

5-Year PHA Plan <i>(for All PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 09/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The **Form HUD-50075-5Y** is to be completed once every 5 PHA fiscal years by all PHAs. PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

A.	PHA Information.
A.1	<p>PHA Name: _____ PHA Code: _____</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>The Five-Year Period of the Plan (i.e. 2019-2023): _____</p> <p>PHA Plan Submission Type: <input type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.</p>

☐ 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 Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements. Required for all PHAs completing this form.

B.1 Mission. State the PHA's mission for serving the needs of low-, very low-, and extremely low-income families in the PHA's jurisdiction for the next 5 years.

B.2

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next 5 years.

B.3

Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of survivors of domestic violence, dating violence, sexual assault, or stalking.</p>
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B.5	<p>Project-Based Activities. If a PHA intends to select one or more projects for project-based assistance without competition in accordance with 24 CFR 983.51(c), the PHA must include a statement of this intent.</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p>

<p>C.2</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>C.3</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 9/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do **not** need to submit this form. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	<p>PHA Name: _____ PHA Code: _____</p> <p>PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____</p> <p>Total Combined Units/Vouchers _____</p> <p>PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.</p>

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

B.2 New Activities.

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

Y N

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

(b) If any of these activities are planned for the applicable Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

B.3

Progress Report.

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

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N <input type="checkbox"/> <input type="checkbox"/> (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	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

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:

2026-2030 5-Year and 2026 Annual Plan Attachment Section Narratives



Mobile Housing Authority
2026-2030 5-Year and 2026 Annual Plan

Table of Contents

<i>2026-2030 HUD-50075-5Y 5-Year Plan Response Narratives</i>	<i>3</i>
<i>Section A. PHA Information</i>	<i>3</i>
<i>Section B. Plan Elements.....</i>	<i>3</i>
B.1 Mission	3
B.2 Goals and Objectives & B.3 Progress Report.....	3
B.3 Progress Report (included in B.2)	3
B.4 Violence Against Women Act (VAWA Goals)	5
B.5 Project-Based Activities	6
<i>Section C. Other Documents and/or Certification Requirements.....</i>	<i>6</i>
C.1 Significant Amendment or Modification	6
C.2 Resident Advisory Board (RAB) Comments.....	8
C.3 Certification by State or Local Officials	8
C.4 Challenged Elements	8
<i>2026 HUD-50075-ST Annual Plan Response Narratives</i>	<i>10</i>
<i>Section A. PHA Information</i>	<i>10</i>
Background:.....	4
<i>Section B. Plan Elements.....</i>	<i>10</i>
B.1 Revision of PHA Plan Elements.....	10
B.2 New Activities.....	47
B.3 Progress Report.....	56
B.4 Capital Improvements	57
B.5 Most Recent Fiscal Year Audit.....	58
<i>Section C. Other Documents and/or Certification Requirements.....</i>	<i>58</i>
C.1 Resident Advisory Board (RAB) Comments	58
C.2 Certification by State or Local Officials	58
C.3 Civil Rights Certification	58
C.4 Challenged Elements	58
C.5 Troubled PHA.....	58
<i>Section E. RAD Attachment</i>	<i>59</i>

Mobile Housing Authority
2026-2030 5-Year and 2026 Annual Plan

2026-2030 HUD-50075-5Y 5-Year Plan Response Narratives

Section A. PHA Information

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

Section B. Plan Elements

B.1 Mission

MHA's mission is to be a catalyst for Community and Family Empowerment. In furtherance of this mission, MHA seeks to promote personal, economic and social upward mobility and economic and lifestyle independence to provide families the opportunity to make the transition from subsidized to non-subsidized housing.

B.2 Goals and Objectives & B.3 Progress Report

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Mobile Housing Authority ("MHA") FY2026 - FY2030 5-Year Plan and FY2026 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!"

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

MHA's Five-Year Goals.

MHA Strategic Goal No. 1: 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 continues to maintain high occupancy levels, above 96%, at each of its public housing developments.

MHA Strategic Goal No. 2: 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 spirit and pride within its developments by encouraging tenants to take pride in and ownership of the cleanliness of the place they call home.
- MHA continues to focus on the curb appeal of its communities by focusing on the removal trash, litter and debris scattered in the community by residents and third parties.
- MHA conducts bi-annual 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.

MHA's Strategic Goal No. 3: 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 continues to focus on staff training 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, Public Housing Specialist Training, , Sexual Harassment/EEO/Workplace Harassment Training, and FSS Program Updates.
- 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.

MHA Strategic Goal No. 4: 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 the City of Mobile's and various neighborhood planning sessions and other initiatives designed to

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.3 Progress Report (included in B.2)

See previous section B.2 includes progress report.

B.4 Violence Against Women Act (VAWA Goals)

From the MHA ACOP, Section 16-VII.C

MHA Policy

MHA will post the following information regarding VAWA in its offices and on its website. It will also make the information readily available to anyone who requests it:

- A notice of occupancy rights under VAWA to public housing program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)
- A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)
- A copy of MHA's emergency transfer plan (Exhibit 16-3)
- A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)
- The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800- 787-3224 (TTY) (included in Exhibit 16-1)
- Contact information for local victim advocacy groups or service providers

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

- The VAWA information provided to applicants and participants will consist of the notices in Exhibit 16-1 and 16-2.
- MHA will provide applicants with information about VAWA during their interview for housing assistance. MHA will also include such information in all notices of denial of assistance (see section 3-III.F).
- MHA will provide tenants with information about VAWA at the time of admission (see section 8-I.B) and at annual reexamination. MHA will also include such information in all lease termination notices (see section 13-IV.D).

MHA's goal is to expand awareness and support for VAWA covered individuals and families.

B.5 Project Based Activities

Section C. Other Documents and/or Certification Requirements

C.1 Significant Amendment or Modifications

Mobile Housing Authority's (MHA) definition of "Significant/Substantial Amendment," and/or "substantial Deviation/Modification," is as set forth below:

MA FY2026-2030 Five-Year Plan

A "significant/substantial amendment" or "substantial deviation/modification" to MHA's FY2026 – 2030 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 B.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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual 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 re-submitting the entire Five-Year Plan document, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board or resident consultation.

MHA FY2026 Annual Plan.

Any substantial changes, modifications, or amendments to the Annual Plan that materially and significantly modify MHA’s agency goals listed in Section B.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 FY 2026-2030 5-Year Plan or FY2026 Annual Plan without the necessity of re-submitting the entire FY 2026-

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

2030 5-Year or FY2026 Plan document, conducting a public hearing, or otherwise engaging in FY2026 Plan Resident Advisory Board or resident consultation.

C.2 Resident Advisory Board (RAB) Comments

See attachment C.2

C.3 Certification by State or Local Officials

See attachment C.3.

C.4 Challenged Elements

None.

Mobile Housing Authority
2026-2030 5-Year and 2026 Annual Plan

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Mobile Housing Authority
2026-2030 5-Year and 2026 Annual Plan

2026 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 Existing 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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP01WL

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	447		
Extremely low income <=30% AMI	55	12.3%	
Very low income >30% but <=50% AMI	11	2.5%	
Low income >50% but <80% AMI	4	0.9%	
Families with children	341	76.3%	
Elderly families	16	3.6%	
Families with Disabilities	54	12.1%	
Race/ethnicity (White)	82	18.3%	
Race/ethnicity (Black)	370	82.8%	
Race/ethnicity (Asian/Other)	12	2.7%	
Race/ethnicity (Hispanic)	17	3.8%	
Characteristics by Bedroom Size (PH Only)			
1 BR	70	15.7%	
2 BR	200	44.7%	
3 BR	177	39.6%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 07/18/2025			
How long has it been closed (# of months)? 0			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP02WL

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	622		
Extremely low income <=30% AMI	230	37.0%	
Very low income (>30% but <=50% AMI)	30	4.8%	
Low income (>50% but <80% AMI)	15	2.4%	
Families with children	473	76.1%	
Elderly families	20	3.2%	
Families with Disabilities	59	9.5%	
Race/ethnicity (White)	56	9.0%	
Race/ethnicity (Black)	575	92.4%	
Race/ethnicity (Asian/Other)	20	3.2%	
Race/ethnicity (Hispanic)	7	1.1%	
Characteristics by Bedroom Size (PH Only)			
1 BR	94	15.1%	
2 BR	386	62.1%	
3 BR	142	22.8%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 11/06/2024			
How long has it been closed (# of months)? 8			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP06WL

Page 1

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 PHA-wide 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) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> 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	669		
Extremely low income <=30% AMI	113	16.9%	
Very low income >30% but <=50% AMI	11	1.6%	
Low income >50% but <80% AMI	7	1.0%	
Families with children	564	84.3%	
Elderly families	15	2.2%	
Families with Disabilities	56	8.4%	
Race/ethnicity (White)	84	12.6%	
Race/ethnicity (Black)	589	88.0%	
Race/ethnicity (Asian/Other)	27	4.0%	
Race/ethnicity (Hispanic)	20	3.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	72	10.8%	
2 BR	334	49.9%	
3 BR	263	39.3%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 07/18/2025 How long has it been closed (# of months)? 0 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Page 1

Waitlist: AMP12WL

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	1		
Extremely low income <=30% AMI	1	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	1	100.0%	
Families with Disabilities	1	100.0%	
Race/ethnicity (White)	0	0.0%	
Race/ethnicity (Black)	1	100.0%	
Race/ethnicity (Asian/Other)	0	0.0%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	1	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)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: Closed on 03/07/2022			
How long has it been closed (# of months)? 40			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Page 1

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	100		
Extremely low income <=30% AMI	11	11.0%	
Very low income >30% but <=50% AMI	3	3.0%	
Low income >50% but <80% AMI	0	0.0%	
Families with children	0	0.0%	
Elderly families	98	98.0%	
Families with Disabilities	50	50.0%	
Race/ethnicity (White)	9	9.0%	
Race/ethnicity (Black)	91	91.0%	
Race/ethnicity (Asian/Other)	2	2.0%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	93	93.0%	
2 BR	7	7.0%	
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)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 07/18/2025			
How long has it been closed (# of months)? 0			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP19[L]

Page 2

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	86		
Extremely low income <=30% AMI	6	7.0%	
Very low income >30% but <=50% AMI	3	3.5%	
Low income >50% but <80% AMI	1	1.2%	
Families with children	0	0.0%	
Elderly families	84	97.7%	
Families with Disabilities	46	53.5%	
Race/ethnicity (White)	10	11.6%	
Race/ethnicity (Black)	77	89.5%	
Race/ethnicity (Asian/Other)	1	1.2%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	72	83.7%	
2 BR	14	16.3%	
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)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 07/18/2025			
How long has it been closed (# of months)? 0			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP19PBV

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 PHA-wide 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) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> 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	98		
Extremely low income <=30% AMI	16	16.3%	
Very low income (>30% but <=50% AMI)	6	6.1%	
Low income (>50% but <80% AMI)	1	1.0%	
Families with children	1	1.0%	
Elderly families	95	96.9%	
Families with Disabilities	51	52.0%	
Race/ethnicity (White)	8	8.2%	
Race/ethnicity (Black)	90	91.8%	
Race/ethnicity (Asian/Other)	1	1.0%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	89	90.8%	
2 BR	9	9.2%	
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)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 07/18/2025 How long has it been closed (# of months)? 0 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP20WL

Page 1

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 PHA-wide 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) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> 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	148		
Extremely low income <=30% AMI	74	50.0%	
Very low income >30% but <=50% AMI)	14	9.5%	
Low income >50% but <80% AMI)	6	4.1%	
Families with children	146	98.7%	
Elderly families	2	1.4%	
Families with Disabilities	10	6.8%	
Race/ethnicity (White)	6	4.1%	
Race/ethnicity (Black)	141	95.3%	
Race/ethnicity (Asian/Other)	2	1.4%	
Race/ethnicity (Hispanic)	0	0.0%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	80	54.1%	
3 BR	68	46.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: Closed on 08/01/2023 How long has it been closed (# of months)? 23 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: AMP21WL

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	490		
Extremely low income <=30% AMI	250	51.0%	
Very low income >30% but <=50% AMI	59	12.0%	
Low income >50% but <80% AMI	23	4.7%	
Families with children	308	62.9%	
Elderly families	23	4.7%	
Families with Disabilities	51	10.4%	
Race/ethnicity (White)	29	5.9%	
Race/ethnicity (Black)	462	94.3%	
Race/ethnicity (Asian/Other)	13	2.7%	
Race/ethnicity (Hispanic)	3	0.6%	
Characteristics by Bedroom Size (PH Only)			
1 BR	193	39.4%	
2 BR	174	35.5%	
3 BR	123	25.1%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: Closed on 08/01/2023			
How long has it been closed (# of months)? 23			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: CHPPEV

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 PHA-wide 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)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> 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	1096		
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	884	80.7%	
Elderly families	16	1.5%	
Families with Disabilities	69	6.3%	
Race/ethnicity (White)	85	7.8%	
Race/ethnicity (Black)	1033	94.3%	
Race/ethnicity (Asian/Other)	29	2.7%	
Race/ethnicity (Hispanic)	18	1.6%	
Characteristics by Bedroom Size (PH Only)			
1 BR	160	14.6%	
2 BR	630	57.5%	
3 BR	306	27.9%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: 11/25/2024			
How long has it been closed (# of months)? 8			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Waitlist: MVPPBV

Page 1

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 PHA-wide 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) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> 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	871		
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	379	43.5%	
Elderly families	75	8.6%	
Families with Disabilities	139	16.0%	
Race/ethnicity (White)	58	6.7%	
Race/ethnicity (Black)	828	95.1%	
Race/ethnicity (Asian/Other)	22	2.5%	
Race/ethnicity (Hispanic)	12	1.4%	
Characteristics by Bedroom Size (PH Only)			
1 BR	464	53.3%	
2 BR	384	44.1%	
3 BR	23	2.6%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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	70	Random; applicant recruitment	Resident Services	HCV (i.e., S-8)
PH FSS	60	Random; applicant recruitment	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	60	55
Section 8	70	70

B.1b (2) Statement of Financial Resources

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

MOBILE HOUSING AUTHORITY FY 2026 PLANNED FINANCIAL RESOURCES

MHA's statement of estimated or anticipated financial resources, by general categories, as referenced in Section 6.2 of this FY2026 Annual Plan is set forth below:

	Sources	FY 2026 Planned \$
1.	Federal Grants (FY 2026):	
	a. Public Housing Operating Fund	\$ 4,600,000
	b. Public Housing Capital Fund	\$ 8,500,000
	c. Housing Choice Voucher Program (Section 8)	\$ 41,000,000
	d. Mainstream Five Housing Voucher Program	\$ 1,500,000
	e. Emergency Housing Voucher Program	\$ 500,000
2.	Prior Yr- Unobligated	
	a. Public Housing Capital Fund	\$ 15,400,000
3.	Public Housing Dwelling Rental Income	
	a. Dwelling Rental Income	\$ 3,000,000
4.	Other Income	
	a. Miscellaneous Income	\$ 300,000
	TOTAL FINANCIAL RESOURCES - FY 2026	\$ 74,800,000

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

B.1b (3) Significant Amendment/Modification

Mobile Housing Authority's (MHA) definition of "Significant/Substantial Amendment," and/or "substantial Deviation/Modification," is as set forth below:

MA FY2026-2030 Five-Year Plan

A "significant/substantial amendment" or "substantial deviation/modification" to MHA's FY2026 – 2030 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 B.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 re-submitting the entire Five-Year Plan document, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board or resident consultation.

MHA FY2026 Annual Plan.

Any substantial changes, modifications, or amendments to the Annual Plan that materially and significantly modify MHA's agency goals listed in Section B.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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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 FY 2026-2030 5-Year Plan or FY2026 Annual Plan without the necessity of re-submitting the entire FY 2026-2030 5-Year or FY2026 Plan document, conducting a public hearing, or otherwise engaging in FY2026 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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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 resident-based assistance.
- Mixed financing developments.

C. Actions:

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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

1. 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

July 1, 2025

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 each 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. Orange Grove \$12, 632

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

2. Gulf Village	\$11, 835
Total	\$24, 467
Average	\$12, 234.

The average annual income of all covered developments (\$12, 234) was used to determine the Established Income Range (EIR): 85% to 115% of \$12, 234 or \$10, 399 to \$14, 069.

Result: Using the standard method, no developments fell below 85% nor did any developments exceed 115% of the average.

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, www.mobilehousing.org 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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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%
- Other – 1%

B. Housing Choice Voucher

- White – 4%
- Black/African America – 95%
- 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%

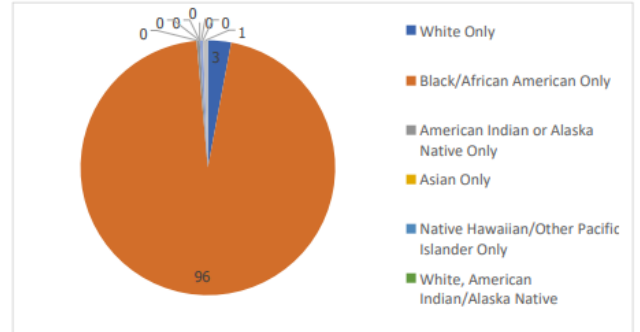
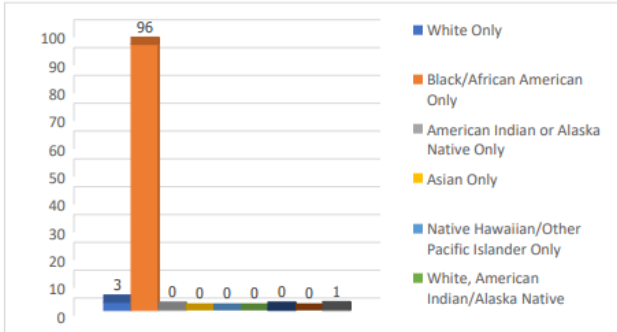
Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Family Race/Ethnicity

Distribution by Head of Household's Race as a % of 50058

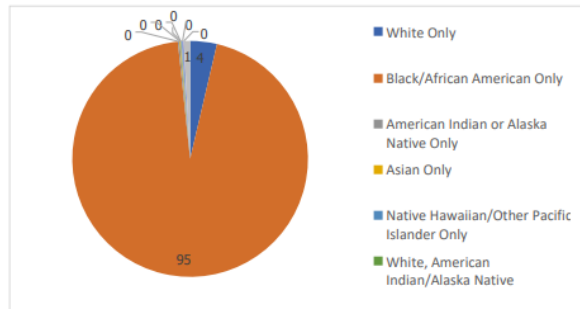
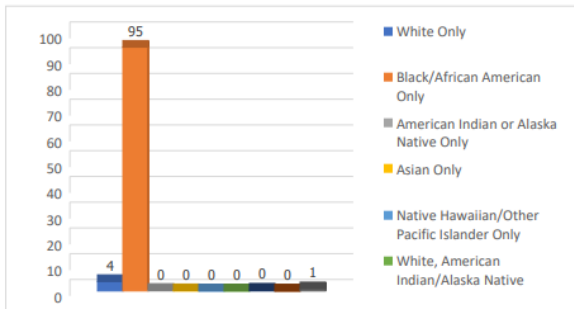
White Only	Black/African American Only	American Indian or Alaska Native Only	Asian Only	Native Hawaiian/ Other Pacific Islander Only	White, American Indian/ Alaska Native	White, Black/ African American	White, Asian	All Other Combinations
3	96	0	0	0	0	0	0	1



Family Race/Ethnicity

Distribution by Head of Household's Race as a % of 50058

White Only	Black/African American Only	American Indian or Alaska Native Only	Asian Only	Native Hawaiian/ Other Pacific Islander Only	White, American Indian/ Alaska Native	White, Black/ African American	White, Asian	All Other Combinations
4	95	0	0	0	0	0	0	1

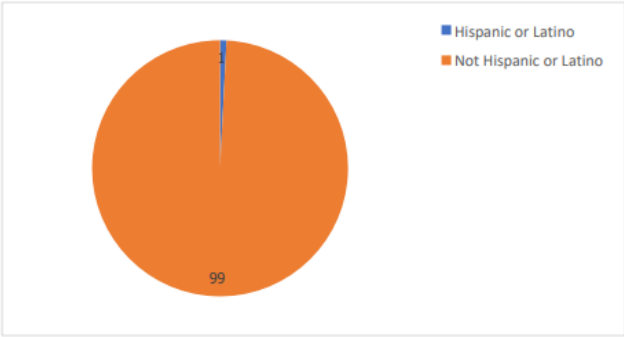
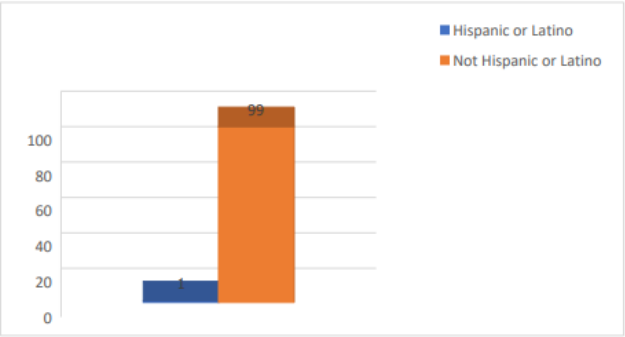


Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

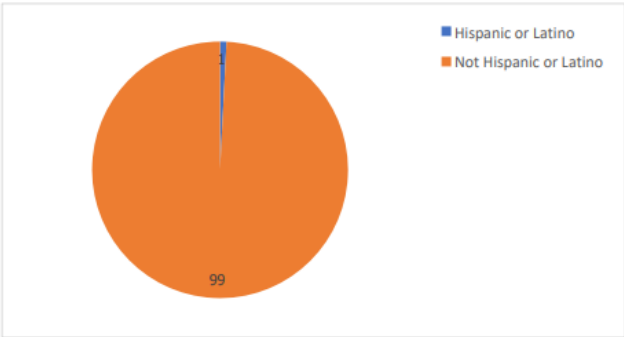
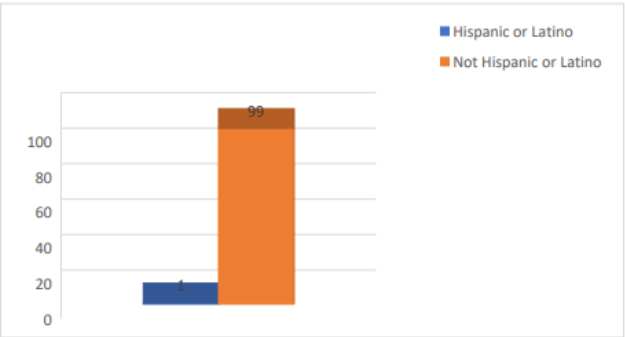
Distribution by Head of Household's Ethnicity as a % of 50058

Hispanic or Latino	Not Hispanic or Latino
1	99



Distribution by Head of Household's Ethnicity as a % of 50058

Hispanic or Latino	Not Hispanic or Latino
1	99



Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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 [Opportunity Atlas](#). 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.

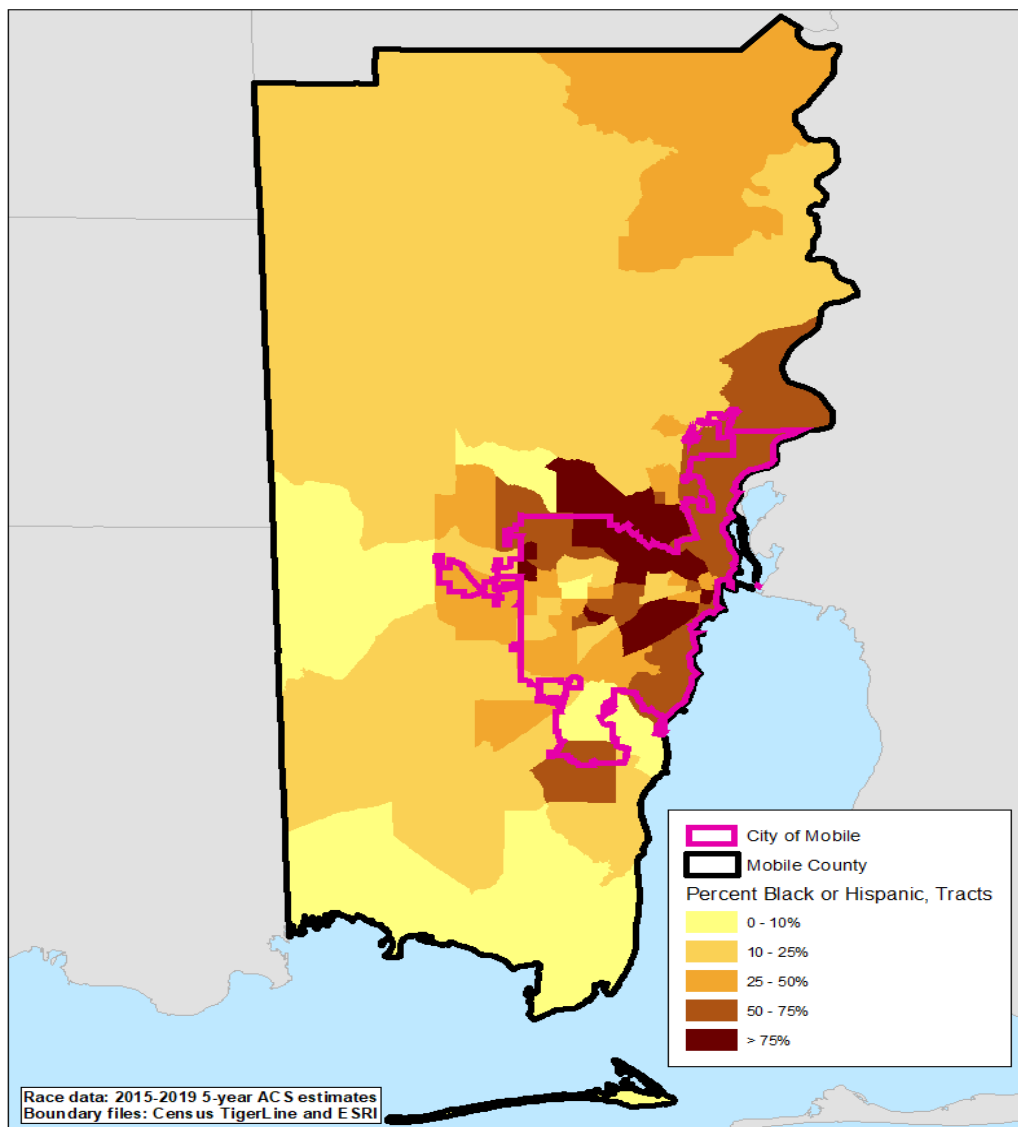
⁶ We estimate census tract totals of voucher-affordable rental units as the number of rental units with gross rents below Mobile Housing Authority's 2BR payment standard, which is 110% of the 2BR fair market rent of \$906. Census tract gross rent data are from the 2015-19 American Community Survey, table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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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

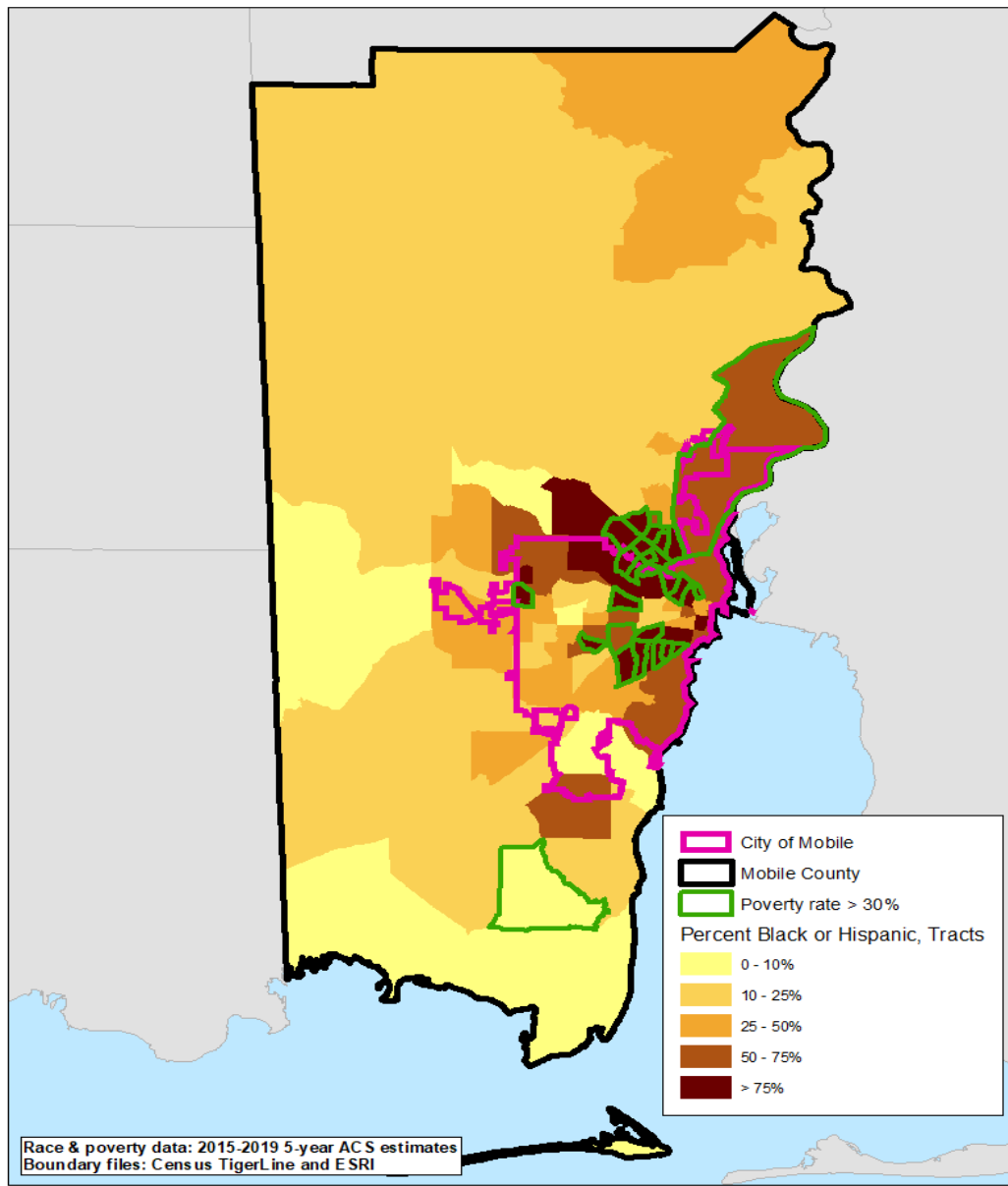


Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

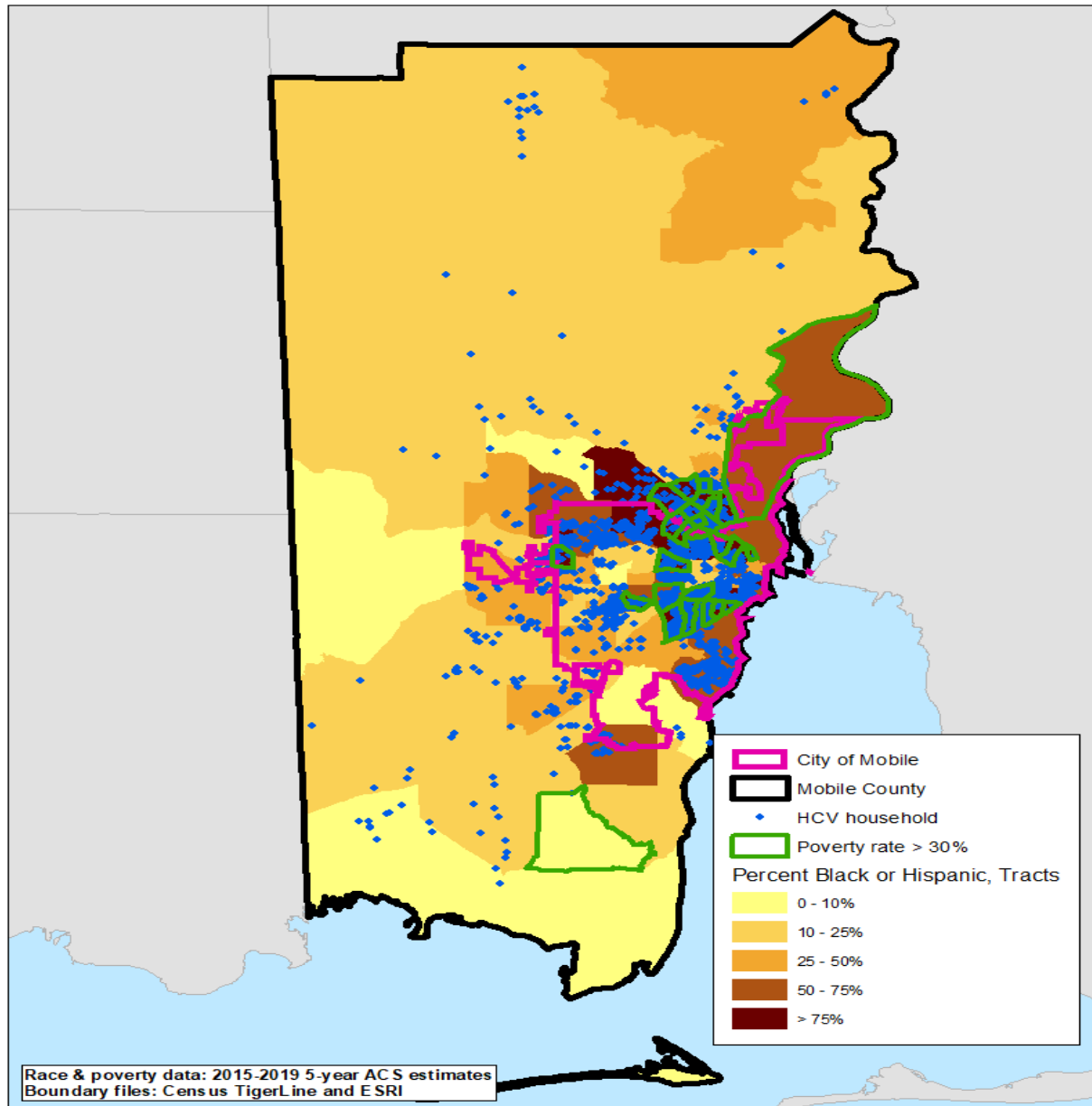
Map 2: High Poverty and non-Hispanic Black or Hispanic residents, census tracts, Mobile County



Mobile Housing Authority 2026-2030 5-Year and 2026 Annual Plan

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.

Map 3: Mobile Housing Authority Housing Choice Voucher units, poverty and race

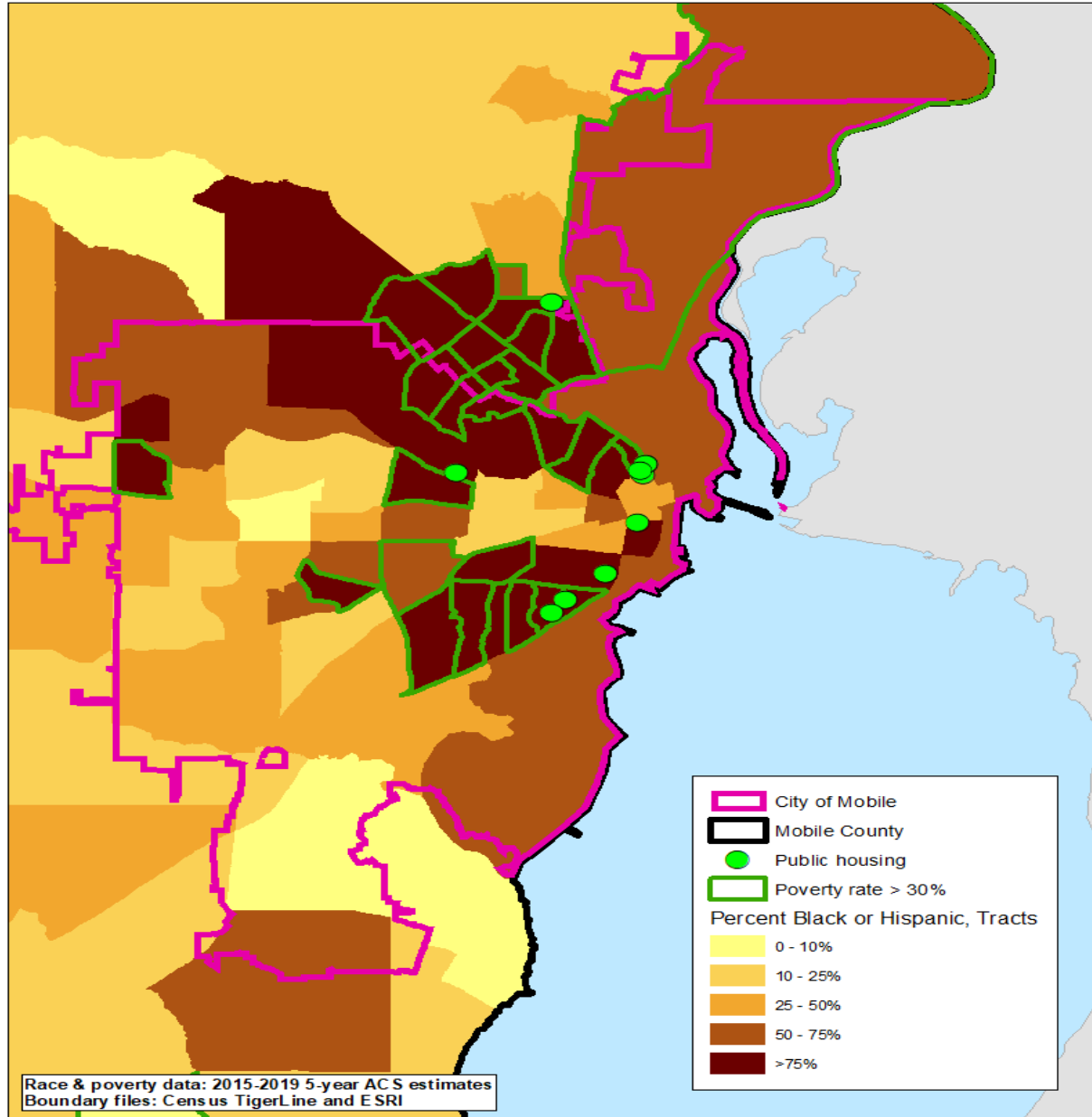


⁷ Map plots location of 4,056 MHA voucher units with, as of May 25th, 2021.

Mobile Housing Authority 2026-2030 5-Year and 2026 Annual Plan

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: <https://mobilehousing.org/housing-programs/affordable-housing>

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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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%.

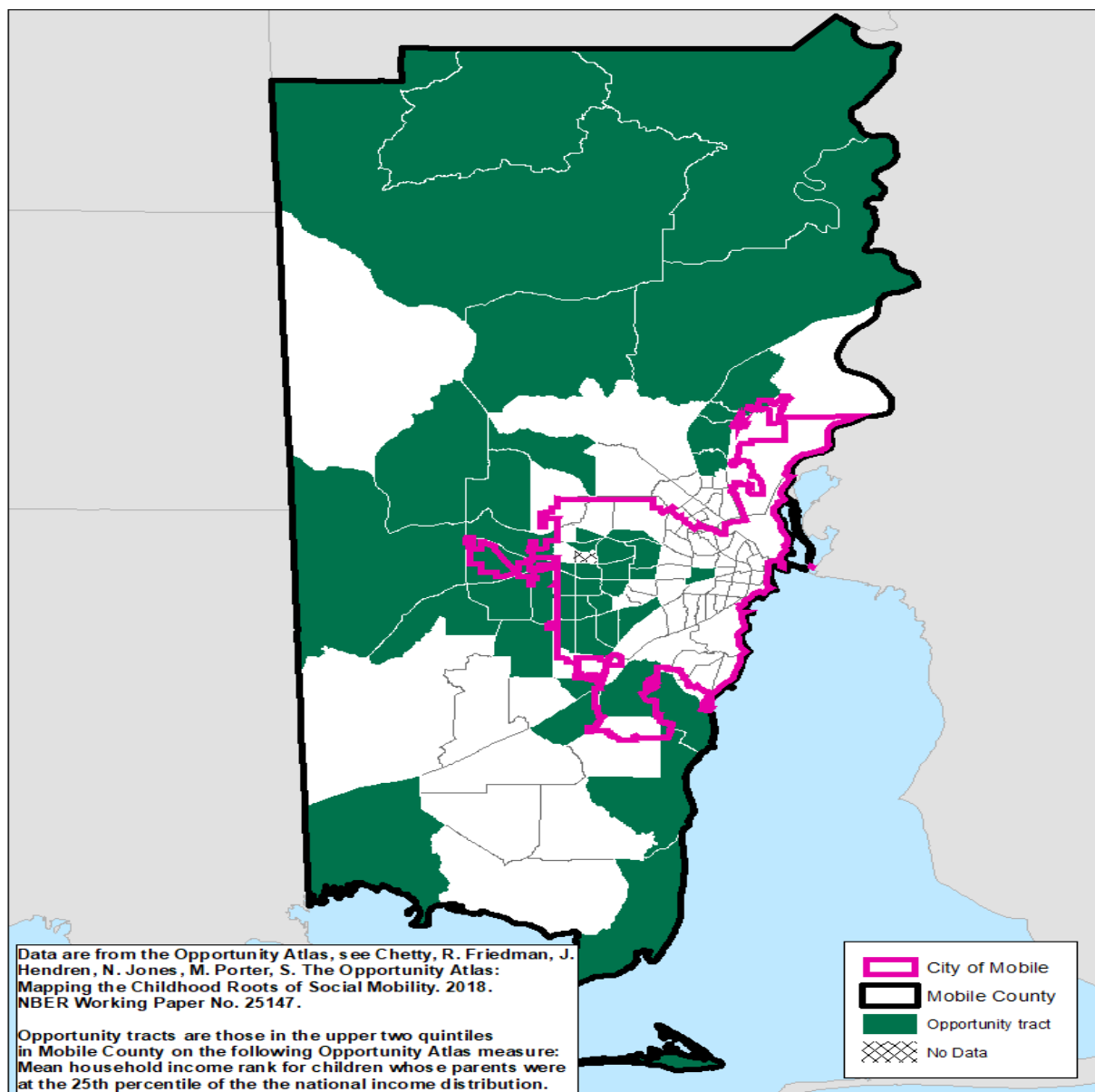
Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

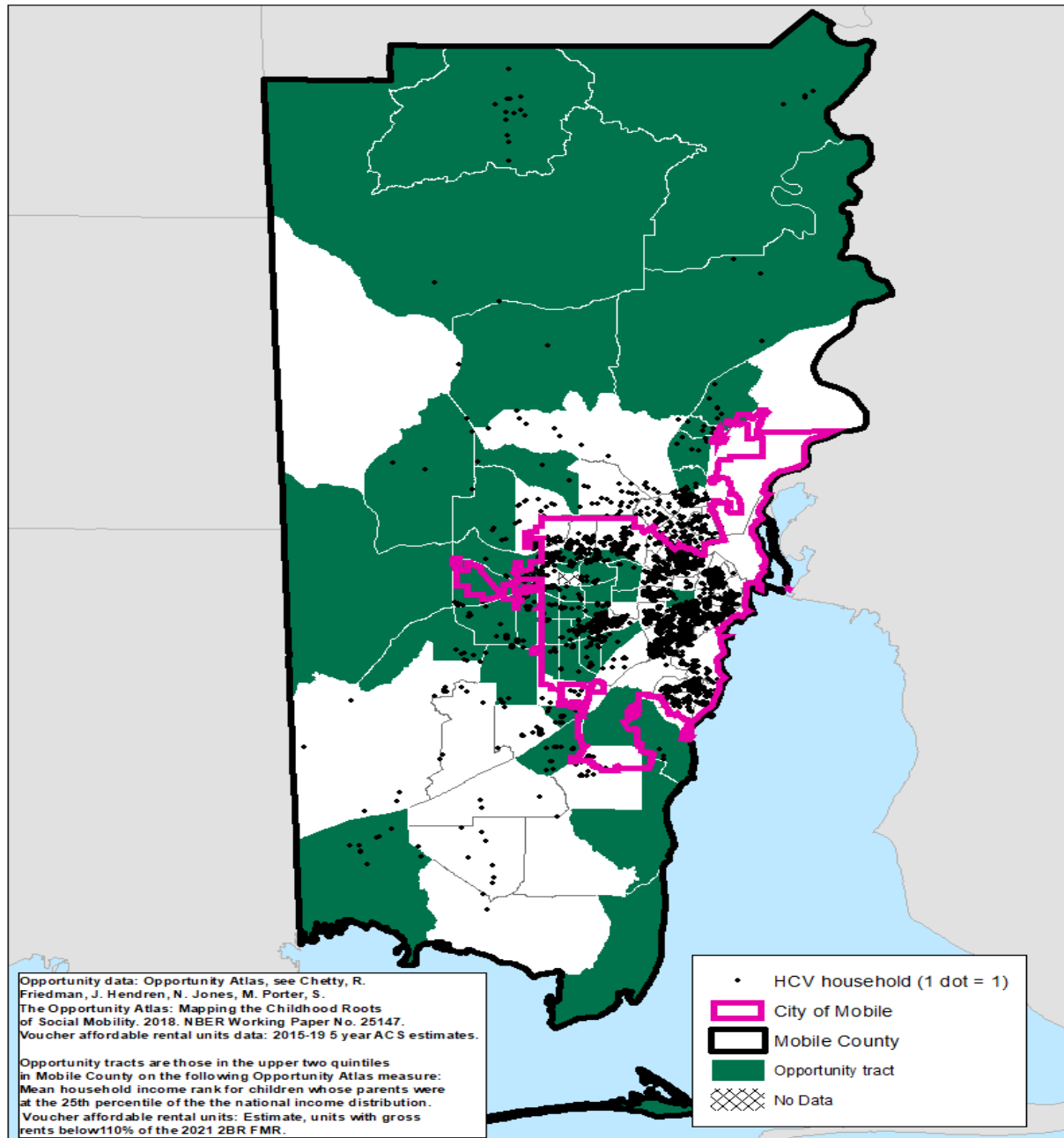
Map 5: Opportunity areas



Mobile Housing Authority 2026-2030 5-Year and 2026 Annual Plan

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).

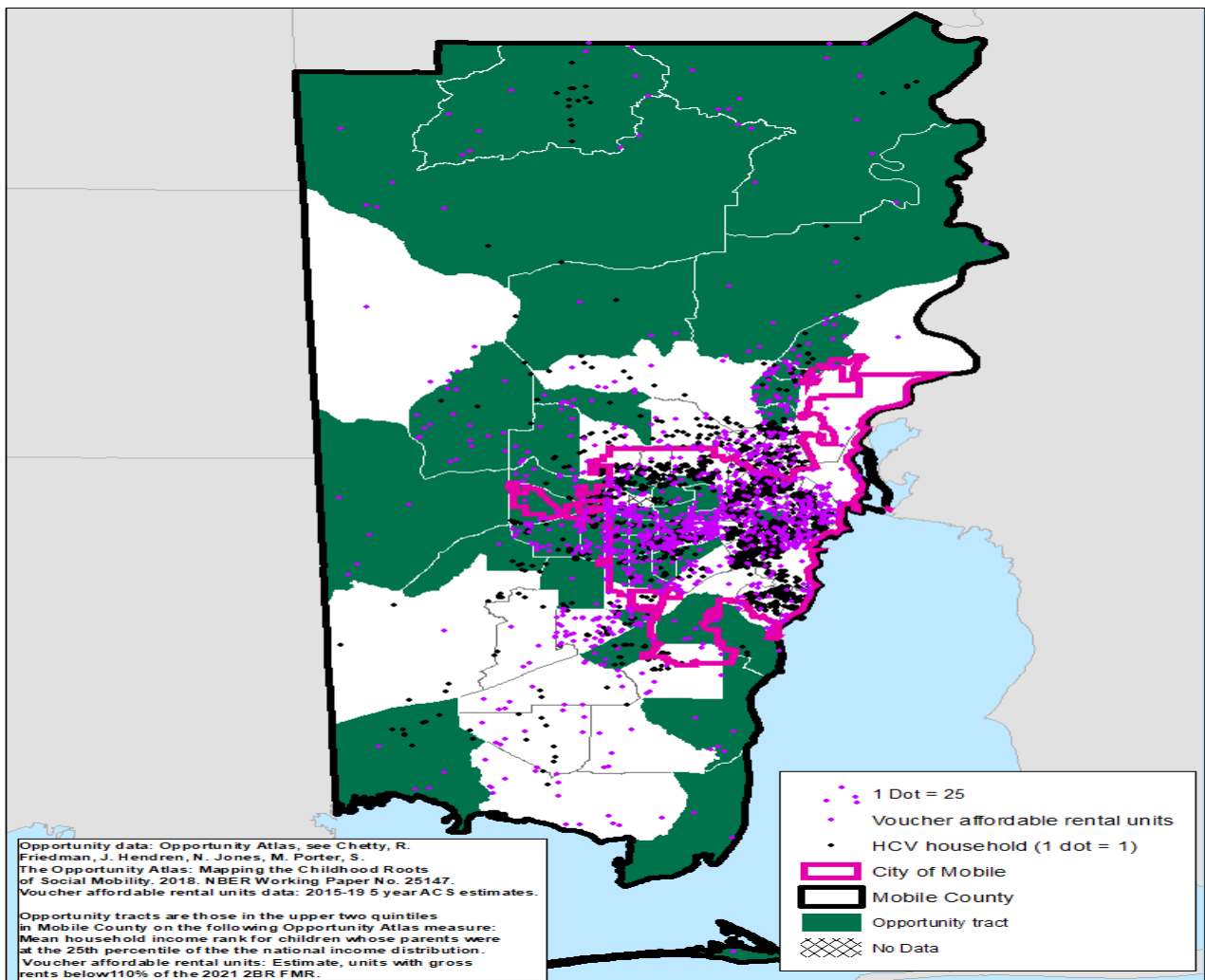
Map 6: MHA HCV units and opportunity areas



Mobile Housing Authority 2026-2030 5-Year and 2026 Annual Plan

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

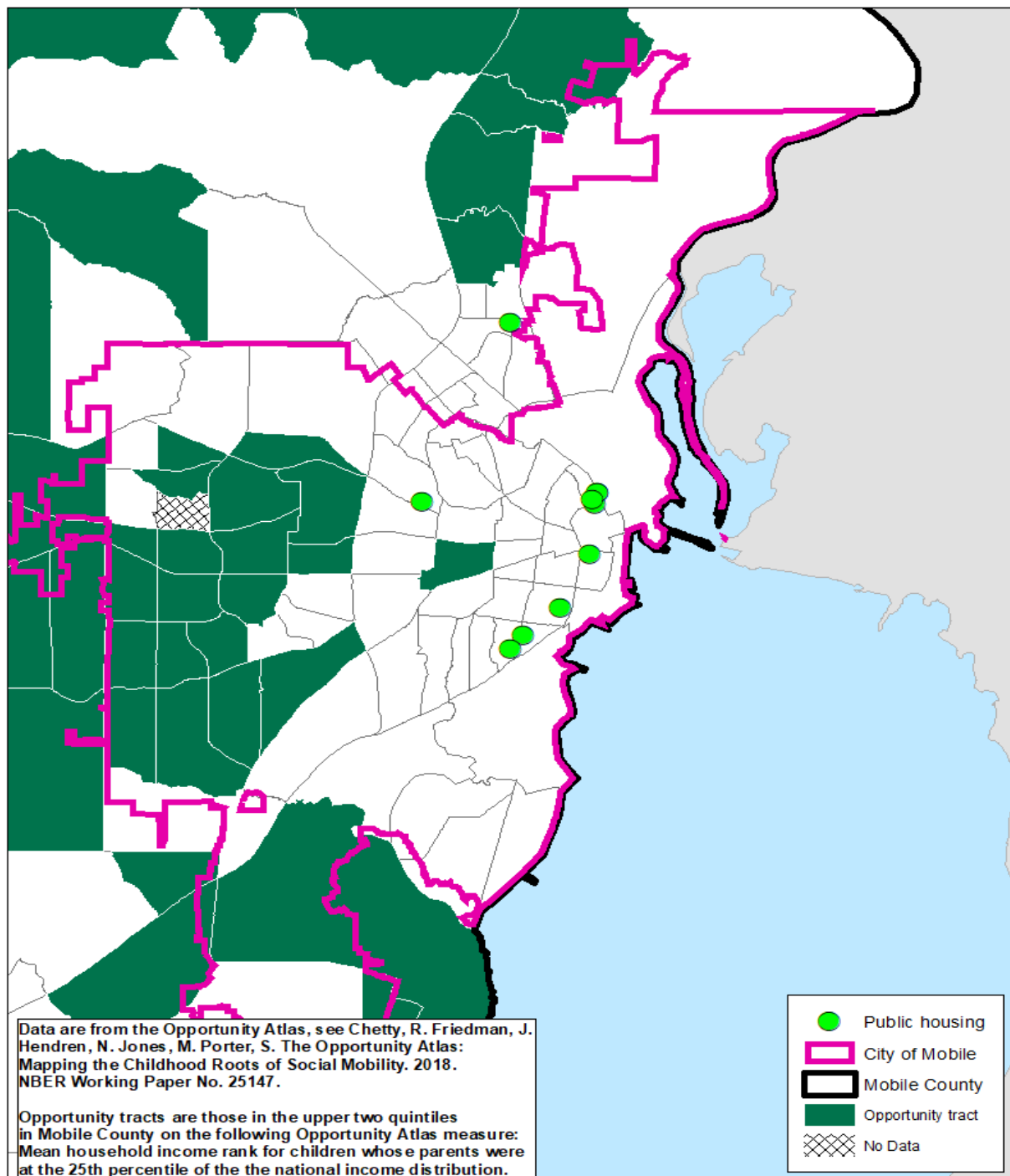
Map 7: MHA HCV units, Voucher-affordable rental units, and opportunity areas



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.

Mobile Housing Authority 2026-2030 5-Year and 2026 Annual Plan

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



Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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 renter-occupied 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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

B.2 New Activities

(a) See Template checkboxes

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 Renovation and Conversion to PBRA through RAD Closing and Start of Renovation Winter 2026			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Central Plaza Towers	AL02000012	PBRA	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) (465 X \$2, 952)
465	Senior	Same	\$1, 372, 678
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.)
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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Orange Grove Renovation and Conversion to PBV through RAD Start date of activity:2026 End date of activity: 2029			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
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 \$3, 188)
247	Family	Family	\$787, 387
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

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Oaklawn Homes Renovation and Conversion to PBV through RAD Start date of activity:2027 End date of activity: 2030			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
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 \$3, 211)
95	Family	Family	\$305, 026
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	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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Gulf Village Renovation and Conversion to PBV through RAD Start date of activity: 2028 End date of activity: 2031			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Gulf Village	AL02000006	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 \$3, 371)
199	Family	Family	\$670, 907
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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Emerson Gardens Renovation and Conversion to PBV through RAD Start date of activity:2025 End date of activity: 2028			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Emerson Gardens	AL020000013	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)(94 X \$3,198)
94	Senior	Senior	\$300, 584
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	86	86	
Two Bedroom	8	8	
Three Bedroom	0	0	
Non-Dwelling Units	0	0	

MHA does not yet have a individual CHAP on Emerson Gardens, but is in the process of applying for one and, it is 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 Emerson Gardens 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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

The Renaissance Family Renovation and Conversion to PBV through RAD Start date of activity: 2026 End date of activity: 2029			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Renaissance Family	AL020000021	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)(87 X \$2,199)
87	Family	Family	\$191,287
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	14	14	
Two Bedroom	33	33	
Three Bedroom	20	20	
Non-Dwelling Units	0	0	

MHA does not yet have a individual CHAP on Renaissance Family, and, it is part of an overall MHA Portfolio RAD CHAP.

MHA will the preferences already contained within its ACOP.

No transfer of assistance is planned at Renaissance Family 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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Renaissance Townhomes Renovation and Conversion to PBV through RAD Start date of activity: 2027 End date of activity: 2030			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Renaissance Townhomes	AL020000020	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)(48 X \$2,426
48	Family	Family	\$116,436
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	0	0	
Two Bedroom	15	15	
Three Bedroom	33	33	
Non-Dwelling Units	0	0	

MHA does not yet have a individual CHAP on Renaissance Townhomes, and, it is part of an overall MHA Portfolio RAD CHAP.

MHA will the preferences already contained within its ACOP.

No transfer of assistance is planned at Renaissance Townhomes 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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Downtown Renaissance Renovation and Conversion to PBV through RAD Start date of activity: 2028 End date of activity: 2031			
Name of Public Housing Project:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Renaissance Downtown	AL020000019	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)(57 X \$1,768)
57	Family	Family	\$100,799
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	47	47	
Two Bedroom	10	10	
Three Bedroom	0	0	
Non-Dwelling Units	0	0	

MHA does not yet have a individual CHAP on Renaissance Downtown, and, it is part of an overall MHA Portfolio RAD CHAP.

MHA will the preferences already contained within its ACOP.

No transfer of assistance is planned at Renaissance Downtown 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.

RAD conversion complies with all applicable site selection and neighborhood reviews and all appropriate RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA) procedures are being followed.

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. MHA will not ignore areas of historic poverty, specifically where major demolition and disposition activities are planned

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

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 renter-occupied 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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

B.3 Progress Report

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

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

MHA Strategic Goal No. 1: 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.

MHA Strategic Goal No. 2: 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 spirit 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.

MHA's Strategic Goal No. 3: 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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

- 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.

MHA Strategic Goal No. 4: 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.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

B.5 Most Recent Fiscal Year Audit

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

1. Financial Reporting
 1. Numerous adjustments, of which many were provided by management, were needed during the audit process to properly report financial statements in accordance with generally accepted accounting principles.
2. Eligibility (HCV Program)
 1. Tenant file deficiencies.

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

Section C.5 is answered in the template form itself.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section E. RAD Attachment

The Mobile Housing Authority is amending its Annual PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Mobile Housing Authority will be converting to Project Based Rental Assistance under the guidelines of H 2019-09/PIH 2019-23, REV-4 and any successor Notices. Upon conversion to Project Based Rental Assistance the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of H 2019-09/PIH 2019-23, REV-4; and H-2016-17/PIH-2016-17). These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Mobile Housing Authority certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Mobile Housing Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Mobile Housing Authority may also borrow funds to address their capital needs. The Mobile Housing Authority will also be contributing Capital Funds in the amount of \$500,000 in a refundable pre-development loan towards the conversion.

By way of summary and not as a modification of the program requirements set forth in the Notice provisions referenced below, please note that the foregoing tenant protections for RAD PBV residents apply to non-RAD PBV residents of the same Covered Project with the exception of Choice Mobility. Standard PBV Choice Mobility requirements apply to non-RAD PBV residents.

Project Based Rental Assistance Resident Rights, Participation, Waiting List and Grievance Procedure Requirements from Section 1.7 of Notice H 2019-09/PIH 2019-23, REV-4; and H-2016-17/PIH-2016-17 and the House Rules: Addendum A – Resident Procedural Rights are Listed Below.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

B. PBRA Resident Rights and Participation.

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.⁵¹ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBRA requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, the first clause of section 8(c)(4) of the Act and 24 CFR § 880.603(b), concerning determination of eligibility and selection of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. Further, so as to facilitate the right to return to the assisted property, this provision shall apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR § 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.⁵²
2. **Right to Return.** See section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return.
5. **Relocation Requirements.**
 - a. **RAD Fair Housing, Civil Rights, and Relocation Notice.** Relocation requirements related to public housing conversions under RAD are described in the RAD Fair Housing, Civil Rights, and Relocation Notice.¹¹ The RAD Fair Housing, Civil Rights, and Relocation Notice provides PHAs and their development partners with information and resources on RAD program requirements, Uniform Relocation Act (URA) requirements, and other requirements which may be applicable such as Section 104(d) of the Housing and Community Development Act of 1974, as amended (Section 104(d)) when planning for or implementing resident

¹¹ For properties being redeveloped with funding under a Choice Neighborhoods Implementation (CNI) grant, the RAD Fair Housing, Civil Rights, and Relocation Notice is superseded by requirements regarding relocation included in the applicable CNI NOFA and applicable CNI Grant Agreement.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

moves in connection with a RAD conversion under the First Component of RAD. Specifically, the RAD Fair Housing, Civil Rights, and Relocation Notice provides guidance on relocation planning, resident right to return, relocation assistance, resident notification, initiation of relocation, and the fair housing and civil rights requirements applicable to these activities.

The appendices to the RAD Fair Housing, Civil Rights, and Relocation Notice include recommended relocation plan contents. Sample relocation notices for issuance to residents depending on RAD project characteristics are available on the RAD website at www.hud.gov/rad. The primary source for First Component relocation requirements and guidance is the RAD Fair Housing, Civil Rights, and Relocation Notice and not this Notice. In the event of a conflict between this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice, with regard to relocation requirements, the RAD Fair Housing, Civil Rights, and Relocation Notice controls.

- b. Right to Return.** Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project's conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved (see [Section 1.4.A.12](#)), residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. For more information on how to implement these provisions see the RAD Fair Housing, Civil Rights, and Relocation Notice.

- 3. Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBRA program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the

⁵¹ These protections (as well as all protections in this Notice for current households) apply when a household is relocated to facilitate repairs following conversion and subsequently returns to the Covered Project, even if they are considered a "new admission" upon return.

⁵² For non-RAD PBV households, applicable program requirements includes the requirement that any admission to the project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

rent increase will be phased in over 3 or 5 years. Eligibility for the phase-in is to be determined at the Initial Certification which occurs at the time the household is converted to PBRA. A phase-in must not be applied after the household's Initial Certification. To implement the phase-in, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 880.201 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years, or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated Multifamily TTP" refers to the TTP calculated in accordance with regulations at 24 CFR § 5.628 (not capped at Gross Rent) and the "most recently paid TTP" refers to the TTP recorded on the family's most recent HUD Form 50059. If a family in a project converting from Public Housing to PBRA was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1, as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated Multifamily TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) in prior to Year 3 AR – 50% of difference between most recently paid TTP and Calculated Multifamily TTP
- Year 3: Year 3 AR and all subsequent recertifications – Year 3 AR and any IR in Year 3: Full Calculated Multifamily TTP⁵³

Five Year Phase-in

⁵³ For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TTP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated Multifamily TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and Calculated Multifamily TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and Calculated Multifamily TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and Calculated Multifamily TTP
- Year 5 AR and all subsequent recertifications – Full Calculated Multifamily TTP

Please Note: In either the three year phase-in or the five-year phase-in, once Calculated Multifamily TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full Calculated Multifamily TTP from that point forward

- 4. Family Self-Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program once their housing is converted under RAD. Through waiver in this Notice, FSS grant funds may be used to continue to serve such FSS participants. All Project Owners will be required to administer the FSS program or partner with another agency to administer the FSS program in accordance with the requirements of 24 CFR part 984, the participants' contracts of participation, and current and future guidance published by HUD for all FSS participants enrolled in the FSS program prior to RAD conversion. All Project Owners will be required to provide both service coordination and payments to escrow until the end of the Contract of Participation for each resident. To ensure that HAP payments are processed correctly, and until TRACS is modified, the Project Owner must notify MF_FSS@hud.gov that there are current FSS participants residing in the Covered Project and adhere to the escrow and reporting requirements in Notice H 2016-08. The Project Owner may enter into a Cooperative Agreement with the PHA (the grantee), allowing the PHA to continue to provide service coordination to RAD-affected PBRA participants until all have completed their Contracts according to 24 CFR § 984.303. The Project Owner must assume responsibility for the administrative duties associated with FSS such as calculating and crediting escrow and reporting. Ultimately, the new Project Owner is responsible for serving the RAD-affected FSS participants until the end of their CoPs. The owner is not required to enroll new participants, but may choose to run its own voluntary FSS program in accordance with Notice H 2016-08.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

At the completion of the FSS grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Future FSS NOFAs will identify eligible FSS participants. Until HUD implements provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act that expand eligibility for FSS to PBRA properties, only a PHA that continues to run an FSS program that serves public housing and/or HCV/PBV FSS participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding and may use that funding to serve public housing, HCV and/or RAD-affected PBRA FSS participants. However, if the PHA no longer has a public housing or HCV program, the PHA is not eligible to apply for FSS funding.

Upon conversion, if the PHA has closed out its public housing program in accordance with Notice PIH 2019-13, funds escrowed under the public housing program for FSS participants shall be transferred into the PBRA escrow account and be considered PBRA funds, thus reverting to PBRA if forfeited by the FSS participant.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants nor will its residents be eligible to be served by future ROSS-SC grants, as ROSS-SC, by statute, can serve only public housing residents. At the completion of the ROSS-SC grant, grantees should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be non-profits or local Resident Associations and this consequence of a RAD conversion may impact those entities.

5. **Resident Participation and Funding.** Residents of Covered Projects with assistance converted to PBRA will have the right to establish and operate a resident organization in accordance with 24 CFR part 245 (Tenant Participation in Multifamily Housing Projects). In addition, in accordance with Attachment 1B, residents will be eligible for resident participation funding.
6. **Resident Procedural Rights.** The information provided below must be included as part of the House Rules for the associated project and the House Rules must be submitted to HUD for review prior to Closing. See Attachment 1E for a sample Addendum to the House Rules.
 - a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease.

- i. *Termination of Tenancy and Assistance.* The termination procedure for RAD conversions to PBRA will additionally require that Project Owners provide adequate written notice of termination of the lease which shall be:
 1. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 2. Not less than 14 days in the case of nonpayment of rent; and
 3. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- ii. *Termination of Assistance.* In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease, and any other HUD multifamily administrative guidance shall apply.

- b. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD requires that:

- i. Residents be provided with notice of the specific grounds of the Project Owner's proposed adverse action, as well as their right to an informal hearing with the Project Owner;
- ii. Residents have an opportunity for an informal hearing with an impartial member of the Project Owner's staff within a reasonable period of time;
- iii. Residents have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the Project Owner as the basis for the adverse action. With reasonable notice to

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

- the Project Owner, prior to hearing and at the residents' own cost, residents may copy any documents or records related to the proposed adverse action; and
- iv. Project Owners provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action and the evidence the Project Owner relied on as the basis for the adverse action.

The Project Owner shall be bound by decisions from these hearings, except if (x) the hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing, or (y) the decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law. If the Project Owner determines that it is not bound by a hearing decision, the Project Owner must promptly notify the resident of this determination, and of the reasons for the determination.

- c. **Family Right to Move.** [Pursuant to Section 1.7.C.5](#) and unless the Covered Project received a specific good cause exemption to such provision, families have a choice-mobility right which must be stated in the House Rules as shown in sample in Attachment 1E.
- 7. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID exclusion after conversion, in accordance with regulations at 24 CFR § 960.255. After conversion, no other tenants will be eligible to receive the EID. If a tenant receiving the EID exclusion undergoes a break in employment, ceases to use the EID exclusion, or the EID exclusion expires in accordance with 24 CFR § 960.255, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR § 960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.
- 8. Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target project(s) under RAD will be able to finish out their Jobs Plus grant unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services offered at the target project that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements.

- 9. When Total Tenant Payment Exceeds Gross Rent.** Under the PBRA program, assisted families typically pay 30% of adjusted gross income toward rent and utilities, referred to as TTP. Under normal PBRA rules, a Project Owner must process a termination of assistance pursuant to section 8-5 C. of Housing Handbook 4350.3, REV-1 when the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent). In addition, section 8-6 A.1 provides that, when terminating a tenant's assistance, the owner is to increase the tenant rent to the contract rent (assuming that the tenant does not receive the benefit of any other type of subsidy).

For residents living in the Converting Project on the date of conversion and all new admissions to the Covered Project thereafter, when TTP equals or exceeds the contract rent plus any utility allowance, the Project Owner must charge a tenant rent equal to the lesser of (a) TTP (which is not capped at gross rent), less the utility allowance in the contract, or (b) any applicable maximum rent allowable under LIHTC regulations.⁵⁴ To this end, HUD is waiving sections 8-5 C. and 8-6 A. 1. of Housing Handbook 4350.3, REV-1. In such cases, the tenant will still be considered a Section 8 tenant and will still have the rights and be subject to the requirements of Section 8 tenants. Tenants will retain all of the rights under the Model Lease, including the right to occupy the unit, as well as those provided through this Notice, and tenants will still be subject to the requirements for Section 8 tenants, including the requirements concerning reexamination of family income and composition found in 24 CFR §§ 5.657 and 880.603(c). When TTP equals or exceeds Gross Rent, the excess rent collected by the owner is considered project funds and must be used for project purposes. Assistance may subsequently be reinstated if the Tenant becomes eligible for assistance. In the event that the tenant moves out, the Project Owner must select an applicant from the waiting list who meets the applicable income limits for the project.

⁵⁴ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities. Accordingly, the Project Owner must charge this resident \$550, i.e., \$600 TTP, minus \$50 Utility Allowance.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

The Project Owner is not required to process these individuals through Multifamily Housing's Tenant Rental Assistance Certification System (TRACS) but may be required to do so in the future when a future revision of the TRACS can accept such certifications. All normal actions for the contract rent shall continue for these units, including application of the OCAF adjustment to the contract rent indicated in the HAP Contract—since the OCAF adjusted rent will still be in effect whenever the unit is occupied by a family eligible for rental assistance.

- 10. Under-Occupied Units.** If at the time of conversion, an eligible family assisted under the HAP Contract is occupying a unit that is larger than appropriate because of the family's composition, the family may remain in the unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under-occupied unit must move to the appropriate-sized within a reasonable period of time. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, HUD is waiving the portion of 24 CFR § 880.605 that assumes the unit has become under-occupied as the result of a change in family size.

C. PBRA: Other Miscellaneous Provisions.

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
- 2. Davis-Bacon prevailing wages and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have been moved to [1.4.A.13](#) and [1.4.A.14](#).
- 3. Establishment of Waiting List.** The Project Owner can utilize a project-specific or community waiting list. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - a. Transferring an existing site-based waiting list to a new site-based waiting list.
 - b. Transferring an existing site-based waiting list to a PBRA program-wide waiting list.
 - c. Transferring an existing community-wide public housing waiting list to a PBRA program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

- d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

To the extent the wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁵⁵

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This allows for easier moves between assisted properties. Any such preference must be approved by HUD in accordance with Notice H 2013-21, prior to implementation.

⁵⁵ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 880.603 regarding selection and admission of assisted tenants. However, after the initial waiting list has been established, the Project Owner shall administer its waiting list for the Covered Project in accordance with 24 CFR § 880.603.

A Project Owner must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

4. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project.
5. **Choice-Mobility.** HUD seeks to provide all residents of Covered Projects with viable Choice-Mobility options. Unless provided an exemption as described below, PHAs that are applying to convert the assistance of a project to PBRA are required to provide a Choice-Mobility option to residents of Covered Projects in accordance with the following:⁵⁶
 - a. *Resident Eligibility.* Residents have a right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 24 months from date of effective date of the HAP or (b) 24 months after the move-in date.
 - b. *Voucher Inventory Turnover Cap.* Recognizing the limitation on the availability of turnover vouchers from year to year, a voucher agency would not be required, in any year, to provide more than one-third of its turnover vouchers to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received.
 - c. *Project Turnover Cap.* Also recognizing the limited availability of turnover vouchers and the importance of managing turnover in the best interests of the property, in any year, a Project Owner and voucher agency may agree to limit the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the project. (For example, if the project has 100 assisted units, the Project Owner and

⁵⁶ The Choice-Mobility requirements that apply to covered PBRA projects differ from the requirements that apply to covered PBV projects.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Section I: Public Housing Projects

voucher agency could limit the number of families exercising Choice-Mobility to 15 in any year, but not to less than 15.) While a Project Owner and voucher agency are not required to establish a project turnover cap, if such a cap is implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received.

The voucher agency must maintain a written agreement with the owner describing how the Choice-Mobility option will be administered in accordance with these requirements and the process by which households may request a voucher. For example, the written agreement must specify whether the owner will receive requests from families or refer families to the PHA.

HUD's goal is to have all residents in the Demonstration offered a Choice-Mobility option within a reasonable time after conversion. However, as HUD recognizes that not all voucher agencies will have vouchers sufficient to support this effort, HUD will take the following actions:

- Provide voucher agencies that make such a commitment bonus points provided under the Section Eight Management Assessment Program (SEMAP) for deconcentration.⁵⁷
- Grant a good-cause exemption from the Choice-Mobility requirement for no more than 10 percent of units in the Demonstration. HUD will consider requests for good-cause exemptions only from the following types of PHAs:
 - Public housing-only agencies, defined as agencies that own units under a public housing ACC, but do not administer, directly or through an affiliate, a Housing Choice Voucher program with non special-purpose vouchers; or
 - Combined agencies that currently have more than one-third of their turnover vouchers set aside for veterans, as defined for the purpose of HUD-VASH, or homeless populations, as defined in 24 CFR § 91.5.⁵⁸ To be eligible for this exemption, the PHA's admission policies must have

⁵⁷ The sponsoring agency must commit to the full term of the initial HAP Contract, must undergo a significant amendment to its Annual Plan (no later than 60 days after execution of the project's CHAP), and must comply with section 8(o)(6)(A) relating to selection preferences. In order to implement this incentive, HUD is waiving provisions under 24 CFR § 985.3(h) to provide donating agencies with bonus points under the SEMAP for deconcentration.

⁵⁸ A veteran is, for the purpose of HUD-VASH, a person who served in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable and is eligible for Veterans Administration health care.

been formally approved by the PHA's board prior to the time of application.

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Attachment 1E - House Rules: Addendum A – Resident Procedural Rights

The information provided below must be included as part of the House Rules for the associated project and evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease.
 - i. *Termination of Tenancy and Assistance.* The termination procedure for RAD conversions to PBRA will additionally require that Project Owners provide adequate written notice of termination of the lease which shall not be less than:
 - 1. A reasonable period of time, but not to exceed 30 days:
 - a. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - b. In the event of any drug-related or violent criminal activity or any felony conviction; or
 - 2. Not less than 14 days in the case of nonpayment of rent; and
 - 3. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
 - ii. *Termination of Assistance.* In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease, and any other HUD multifamily administrative guidance shall apply.
- b. **Grievance Process.** In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility allowances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:
 - i. Residents be provided with written notice of the specific grounds of the Project Owner's proposed adverse action, as well as their right to an informal hearing with the Project Owner;
 - ii. Residents will have an opportunity for an informal hearing with an impartial member of the Project Owner's staff within a reasonable period of time;
 - iii. Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others make statements at the hearing, and to examine any regulations and any evidence relied upon by the Project

Mobile Housing Authority

2026-2030 5-Year and 2026 Annual Plan

Attachment 1E: House Rules Addendum for PBRA Conversions

- Owner as the basis for the adverse action. With reasonable notice to the Project Owner, prior to hearing and at the residents' own cost, resident may copy any documents or records related to the proposed adverse action; and
- iv. Project Owners provide the resident with a written decision within a reasonable period of time stating the grounds for the adverse action, and the evidence the Project Owner relied on as the basis for the adverse action.

The Project Owner will be bound by decisions from these hearings, except if the:

- i. Hearing concerns a matter that exceeds the authority of the impartial party conducting the hearing.
- ii. Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.

If the Project Owner determines that it is not bound by a hearing decision, the PHA must promptly notify the resident in writing of this determination, and of the reasons for the determination.

- c. **Family Right to Move.** [Do not include this provision if HUD provided to the Covered Project a good-cause exemption from Choice Mobility as described in Section 1.7.5.] Each family has the option to obtain tenant-based rental assistance (commonly known as a Housing Choice Voucher) from [name of the PHA], subject to certain program limitations, at any time after the second year of occupancy. Before providing notice to terminate the lease, the family must first contact the PHA to request tenant-based rental assistance if the family wishes to move with continued assistance. If tenant-based rental assistance is not immediately available, the PHA shall give the family priority to receive the next available opportunity for tenant-based rental assistance. After the PHA offers the family the opportunity for tenant-based rental assistance in accordance with HUD requirements and after the family has secured a lease with such tenant-based rental assistance, the family must give the owner advance written notice of intent to vacate (with a copy to the PHA) in accordance with the lease.