered developments. The MHA may use the median income, instead of average income, provided that the MHA includes a written explanation in its annual plan justifying the use of median income.

MHA Policy

The Mobile Housing Authority will determine the average income of all families in all covered developments on an annual basis.

Step 2. The MHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the MHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

MHA Policy

The Mobile Housing Authority will determine the average/median income of all families in each covered development, adjusting for unit size with procedures prescribed by HUD, on an annual basis.

Step 3. The MHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The MHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the MHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances MHA's deconcentration policy may include, but is not limited to the following:

- •Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- •Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- •Establishing a preference for admission of working families in developments below the EIR
- •Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration

•Providing other strategies permitted by statute and determined by MHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and MHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under MHA's deconcentration policy. MHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under MHA's deconcentration policy [24 CFR 903.2(c) ()(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, MHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

MHA Policy

For developments outside the EIR MHA will take the following actions to provide for deconcentration of poverty and income mixing:

Deconcentration Rule

A. Objective:

The objective of the Deconcentration Rule for public housing units is to ensure that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development. The specific objective of the MHA is to house no less than 40 percent of its public housing inventory with families that have income at or below 30% of the area median income by public housing development. Also the MHA will take actions to ensure that no individual development has a concentration of higher income families in one or more of the developments.

B. Exemptions:

The following are exempt from this rule.

- Public housing development with fewer than 100 public housing units. A covered development is defined as any single development or contiguous developments that total over 100 units.
- Public housing developments, which house only elderly persons or persons with disabilities, or both.
- Public housing developments, which consist of only one general occupancy family public housing development.
- Public housing developments approved for demolition or conversion to residentbased assistance.
- Mixed financing developments.

C. Actions:

To accomplish the deconcentration goals, the MHA will take the following actions:

- At the beginning of each MHA fiscal year, the MHA will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the previous MHA fiscal year.
- 2. To accomplish the goals of deconcentration:
 - a. Not less than 40% of the MHA admissions on an annual basis shall be to families that have incomes at or below 30% of area median income (extremely low-income), and
 - b. The MHA shall determine the average income of all families residing in all the MHA's covered developments. The MHA shall determine the average income of all families residing in each covered development. In determining average income for each development, the MHA has adjusted its income analysis for unit size in accordance with procedures prescribed by HUD. The MHA shall determine whether each of its covered developments falls above, within or below the established income range. The established income range is from 85 to 115 percent (inclusive) of the average family income.

Deconcentration and Income Mixing Report

August 30, 2023

There are two allowable methods of analyzing incomes to determine if Public Housing developments have average, annual resident incomes that fall outside the Established Income Range (EIR); the standard method and a method that employs unit size adjustment factors. We are opting to use the standard method. An explanation of how that determination was reached follows:

Income Analysis Using Standard Method

We identified which MHA Public Housing Developments were considered "covered" developments and determined the average annual incomes of <u>each</u> development and of all developments. Developments dedicated exclusively to senior citizens and/ or disabled were excluded as allowed by regulations.

Covered MHA developments and the average annual income of each:

1.	Oaklawn	\$9, 482
2.	Orange Grove	\$12, 830
3.	Gulf Village	\$10, 755
	Total	\$33,067
	Average	\$11,022

The average annual income of all covered developments (\$11, 022) was used to determine the Established Income Range (EIR): 85% to 115% of \$11, 022 or \$9, 369 to \$12, 675.

<u>Result:</u> Using the standard method, no developments fell below 85%. Orange Grove exceeded 115% of average.

Explanation:

Orange Grove remains one of MHA's most desired developments. Additionally, it was part of the now defunct Wealth Program, which attracted residents with higher incomes. Residents were required to be employed and/or in school. Higher preferences were given to applicants with higher incomes.

Implementation:

At this time, none of MHA's developments are fall below the Established Income Range. However, should a development fall below the Established Income Range MHA will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve the MHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer. MHA will also skip a family on the waiting list to reach another family in an effort to further the goals of deconcentration.

MHA Affirmatively Further Fair Housing Efforts

MHA seeks to work with the City of Mobile to develop a long-term strategy for redevelopment and maintenance of public housing sites, and affordable housing opportunities in the City of Mobile. Mobile Housing Authority is represented on the Board of the Continuum of Care, the Homeless Coalition of the Gulf Coast, which services citizens experiencing homelessness in Mobile. The Continuum of Care works in conjunction with Housing First. MHA is part of a community partnership, which works with the City of Mobile advocacy organizations affirmatively to further fair housing by providing training and guidance within the locality. Information is disseminated city wide utilizing social media, and the MHA website, <u>www.mobilehousing.org</u> To support the City's commitment to non-

discrimination and equal opportunity in housing, MHA makes special efforts to assure that housing programs assisted with federal or local funds are made widely known throughout the community.

Preventing Conditions that Limit Participation

Mobile Housing Authority continues to ensure updates are made to its Admissions and Continued Occupancy Plan (ACOP) and Housing Choice Voucher Administrative Plan in order. Mobile Housing Authority fully utilizes its Reasonable Accommodation Policy and all Reasonable Accommodations are processed through the designated 504 Coordinators. MHA provides a copy of the Reasonable Accommodation Policy to tenants and applicants ensuring that they are aware that they may at any time, request a reasonable accommodation, including reasonable accommodations so that the tenant can meet lease requirements or other requirements of tenancy. Mobile Housing Authority provides a copy of the Reasonable Accommodation Policy to every applicant at the time of interview and to each tenant at annual recertification.

MHA also includes the following language on applicant correspondence, reexamination documents, and notices of adverse action by MHA: "If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority." When applying for housing, the application portal also permits applicants to select accessibility requirements including hearing, mobility, or sight access, as applicable. Mobile Housing Authority is also taking steps to ensure that all developments comply with Uniform Accessibility Standards.

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) communication is available.

To meet the needs of persons with vision impairments, large-print key program documents will be made available upon request. Key program documents include the following:

- 1. Application for Housing
- 2. Application for Continued Occupancy
- 3. Lease Agreement
- 4. Reasonable Accommodation Policy
- 5. Grievance Procedure
- 6. VAWA documents
- 7. Smoke Free Policy
- 8. Citizenship Form
- 9. Privacy Act
- 10. EIV and Debts Owed Forms
- 11. Pet Policy

When visual aids are used in public meetings or presentations, or in meetings with MHA staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation, having material explained orally by staff, or having a third party representative (a friend, relative

or advocate, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings, upon request. Should sign language interpretation be requested, MHA will procure the services of a qualified organization such as Alabama Institute for the Deaf and Blind.

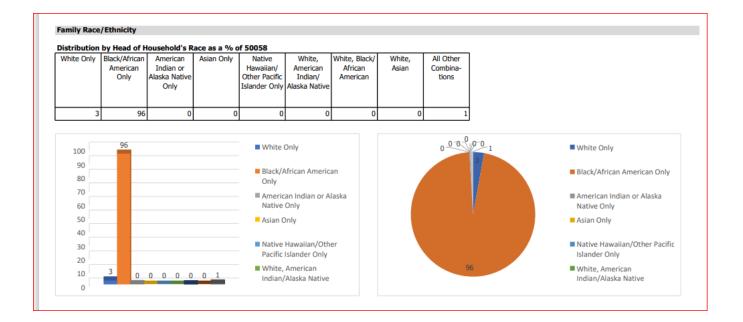
Program Demographics

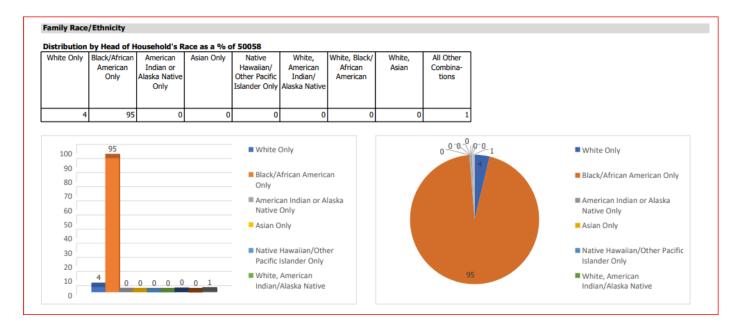
Mobile Housing Authority has examined its programs and have determined the following distribution of Head of Households Race.

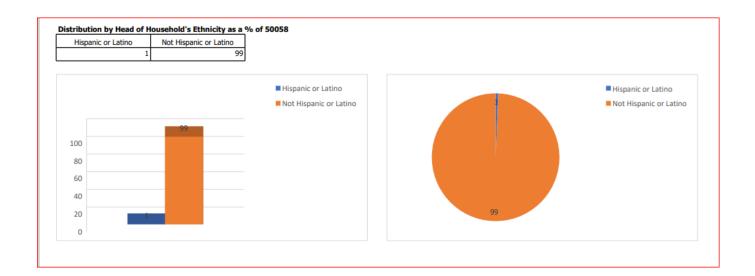
- A. Public Housing
 - White -3
 - Black/African America 96%
 - American Indian or Alaska Native 0
 - Asian -0
 - Other -1
- B. Housing Choice Voucher
 - White -4%
 - Black/African America 95%
 - American Indian or Alaska Native 0
 - Asian -0
 - Other -1

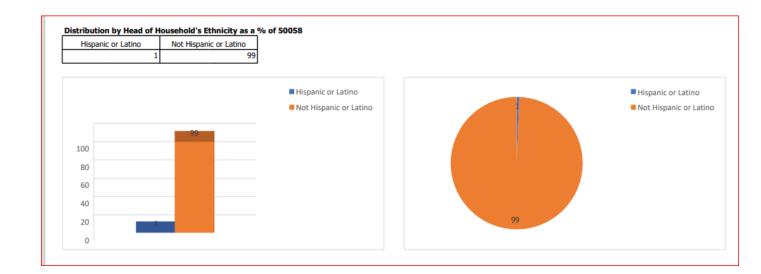
Mobile Housing Authority has examined its programs and have determined the following distribution of Head of Households Ethnicity:

- A. Public Housing
 - Hispanic or Latino 1%
 - Not Hispanic or Latino 99%
- B. Housing Choice Voucher
 - Hispanic or Latino 1%
 - Not Hispanic or Latino 99%









An analysis of demographics and locational patterns determined that Housing Choice Vouchers and Public Housing Developments are concentrated in high poverty tracts and neighborhoods of minority concentration. These neighborhoods, units, and developments are located predominantly in the City of Mobile and to its immediate north.

In this section we summarize the location of MHA HCV units and public or senior housing developments. The maps and other descriptive information presented here show the relationship between the location of MHA's HCVs and public/senior housing and several neighborhood-level¹ characteristics: poverty²; racial segregation³; "opportunity"⁴; and age of the rental housing stock⁵. We also examine the distribution of "voucher-affordable" rental units⁶, especially in relation to HCVs and opportunity tracts in Mobile County.

Poverty concentration and racial segregation

¹ We use census tracts as proxies for neighborhoods.

 $^{^2}$ We employ poverty rate data for census tracts from the 2015-19 5-year American Community Survey, table S1701.

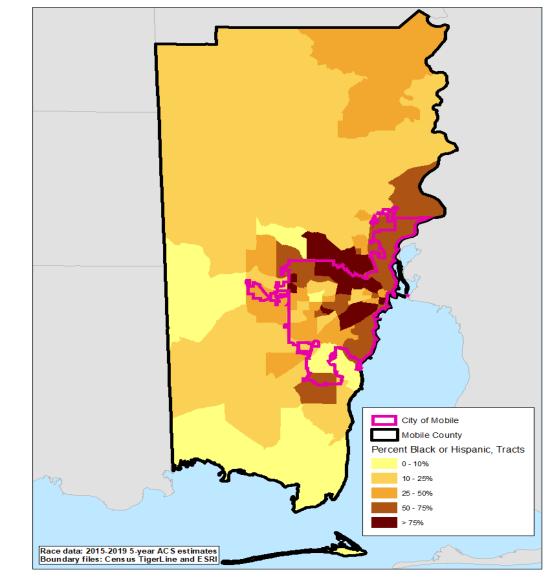
³ We compute the census tract share of residents that are non-Hispanic Black or Hispanic, using data from the 2015-19 5-year American Community Survey, table B03002.

⁴ Opportunity data are downloaded from the <u>Opportunity Atlas</u>. Opportunity is conceived in terms of economic mobility, such that opportunity tracts are those in the upper two quintiles in Mobile County on the following Opportunity Atlas measure: Mean household income rank for children whose parents were at the 25th percentile of the national income distribution. For more information, see: Chetty, R., Friedman, J., Hendren, N., Jones, M., Porter, S. The Opportunity Atlas: Mapping the Childhood Roots of Social Mobility. 2018. NBER Working Paper No. 25147.

⁵ We compute the census tract share of rental units in structures built before 1980, using data from the 2015-19 American Community Survey, table B25036.

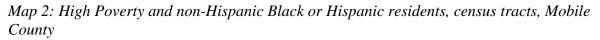
⁶ We estimate census tract totals of voucher-affordable rental units as the number of rental units with gross rents below Mobile Housing Authority's 2BR payment standard, which is 110% of the 2BR fair market rent of \$906. Census tract gross rent data are from the 2015-19 American Community Survey, table B25063.

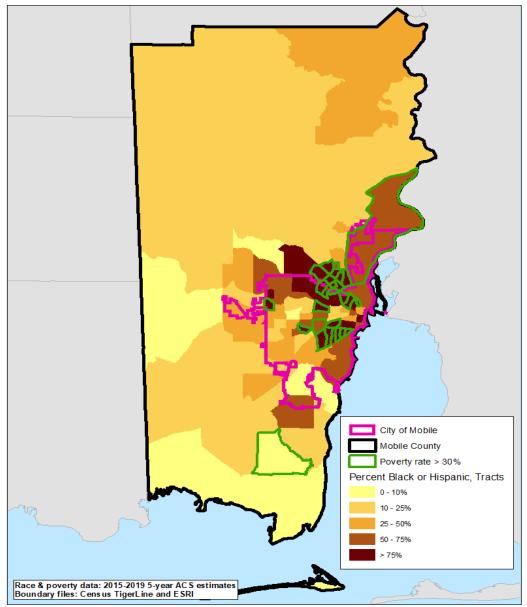
Map 1 (below) depicts the share of non-Hispanic Black or Hispanic residents for census tracts in Mobile County. Tract shares range from the lowest percentages (0-10% Black or Hispanic) which are shaded in the lightest yellow, to the highest (over 75% Black or Hispanic) which are represented in the darkest colors on the map. Tracts with the highest shares of Black or Hispanic residents are in the city of Mobile (i.e. within the municipal border demarcated in pink on the map) or to the city's immediate north and northeast.



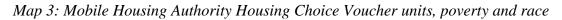
Map 1: Share of non-Hispanic Black and Hispanic residents, census tracts, Mobile County

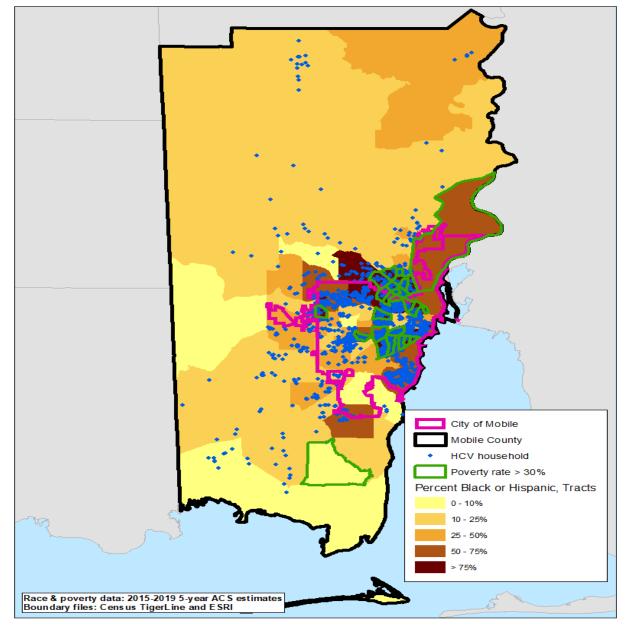
Map 2 shows the relationship between poverty and racial concentration, by highlighting the boundaries of high poverty tracts (defined as tracts with poverty rates of 30% and above) in green. The race information is replicated from Map 1. We observe that almost all of the neighborhoods in Mobile County with the highest poverty rates are in the city or to its north. Furthermore, these high poverty neighborhoods are typically also tracts with the highest shares of Black or Hispanic residents.





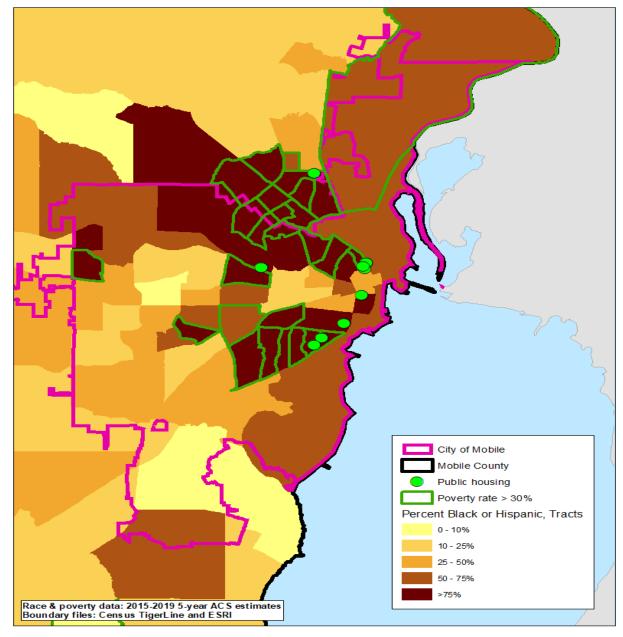
Map 3 plots the location of MHA HCV units⁷ against poverty rate and the share of Black or Hispanic residents, with each blue representing one voucher unit. We observe that many of the voucher units are providing rental assistance for rental units located in the city of Mobile. Additionally, high concentrations of voucher units are located in census tracts with high poverty and high shares of Black or Hispanic residents.





⁷ Map plots location of 4,056 MHA voucher units with, as of May 25th, 2021.

Map 4 shows the location of MHA public housing⁸ or senior living⁹ developments, plotted again against poverty rate and the share of Black or Hispanic residents.



Map 4: Mobile Housing Authority public and senior living developments, poverty and race

⁸ Public housing developments as listed on the MHA website, here: <u>https://mobilehousing.org/housing-programs/affordable-housing</u>

⁹ Senior living developments as listed on the MHA website, here: <u>https://mobilehousing.org/housing-programs/senior-living</u>

Using the U.S. Department of Housing and Urban Development's (HUD) definition, we designate a census tract in Mobile County as an "area of minority concentration" if the tract's share of non-white¹⁰ residents is 20 or more percentage points greater than the Mobile County's share of non-white residents¹¹. We observe that 62 percent of MHA's voucher units are in areas of minority concentration. Furthermore, 10 of 10 public housing or senior living developments are located in areas of minority concentration, and all but one are located in neighborhoods with non-white shares of at least 95 percent.

In addition, 4.4 percent of voucher units are in low poverty tracts, defined as having a poverty rate of 10 percent or lower. By contrast, 32 percent of MHA voucher units are in high poverty tracts, and we estimate that an even higher percentage (over 50%) of voucher units with children are in high poverty tracts. Seven of the ten MHA public housing or senior living developments are located in high poverty neighborhoods.

Finally, there are 25 tracts that are areas of minority concentration *and* have poverty rates above 30%. We observe that 32 percent of voucher units, are in these tracts, including a high percentage of children living in MHA-assisted units.

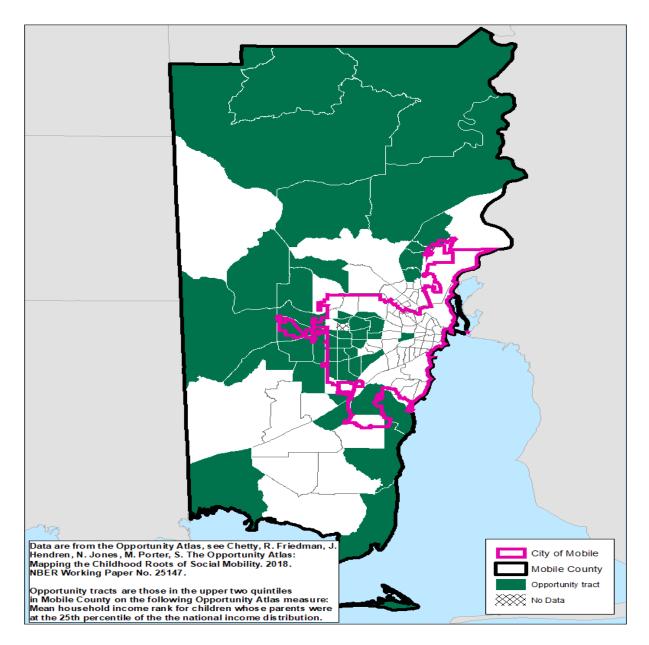
¹⁰ Here, "white" is defined as non-Hispanic white.

¹¹ According to 2015-19 5-Year American Community Survey data, Mobile County has a share of non-white residents of 43.11%. Therefore, a tract in Mobile County is considered an "area of minority concentration" if it has a share of non-white residents of at least 63.11%.

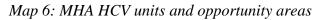
Opportunity areas

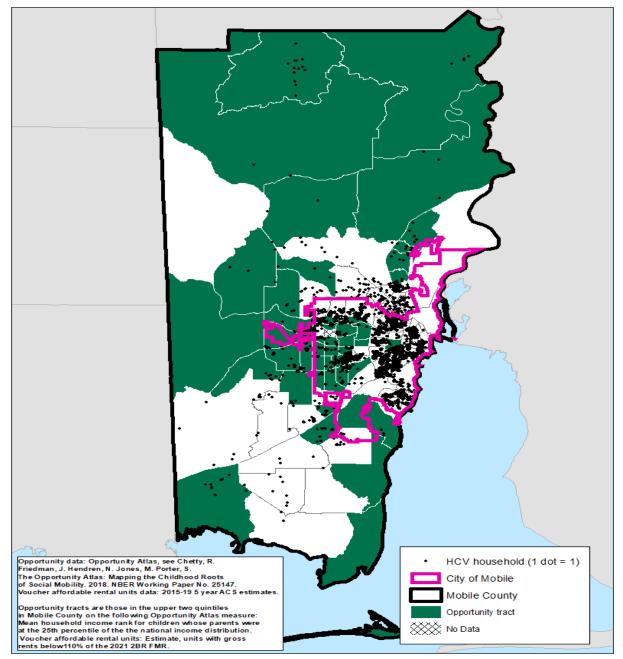
The census tracts colored green in Map 5 are those we designate as "opportunity" areas (see footnote 4 above for definition). Opportunity tracts are clustered primarily to the north and west of the city of Mobile, however with a number of opportunity areas within the municipal boundary and on the west side. There are no opportunity tracts that are also high poverty areas. By contrast, 11 (out of 45) opportunity tracts are low-poverty. In addition, only 2 of 45 opportunity tracts are also areas of minority concentration.

Map 5: Opportunity areas



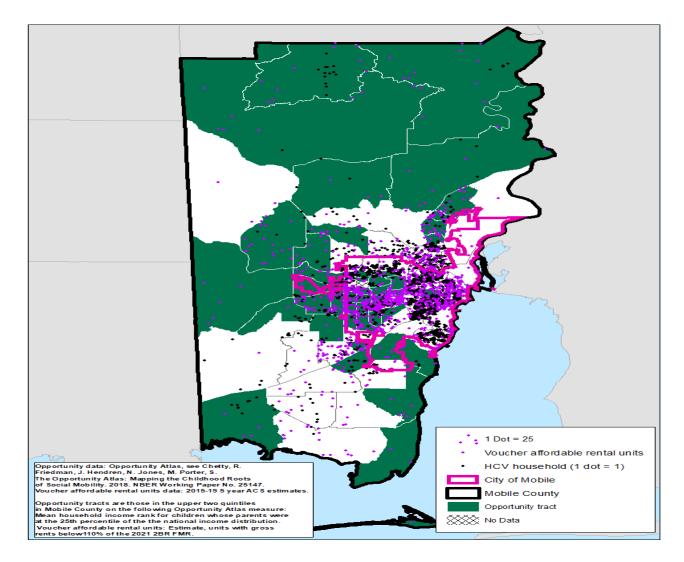
Map 6 overlays MHA HCV units on the opportunity area map. We observe that most units are located outside of opportunity tracts. Some voucher households are located in opportunity areas, however, especially in neighborhoods on the west side of the city of Mobile. Specifically, 79 percent of voucher units are located outside of opportunity tracts. None of the public housing or senior living developments are in opportunity areas (see map 8).



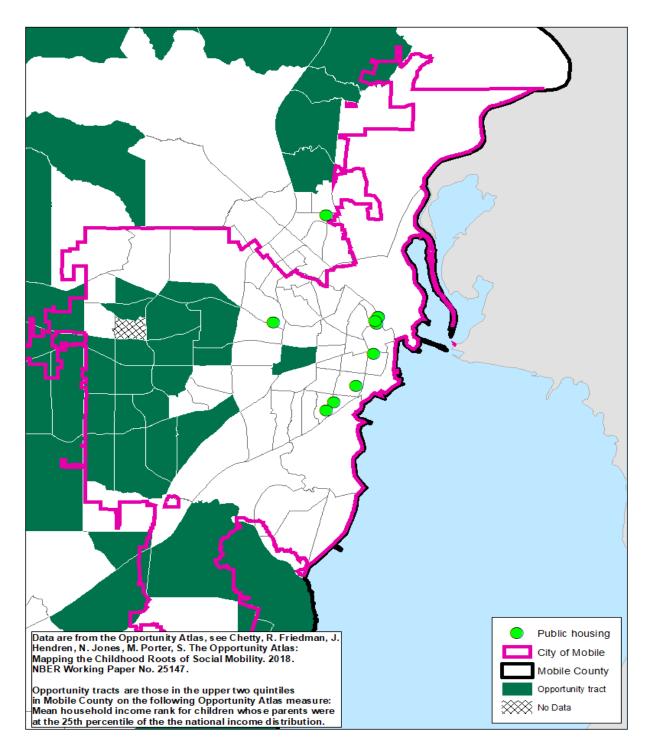


Map 7 includes voucher-affordable rental units (defined above in footnote 6), which are depicted as 25 units per purple dot. These rental units are concentrated in the largest numbers within the city of Mobile, both in the eastern tracts containing many HCV units and in the western opportunity areas. We also see concentrations of voucher-affordable units outside of the city, in close-in tracts – both opportunity and non-opportunity – to the north and west. Large numbers of voucher-affordable units are also observable in neighborhoods in southern Mobile County. Further, we find that 41.5 percent of voucher-affordable rental units are located in opportunity neighborhoods. Lastly, of the 61.7 percent of occupied rental units in Mobile County are voucher-affordable.¹²

Map 7: MHA HCV units, Voucher-affordable rental units, and opportunity areas



¹² We looked at whether estimates of voucher-affordable units would increase from incorporating 2BR Small Area Fair Market rents in ZIP Codes where it is greater than MHA's payment standard. In fact, there are only three ZIP Codes in which this occurs, and in those locations the SAFMR is only slightly larger than the payment standard. As a result, the impact of using SAFMRs on the estimate of voucher-affordable units is negligible in Mobile County.



Map 8: Public housing and senior living developments and opportunity areas

We compute the census tract share of rental units in structures built before 1980 as a proxy for the "quality" of a building (this also roughly coincides with the date when lead paint was phased out of new building construction). Large stocks of older – and perhaps lower quality – rental structures may make it difficult to absorb an expansion of housing choice voucher units.

Overall, 52.4 percent renter-occupied units in Mobile County are in structures built before 1980.¹³ As such, it seems reasonable to designate a census tract's rental stock as old if at least 50 percent is in structures built before 1980. And, 57 percent of tracts in Mobile County (64 of 113) have at least 50 percent of renter-occupied units in structures built before 1980. Furthermore, 35 percent of tracts (40 of 113) have at least 75 percent of rental units in "old" structures, and this share is at least 90 percent in 13 percent of tracts (15 of 113).

There are only 17 tracts that are opportunity areas and that have at least 50 percent of renteroccupied units in structures built before 1980. Finally, we observe at present that 64 percent of MHA voucher units are located in tracts that have at least 50% of renter-occupied units in structures built before 1980.

Location and Type of Affordable Housing

Public housing residents are almost exclusively African American and families with children, and the housing is located in racially/ethnically concentrated areas of poverty (R/ECAPs) and surrounded by communities that have fallen into disrepair, with few job opportunities, services, grocery stores, banks, and other amenities.

As MHA begins to consider locational options for placement of Project Based Vouchers or redevelopment of public housing units, MHA seeks to balance housing opportunities in high poverty neighborhoods with a continuing need for safe, stable, affordable housing, with housing options in neighborhoods that offer greater opportunities for families to build long-term economic and social wealth, such as those with well-funded schools, healthy environments, and stable job opportunities.

MHA's HCV program is comprised largely of families with children. To address this housing need, MHA plans to offer services to assist HCV program participants with finding housing within the MHA jurisdiction. This may include creating new incentives for owners with larger-sized units that are located close to well-funded schools, housing search assistance that includes staff dedicated to conducting owner outreach to present the HCV program to owners that may be reluctant to accept the voucher, higher payments standards in opportunity areas; and partnership with community organizations that support families' health and well-being to provide warm referrals for families as they transition into new neighborhoods.

Previous research indicates, housing for those with disabilities and seniors is more likely to be located in higher opportunity locations and have a more integrated population. However, the

¹³ Data from 2015-19 5-year American Community Survey. By comparison, the overall share for the U.S. is 56.4 percent, so it appears that rental units in Mobile County are in structures slightly less old than is the case nationally.

majority of accessible housing is located in western Mobile, limiting choice for those with disabilities. To address this housing need, MHA will offer housing search assistance as requested to those with disabilities. In addition, flexibilities may to the HCV leasing process, including landlord incentives such as expedited inspections can be provided in order to provide for the greatest housing choice.

Availability of Affordable Units in a Range of Sizes, Accessible Housing Provide more housing in areas of high opportunity and reduce barriers to affordable housing

Research indicates there is a lack of affordable housing to meet the needs of residents in Mobile, including those with disabilities. Currently, families with children are concentrated in areas that have higher exposure to poverty, as well as areas with the highest negative environmental health risks.

There is a significant need for quality, affordable housing throughout the city of Mobile. MHA plans to work with developers and other partners to support and pursue affordable housing development in high opportunity areas, including the placement of Project Based Vouchers.

B.2 New Activities

(a) See Template checkboxes

B.2.b (1) Disposition of Public Housing Under Section 18.

In accordance with MHA's Five Year 2021-2025 Five Year Plan and approved Section 18 Disposition Application for R.V. Taylor, the Authority has replaced the plans in the 2024 Annual PHA Plan to rehabilitate 193 units at R.V. Taylor using RAD with plans to sell the Parcel to the City of Mobile for their plans to redevelop the parcel with new construction affordable housing units.

R.V. Taylor Plaza

1a. Development name: R.V. Taylor Plaza – Parcel 6 Only

1b. Development (project) number: AL002000010/Partial – Parcel 6 Only

1c. Description of development: This is the remaining 38 acre portion of this former public housing development that has 112 dwelling unit buildings remaining. Residents, including families, singles and seniors formerly occupied the units, but they have been vacated. This remaining parcel consists of 193 three, four and five bedroom units. It is located along the northeast side of Duval Street at the southwest corner of Arlington Street and Kellogg Street, Mobile, AL 36605.

2. Activity Type: Public Housing

3. **Application Status:** Section 18 Approved, technical correction submitted awaiting approval.

- 4. Number of units affected: 193
- 5. Coverage of action: 100% of remaining parcel
- 6. Timeline of activity:
 - a. Projected start date of activity: 3rd quarter 2024
 - b. Projected end date of activity: 4th quarter 2024

B.2.b (2) Conversion of Public Housing to Project-Based Assistance under RAD.

Subject to funding availability, eligibility and other Notice of Funding Availability criteria, if applicable, MHA plans to redevelop, revitalize, or otherwise reposition the communities set forth below. In order to assist with the financing of such activities, Mixed Finance Repositioning/Modernization, Rental Assistance Demonstration ("RAD"), tax credit, Development, conventional/non-conventional loans, gifts, grants, awards, donations, or other affordable housing related funding for the community or communities as described below:

Central Plaza Towers Renov	vation and		
Conversion to PBRA throug	h RAD		
Closing and Start of	,		
Renovation Spring 2025			
Name of Public Housing	PIC Development	Conversion Type:	Transfer of Assistance:
Project:	ID:	v I	
Central Plaza Towers	AL02000012	PBRA	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type,	Capital Fund Allocation of
	(i.e., Family, Senior,	if different:(i.e.,	Development: (Annual
	etc.)	Family, Senior, etc.	Capital Fund Grant, divided
	,		by total number of public
			housing units in PHA,
			multiplied by total number of
			units in project)
			(465 X \$2, 789)
465	Senior	Same	\$1, 296, 885
Bedroom Type	Number of Units Pre-	Number of Units Post-	Change of Number of Units
	Conversion	Conversion	per Bedroom Type and Why
			(DeMinimus Reduction,
			Transfer of Assistance, Unit
			Reconfiguration, etc.)
Studio/Efficiency	196	0	Reconfiguration of the interior
-			of the studios by adding a door
			and similar adjustments that
			enable the units to be
			recharacterized as 1 BR units.
One Bedroom	234	433	All existing one bedroom units
			will remain one bedroom, but
			three will remain non-
			dwelling units.
Two Bedroom	33	30	3 two bedroom units will be
			split to create six one bedroom
			units.
Three Bedroom	2	2	None

MHA will use in addition to the preferences already contained within its ACOP, it will use the following preference for its RAD properties: Applicant families that were displaced due to the disposition of R.V. Taylor and Thomas James Place will have first preference for units rehabilitated through the RAD conversion process.

No transfer of assistance is planned at CPT at the time of this conversion

MHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and any compliance will not be negatively impacted by conversion activities.

Onon as Crosse Ban assotion a	nd		
Orange Grove Renovation a Conversion to PBV through			
Start date of activity:2026	KAD		
End date of activity: 2029			
Name of Public Housing	PIC Development	Conversion Type:	Transfer of Assistance:
Project:	ID:		
Orange Grove Homes	AL02000002	PBV	No
Total Units:	Pre-RAD Unit Type: (i.e., Family, Senior, etc.)	Post-RAD Unit Type, if different :(i.e., Family, Senior, etc.	Capital Fund Allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) (247 X \$2, 789)
247	Family	Family	\$688, 883
Bedroom Type	Number of Units Pre- Conversion	Number of Units Post- Conversion	Change of Number of Units per Bedroom Type and Why (DeMinimus Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	32	32	
Two Bedroom	164	164	
Three Bedroom	51	51	
Non-Dwelling Units	2	2	

MHA will use in addition to the preferences already contained within its ACOP, it will use the following preference for its RAD properties: Applicant families that were displaced due to the disposition of R.V. Taylor and Thomas James Place will have first preference for units rehabilitated through the RAD conversion process.

No transfer of assistance is planned at Orange Grove at the time of this conversion

MHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and any compliance will not be negatively impacted by conversion activities.

Oaklawn Homes Renovation	a and		
Conversion to PBV through			
Start date of activity:2025			
End date of activity: 2028			
Name of Public Housing	PIC Development	Conversion Type:	Transfer of Assistance:
Project:	ID:		
Oaklawn Homes	AL02000001	PBV/Section 18 Blend	No
Total Units:	Pre-RAD Unit Type: (i.e., Family, Senior, etc.)	Post-RAD Unit Type, if different :(i.e., Family, Senior, etc.	Capital Fund Allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)(95 X \$2,789)
95	Family	Family	\$264,955
Bedroom Type	Number of Units Pre-	Number of Units Post-	Change of Number of Units
	Conversion	Conversion	per Bedroom Type and Why (DeMinimus Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	15	15	
Two Bedroom	60	60	
Three Bedroom	20	20	
Non-Dwelling Units	2	2	

MHA will use in addition to the preferences already contained within its ACOP, it will use the following preference for its RAD properties: Applicant families that were displaced due to the disposition of R.V. Taylor and Thomas James Place will have first preference for units rehabilitated through the RAD conversion process.

No transfer of assistance is planned at Oaklawn at the time of this conversion

MHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and any compliance will not be negatively impacted by conversion activities.

Gulf Village Renovation and	4		
Conversion to PBV through			
Start date of activity:2026			
End date of activity: 2029			
Name of Public Housing	PIC Development	Conversion Type:	Transfer of Assistance:
Project:	ID:		
Gulf Village	AL0200006	PBV	No
Total Units:	Pre-RAD Unit Type: (i.e., Family, Senior, etc.)	Post-RAD Unit Type, if different :(i.e., Family, Senior, etc.	Capital Fund Allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) (199 X \$2, 789)
199	Family	Family	\$555,011
Bedroom Type	Number of Units Pre- Conversion	Number of Units Post- Conversion	Change of Number of Units per Bedroom Type and Why (DeMinimus Reduction, Transfer of Assistance, Unit Reconfiguration, etc.)
One Bedroom	30	30	
Two Bedroom	120	120	
Three Bedroom	49	49	
Non-Dwelling Units	2	2	

MHA does not yet have a individual CHAP on Gulf Village, it is just part of an overall MHA Portfolio RAD CHAP.

MHA will use in addition to the preferences already contained within its ACOP, it will use the following preference for its RAD properties: Applicant families that were displaced due to the disposition of R.V. Taylor and Thomas James Place will have first preference for units rehabilitated through the RAD conversion process.

No transfer of assistance is planned at Gulf Village at the time of this conversion

MHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and any compliance will not be negatively impacted by conversion activities.

B.2.b (3) Project-Based Vouchers.

MHA will project-base a portion of its tenant-based vouchers (TBVs). MHA's goal through project-basing these vouchers is to increase the supply of affordable housing in accordance with the PHA Plan strategy for addressing housing needs in the Mobile community and deconcentrate poverty. MHA will seek to project-base vouchers in areas of higher income and lower percentages of minority concentration. MHA will not ignore areas of historic poverty, specifically where major demolition and disposition activities are planned for MHA owned properties where public housing residents may experience displacement. Instead, PBVs will be used in these areas to support the new construction of affordable housing opportunities and reduce significant displacement. The construction of new affordable housing units is of critical need in Mobile, over 52% of the renteroccupied units in Mobile County were built prior to 1980. New affordable housing opportunities in areas of historic poverty along with other development efforts that can expand economic opportunities has the potential to increase economic and racial diversity in a community leading to improved overall outcomes for educational achievement, job growth and reduced crime. These outcomes are what MHA aims to achieve through the anchoring effect of supporting new construction of affordable housing using project-base vouchers. Activities MHA will participate in over the next year include:

1. Review the data available from the Census Bureau *Survey of Market Absorption of New Multifamily Units* (SOMA), released quarterly for surveys completed in the prior quarter, to determine the amount of new affordable housing that is needed in the Mobile.

2. Issuing a PBV RFP for projects seeking to place PBVs in developments in Mobile.

3. MHA may consider Project Basing up to an additional 200 vouchers, including possible Project Basing of Veteran Affairs Supportive Housing (VASH) voucher allocation, in several projects throughout the city and county.

4. Locations of PBV units aim to include, but not be limited to areas north and west of the city of Mobile and the downtown corridor. HUD approved the conversion of 305 tenant-based vouchers (TBV) to project-based vouchers (PBV), pursuant to this conversion of TBVs to PBVs, the MHA HCV program released a request for proposals (RFPs) for developers seeking PBV contracts which will remain open until all 305 PBVs have been awarded. In its initial publication of the request for proposal, two projects were awarded a total of 110 PBVs (96 and 14 respectively). 96 PBVs were awarded to Maryvale Place development located in zip code 36605 and 14 PBVs were awarded to Live Oak Trace development 36608. Under a second publication of the RFP for developers seeking PBV contracts, 95 PBVs were awarded to a rehabilitation project in Berkshire Arms in zip code 36609, and 100 PBVs were awarded to the Creel Road development in 36541.

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.

Mobile Housing Authority ("MHA") FY2021 - FY2025 5-Year Plan and FY2025 Annual Plan highlights MHA's intention to pursue its aggressive housing related goals assisting eligible residents of affordable housing and participants in the Housing Choice Voucher Program toward other non-subsidized housing, including homeownership, and use its housing as a catalyst for the empowerment of qualified residents. MHA expects to accomplish these goals by continuing to reposition and upgrade its public and affordable

housing inventory, attendant resources and community partnerships necessary to promote an environment and atmosphere of economic and lifestyle independence. While MHA will maintain emphasis of serving the elderly and disabled residents and modernizing its facilities, it remains committed to providing able-bodied resident/participant families with the training, skills, encouragement and incentives to move "out of assisted housing into homeownership or other non- assisted housing". With this initiative and its other activities, MHA looks to "change the face of affordable housing, one family at a time!"

MHA's Five-Year Goals

<u>MHA Strategic Goal No. I:</u> Design, enhance and implement community revitalization and redevelopment initiatives and strategies in collaboration with key strategic partners, and create quality affordable housing within vibrant communities for families.

• MHA has raised its cumulative occupancy to 98%. All developments continue to meet or exceed its goal of 96% occupancy.

<u>MHA Strategic Goal No. 2:</u> Enhance the attractiveness and marketability of the housing stock and neighborhoods in order to attract and retain working families.

- MHA is committed to creating a new spirt and pride within its developments by encouraging tenants to take pride in and ownership of the cleanliness of the place they call home.
- MHA has enhanced the curb appeal of its communities by focusing on the removal trash, litter and debris scattered in the community by residents and third parties.
- Resumed required housekeeping inspections/unit visits via collaboration between property management and resident services to determine the condition of each occupied unit, to counsel, and encourage residents.

<u>MHA's Strategic Goal No. 3:</u> Improve quality of housing resources and related service delivery to internal and external customers by enhancing operational efficiency, support systems and coordination with community providers.

- MHA has engaged in training of its management, maintenance and support professionals to enhance the internal capacity, knowledge and skill of its employees and their ability to provide more efficient services to residents. Such training has included Fair Housing Training, HCV Specialist Training, LIPH Management Training, Sexual Harassment/EEO/Workplace Harassment Training, FSS Program Updates, HCV Payment Standards, Section 3 Training, PHA Budgeting. Accounting and Financial Reporting Training.
- MHA has continued the ongoing upgrade and enhancement of its electronic and computer hardware.
- Continued to make supportive services available for elderly and disabled families through various community partnerships.

<u>MHA Strategic Goal No. 4:</u> Improve the public and community image of MHA by updating and executing a comprehensive Public Relations and Marketing Strategy.

- MHA will continue its active participation in initiatives designed to discuss and promote redevelopment and affordable housing in and around the City of Mobile.
- MHA continues to improve the public awareness of our products, services and initiatives via enhanced website content, presentations to professional trade clubs, other housing providers and interactions with community foundations.
- MHA will establish partnerships with local philanthropic organizations to ensure the communities collective efforts to improve the lives of low to moderate income persons functions cohesively and targets resources better to enhance outcomes.

B.4 Capital Improvements

Section B.4 is answered in the template form itself.

B.5 Most Recent Fiscal Year Audit

(b) Please describe the findings from the most recent FY Audit.

- 1. Financial Reporting
 - 1. Material Weakness in Internal Control
- 2. Delayed Financial Reporting
 - 1. Unaudited Financial Data Schedule submitted 2 months late
- 3. Eligibility (HCV Program)
 - 1. Late/Delayed Recertifications
 - 2. Missing Proper Identification

Written responses have been provided to the auditors and significant progress has been made towards resolution.

Section C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) Comments

Please see attachment C.1, submitted by the MHA as an electronic attachment to this PHA Plan.

C.2 Certification by State or Local Officials

Please see attachment C.2, submitted by the MHA as an electronic attachment to this PHA Plan.

C.3 Civil Rights Certification

Please see attachment C.3. submitted by the MHA as an electronic attachment to this PHA Plan.

C.4 Challenged Elements

Section C.4 is answered in the template form itself.

C.5 Troubled PHA - Voluntary Compliance Agreement (VCA) Executed

(a) Yes, MHA has a current Recovery Agreement and VCA with HUD in place.

(b) If Yes, please describe.

MHA is classified as a Troubled PHA. Due to the extent of its deficiencies the agency entered into a Recovery Agreement with HUD dated January 27, 2021. The goal of the Recovery Agreement is to transition MHA from Troubled to Standard Performance designation. The Action Plan identifies the measures that need to be implemented to improve the performance and desired outcomes to be achieved. It also establishes a timetable to achieve those outcomes. MHA has completed 85% of the items identified in the agreement.