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

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

**Definitions.**

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

## A. PHA Information.

**A.1**

**PHA Name**: Mobile Housing Authority **PHA Code**: AL002

**PHA Type:** ☑ Standard PHA ☐ Troubled PHA

**PHA Plan for Fiscal Year Beginning**: (MM/YYYY): 01/2027

**PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)

**Number of Public Housing (PH) Units** 1292 **Number of Housing Choice Vouchers (HCVs)** 4775

**Total Combined Units/Vouchers** 6067

**PHA Plan Submission Type:** ☑ Annual Submission ☐ Revised Annual Submission

**Public Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans.

Mobile Housing Authority's Central Office located at 151 S. Claiborne Street, Mobile, AL 36602, by appointment only during the hours of 10:00 am - 3:00 pm.

Mobile Housing Authority's Management Office Locations by appointment only during the hours of 10:00 am - 3:00 pm:

- Central Plaza Towers, 300 Bayshore Avenue, Mobile, AL 36607
- Downtown Renaissance, 350 Bloodgood Street, Mobile, AL 36603
- Emerson Gardens, 759 Palmetto Street, Mobile, AL 36603
- Gulf Village Homes, 2002 Ball Avenue, Prichard, AL 36610
- Oaklawn Homes, 1010 Baltimore Street, Mobile, AL 36605
- Orange Grove Homes, 600 N Joachim Street, Mobile, AL 36603
- The Renaissance/Renaissance Gardens, 474 Bloodgood Street, Mobile, AL 36603
- Housing Choice Voucher Program Administrative Office, 110 Beauregard Street, Suite 106 Mobile, AL 36602
- Mobile Housing Authority Website at www.mobilehousing.org

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

| Participating PHAs | PHA Code | Program(s) in the Consortia | Program(s) not in the Consortia | No. of Units in Each Program | |
|---|---|---|---|---|---|
| | | | | PH | HCV |
| Lead PHA: | | | | | |
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## B. Plan Elements

**B.1 Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

| Y | N | |
|---|---|---|
| ☑ | ☐ | Statement of Housing Needs and Strategy for Addressing Housing Needs. |
| ☑ | ☑ | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| ☑ | ☐ | Financial Resources. |
| ☐ | ☑ | Rent Determination. |
| ☐ | ☑ | Operation and Management. |
| ☐ | ☑ | Grievance Procedures. |
| ☐ | ☑ | Homeownership Programs. |
| ☐ | ☑ | Community Service and Self-Sufficiency Programs. |
| ☐ | ☑ | Safety and Crime Prevention. |
| ☐ | ☑ | Pet Policy. |
| ☐ | ☑ | Asset Management. |
| ☐ | ☑ | Substantial Deviation. |
| ☐ | ☑ | Significant Amendment/Modification. |

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

See 2027 Plan Attachment Section B.1

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

See 2027 Plan Attachment Section B.1

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

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

See 2027 Plan Attachment Section B.2

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| B.3 | **Progress Report.**<br><br>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.<br>See 2027 Plan Attachment Section B.3 |
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| **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.<br>Mobile Housing Authority's most recent 5 Year Action Plan was approved May 11, 2026. |
| **B.5** | **Most Recent Fiscal Year Audit**.<br><br>(a) Were there any findings in the most recent FY Audit?<br><br>Y N<br>☐ ☑<br><br>(b) If yes, please describe: |
| **C.** | **Other Document and/or Certification Requirements.** |
| **C.1** | **Resident Advisory Board (RAB) Comments.**<br><br>(a) Did the RAB(s) have comments to the PHA Plan?<br><br>Y N<br>☐ ☐<br><br>(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. |

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| **C.2** | **Certification by State or Local Officials.**<br><br>Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.<br>Please see attachment Section C.2 |
| **C.3** | **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.**<br><br>Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations*<br>*Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan.<br><br>Please see attachment Section C.3 |
| **C.4** | **Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.<br><br>(a) Did the public challenge any elements of the Plan?<br><br>Y N<br>☐ ☑<br><br>(b) If yes, include Challenged Elements. |

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| **C.5** | **Troubled PHA.**<br>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?<br>Y N N/A<br>☐ ☑ ☐<br><br>(b) If yes, please describe: |

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

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

**A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and Number of HCVs, PHA Plan Submission Type**, and the **Public Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(e)).

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

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

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

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

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

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

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

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

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

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

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

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

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

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities (24 CFR 903.7(m)). Note: All coordination and activities must be consistent with federal civil rights obligations. A description of: (**1**) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to survivors of domestic violence, dating violence, sexual assault, or stalking; (**2**) Any activities, services, or programs provided or offered by a PHA that helps survivors of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and (**3**) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance survivor safety in assisted families (24 CFR 903.7(m)(5)).

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

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

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

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)). For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH 2019-23(HA), successor RAD Implementation Notices, or other RAD Notices.

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

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

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

☐ **Choice Neighborhoods Grants.** **(1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Choice Neighborhoods Grants; and (**2)** A timetable for the submission of applications or proposals. The application and approval process for Choice Neighborhoods is a separate process. See guidance on HUD's website at: https://www.hud.gov/cn (Notice PIH 2011-47).

☐ **Modernization or Development (Conventional & Mixed-Finance).** **(1)** A description of any Public Housing (including name, project number (if known) and unit count) for which the PHA will apply for modernization or development; and (**2**) A timetable for the submission of applications or proposals. The application and approval process for modernization or development is a separate process. (See 24 CFR part 905 and guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4).

☐ **Demolition and/or Disposition.** With respect to public housing only, (1) describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) a timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/ and 24 CFR 903.7(h).

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

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe **(1)** any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **(2)** an analysis of the projects or buildings required to be converted under Section 33; and (**3**) a statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at the Special Applications Center (SAC) (https://www.hud.gov/sac) and 24 CFR 903.7(j).

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program (including Faircloth to RAD).** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. Note that all PHAs shall be required to provide the information listed in Attachment 1D of Notice PIH 2019-23(HA) as a significant amendment or its successor notice. See additional guidance on HUD's website at: https://www.hud.gov/RAD/library/notices.

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

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty day notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. (See additional guidance on HUD's website at: Notice PIH-2021-35 (24 CFR 960.503) (24 CFR 903.7(b)).

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2021-35. (24 CFR 960.505) (24 CFR 903.7(b)) NOTE: All activities must be consistent with civil rights laws – including ensuring that it does not have a disparate impact on protected class groups based on race, color, religion, national origin, sex (including sexual orientation), familial status, and disability.

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

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 24 CFR 983.55(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r)).

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

☐ **Other Capital Grant Programs** (i.e., Capital Fund Lead Based Paint, Housing Related Hazards, At Risk/Receivership/Substandard/Troubled Program, and/or Emergency Safety and Security Grants).

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

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan (24 CFR 903.7(s)(1)).

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR 903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

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

**C. Other Document and/or Certification Requirements.**

**C.1 Resident Advisory Board (RAB) comments**. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).

**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR 903.15). **Note:** A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.**3 **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 et. seq., 24 CFR 903.7(o)(1), and 903.15.

**C.4 Challenged Elements**. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A" (24 CFR 903.9).

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

Public reporting burden for this information collection is estimated to average 5.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

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MHA
Mobile Housing Authority
Accommodate | Illuminate | Elevate

# 2027 Annual Plan Attachment
# Section Narratives






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# 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):

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

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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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 1244 | | |
| Extremely low income <=30% AMI | 135 | 10.9% | |
| Very low income (>30% but <=50% AMI) | 19 | 1.5% | |
| Low income (>50% but <80% AMI) | 6 | 0.5% | |
| Families with children | 614 | 49.4% | |
| Elderly families | 64 | 5.1% | |
| Families with Disabilities | 187 | 15.0% | |
| Race/ethnicity (White) | 140 | 11.3% | |
| Race/ethnicity (Black) | 1126 | 90.5% | |
| Race/ethnicity (Asian/Other) | 39 | 3.1% | |
| Race/ethnicity (Hispanic) | 22 | 1.8% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 600 | 48.2% | |
| 2 BR | 376 | 30.2% | |
| 3 BR | 268 | 21.5% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 1728 | | |
| Extremely low income <=30% AMI | 113 | 6.5% | |
| Very low income (>30% but <=50% AMI) | 21 | 1.2% | |
| Low income (>50% but <80% AMI) | 4 | 0.2% | |
| Families with children | 842 | 48.7% | |
| Elderly families | 95 | 5.5% | |
| Families with Disabilities | 261 | 15.1% | |
| Race/ethnicity (White) | 144 | 8.3% | |
| Race/ethnicity (Black) | 1616 | 93.5% | |
| Race/ethnicity (Asian/Other) | 54 | 3.1% | |
| Race/ethnicity (Hispanic) | 25 | 1.5% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 815 | 47.2% | |
| 2 BR | 559 | 32.4% | |
| 3 BR | 354 | 20.5% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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Waitlist: AMP06WL

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

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of 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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 1362 | | |
| Extremely low income <=30% AMI | 167 | 12.3% | |
| Very low income (>30% but <=50% AMI) | 16 | 1.2% | |
| Low income (>50% but <80% AMI) | 6 | 0.4% | |
| Families with children | 715 | 52.5% | |
| Elderly families | 55 | 4.0% | |
| Families with Disabilities | 201 | 14.8% | |
| Race/ethnicity (White) | 145 | 10.7% | |
| Race/ethnicity (Black) | 1247 | 91.6% | |
| Race/ethnicity (Asian/Other) | 42 | 3.1% | |
| Race/ethnicity (Hispanic) | 24 | 1.8% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 596 | 43.8% | |
| 2 BR | 478 | 35.1% | |
| 3 BR | 288 | 21.2% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

Waitlist: 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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 123 | | |
| Extremely low income <=30% AMI | 15 | 12.2% | |
| Very low income (>30% but <=50% AMI) | 1 | 0.8% | |
| Low income (>50% but <80% AMI) | 2 | 1.6% | |
| Families with children | 0 | 0.0% | |
| Elderly families | 123 | 100.0% | |
| Families with Disabilities | 64 | 52.0% | |
| Race/ethnicity (White) | 29 | 23.6% | |
| Race/ethnicity (Black) | 92 | 74.8% | |
| Race/ethnicity (Asian/Other) | 2 | 1.6% | |
| Race/ethnicity (Hispanic) | 5 | 4.1% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 107 | 87.0% | |
| 2 BR | 16 | 13.0% | |
| 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)? [X] No [ ] Yes If yes:

How long has it been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

Waitlist: AMP13WL

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

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of 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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 115 | | |
| Extremely low income <=30% AMI | 21 | 18.3% | |
| Very low income (>30% but <=50% AMI) | 8 | 7.0% | |
| Low income (>50% but <80% AMI) | 0 | 0.0% | |
| Families with children | 0 | 0.0% | |
| Elderly families | 115 | 100.0% | |
| Families with Disabilities | 63 | 54.8% | |
| Race/ethnicity (White) | 8 | 7.0% | |
| Race/ethnicity (Black) | 108 | 93.9% | |
| Race/ethnicity (Asian/Other) | 3 | 2.6% | |
| Race/ethnicity (Hispanic) | 1 | 0.9% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 113 | 98.3% | |
| 2 BR | 2 | 1.7% | |
| 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)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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Waitlist: AMP19LI

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

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of 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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 137 | | |
| Extremely low income <=30% AMI | 36 | 26.3% | |
| Very low income (>30% but <=50% AMI) | 12 | 8.8% | |
| Low income (>50% but <80% AMI) | 1 | 0.7% | |
| Families with children | 0 | 0.0% | |
| Elderly families | 136 | 99.3% | |
| Families with Disabilities | 71 | 51.8% | |
| Race/ethnicity (White) | 11 | 8.0% | |
| Race/ethnicity (Black) | 125 | 91.2% | |
| Race/ethnicity (Asian/Other) | 3 | 2.2% | |
| Race/ethnicity (Hispanic) | 0 | 0.0% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 134 | 97.8% | |
| 2 BR | 3 | 2.2% | |
| 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)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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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)

☐ Section 8 tenant-based assistance
☐ **Public Housing**
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 179 | | |
| Extremely low income <=30% AMI | 54 | 30.2% | |
| Very low income (>30% but <=50% AMI) | 14 | 7.8% | |
| Low income (>50% but <80% AMI) | 1 | 0.6% | |
| Families with children | 0 | 0.0% | |
| Elderly families | 178 | 99.4% | |
| Families with Disabilities | 99 | 55.3% | |
| Race/ethnicity (White) | 13 | 7.3% | |
| Race/ethnicity (Black) | 165 | 92.2% | |
| Race/ethnicity (Asian/Other) | 3 | 1.7% | |
| Race/ethnicity (Hispanic) | 0 | 0.0% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 174 | 97.2% | |
| 2 BR | 5 | 2.8% | |
| 3 BR | 0 | 0.0% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

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Waitlist: AMP20WL

## 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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 1231 | | |
| Extremely low income <=30% AMI | 117 | 9.5% | |
| Very low income (>30% but <=50% AMI) | 19 | 1.5% | |
| Low income (>50% but <80% AMI) | 11 | 0.9% | |
| Families with children | 1128 | 91.6% | |
| Elderly families | 14 | 1.1% | |
| Families with Disabilities | 73 | 5.9% | |
| Race/ethnicity (White) | 89 | 7.2% | |
| Race/ethnicity (Black) | 1159 | 94.2% | |
| Race/ethnicity (Asian/Other) | 35 | 2.8% | |
| Race/ethnicity (Hispanic) | 21 | 1.7% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 0 | 0.0% | |
| 2 BR | 705 | 57.3% | |
| 3 BR | 526 | 42.7% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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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)

- [ ] Section 8 tenant-based assistance
- [X] **Public Housing**
- [ ] Combined Section 8 and Public Housing
- [ ] Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
  If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 2197 | | |
| Extremely low income <=30% AMI | 231 | 10.5% | |
| Very low income (>30% but <=50% AMI) | 47 | 2.1% | |
| Low income (>50% but <80% AMI) | 19 | 0.9% | |
| Families with children | 1184 | 53.9% | |
| Elderly families | 132 | 6.0% | |
| Families with Disabilities | 314 | 14.3% | |
| Race/ethnicity (White) | 164 | 7.5% | |
| Race/ethnicity (Black) | 2061 | 93.8% | |
| Race/ethnicity (Asian/Other) | 61 | 2.8% | |
| Race/ethnicity (Hispanic) | 32 | 1.5% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 940 | 42.8% | |
| 2 BR | 711 | 32.4% | |
| 3 BR | 546 | 24.9% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **04/06/2026**

How long has it been closed (# of months)? **3**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

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Waitlist: CHPPBV

## 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)

☐ Section 8 tenant-based assistance
☐ **Public Housing**
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing
If used, identify which development/sub-jurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 971 | | |
| 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 | 785 | 80.8% | |
| Elderly families | 13 | 1.3% | |
| Families with Disabilities | 67 | 6.9% | |
| Race/ethnicity (White) | 74 | 7.6% | |
| Race/ethnicity (Black) | 914 | 94.1% | |
| Race/ethnicity (Asian/Other) | 26 | 2.7% | |
| Race/ethnicity (Hispanic) | 16 | 1.7% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 135 | 13.9% | |
| 2 BR | 580 | 59.7% | |
| 3 BR | 256 | 26.4% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: **11/25/2024**

How long has it been closed (# of months)? **20**

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

Waitlist: HCV

## 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)

[X] Section 8 tenant-based assistance

[ ] **Public Housing**

[ ] Combined Section 8 and Public Housing

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

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 1191 | | |
| Extremely low income <=30% AMI | 366 | 30.7% | |
| Very low income (>30% but <=50% AMI) | 0 | 0.0% | |
| Low income (>50% but <80% AMI) | 0 | 0.0% | |
| Families with children | 771 | 64.7% | |
| Elderly families | 48 | 4.0% | |
| Families with Disabilities | 58 | 4.9% | |
| Race/ethnicity (White) | 79 | 6.6% | |
| Race/ethnicity (Black) | 1123 | 94.3% | |
| Race/ethnicity (Asian/Other) | 24 | 2.0% | |
| Race/ethnicity (Hispanic) | 12 | 1.0% | |
| | | | |
| Characteristics by Bedroom Size (PH Only) | | | |
| 1 BR | 0 | 0.0% | |
| 2 BR | 0 | 0.0% | |
| 3 BR | 0 | 0.0% | |
| 4 BR | 0 | 0.0% | |
| 5 BR | 0 | 0.0% | |
| 5+ BR | 0 | 0.0% | |

Is the waiting list closed (select one)? [X] No [ ] Yes If yes: **07/25/2024**

How long has it been closed (# of months)? **24**

Does the PHA expect to reopen the list in the PHA Plan year? [ ] No [ ] Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? [ ] No [ ] Yes

**1.Strategy for Addressing Housing Need.**

To address the housing needs of the families and individuals living within our jurisdiction and those on the waiting lists, some of the strategies MHA will strive to employ are as follows:

**1.** Continue to actively market our public housing units to elderly families, disabled families and all other families.
**2.** Continue to actively market our public housing units and the Housing Choice Voucher (HCV)/Section 8 Program to all race and ethnic groups residing within our jurisdiction and surrounding area.
**3.** Continue to make reasonable on-demand accessible modifications as a reasonable accommodation to disabled families in our public housing units.
**4.** Investigate ways to seek alternative funding through non-HUD grant opportunities.
**5.** Continue to maintain the apartment buildings and grounds and keep them in excellent condition.
**6.** Continue to maintain low vacancy rates and turnaround time so that affordable housing remains readily available.

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:

1. The Low-Income Housing Tax Credit program ("LITHC") administered by the Alabama Housing Finance Agency ("AHFA"),
2. Section 18 Demolition/Disposition protocols under HUD rules,
3. The Rental Assistance Demonstration (RAD) Program
4. MHA plans to issue project-based vouchers to help support the development of new affordable housing, as funding permits.

MHA also plans 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:

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**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 Services.

**Economic and Self-Sufficiency Programs**

Mobile Housing Authority (MHA) coordinates, promotes, and provides programs designed to enhance the economic independence, housing stability, and overall well-being of Public Housing (LIPH) residents and Housing Choice Voucher (HCV) participants. Services are delivered through Resident Services staff and a network of community partners.

**Resident Opportunity and Self-Sufficiency (ROSS) Service Coordinator Grant.**

The Mobile Housing Authority was awarded a three-year Resident Opportunity and Self-Sufficiency (ROSS) Service Coordinator Grant to expand supportive services for Public Housing residents. The grant funds two full-time Service Coordinators who provide comprehensive case management, needs assessments, individualized service planning, referrals, follow-up, and coordination of community resources.

Services include employment and career development, workforce training and apprenticeships, adult education, GED and postsecondary education, financial capability, budgeting and credit building, homeownership referrals, health and wellness services, behavioral health referrals, senior services and aging-in-place supports, youth development, digital literacy, transportation assistance, and community partnerships.

**Family Self-Sufficiency (FSS) Grant.**

The Mobile Housing Authority administers the HUD Family Self-Sufficiency (FSS) Program through its annual FSS Coordinator grant, which currently funds three full-time FSS Coordinators serving both Housing Choice Voucher and Public Housing participants.

The FSS Program provides individualized case management, goal planning through Contracts of Participation, escrow savings opportunities tied to earned income increases, employment and career advancement services, education and vocational training, financial capability and asset-building, credit improvement, homeownership preparation and referrals, and community resource coordination. The current grant supports serving up to 125 participating families while maintaining compliance with HUD's mandatory participation requirements.

| Economic and Self Sufficiency Programs | | | | |
|---|---|---|---|---|
| **Program Name and Description** | **Estimated Capacity** | **Allocation Method** | **Access** | **Eligibility** |
| **HCV FSS** | 58+ | Voluntary enrollment; participant recruitment and referrals | Resident Services | Housing Choice Voucher |
| **PH FSS** | 41+ | Voluntary enrollment; participant recruitment and referrals | Resident Services | Public Housing |
| **Employment Education, Workforce Development, and Job Training** | 300 | Referrals through Resident Services and community partners | Resident Services | Public Housing & Housing Choice Voucher |
| **ROSS Service Coordination Program** | 170 | Referrals and Resident Outreach | Resident Services | Public Housing |

## Family Self Sufficiency ("FSS") Participation Programs

| Program | **HUD Mandatory Minimum Participation** | **Actual Number of Participants (As of: 7/13/2026)** |
|---|---|---|
| **Public Housing** | 20 | 41 |
| **Housing Choice Voucher** | 24 | 58 |
| **Total** | 44 | 99 |

## B.1b (2) Statement of Financial Resources

**MOBILE HOUSING AUTHORITY**
**FY 2027 PLANNED FINANCIAL RESOURCES**

MHA' s statement of estimated or anticipated financial resources, by general categories, as referenced in Section 6.2 of this FY2027 Annual Plan is set forth below:

| | | |
|---|---|---|
| | **MOBILE HOUSING AUTHORITY** | |
| | **FY 2027 PLANNED FINANCIAL RESOURCES** | |
| | **ANNUAL PLAN** | |
| | | **FY 2027** |
| | **Sources** | **Planned $** |
| **1.** | **Federal Grants (FY 2026 and 2027):** | |
| | a. Public Housing Operating Fund | 8,500,000 |
| | b. Public Housing Capital Fund | 3,300,000 |
| | c. Housing Choice Voucher Program (Section 8) | 42,500,000 |
| | d. Mainstream Five Housing Voucher Program | 0 |
| | e. Emergency Housing Voucher Program | 0 |
| **2.** | **Prior Yr- Unobligated (remaining unspent balances)** | |
| | a. Public Housing Capital Fund | 23,708,368 |
| **3.** | **Public Housing Dwelling Rental Income** | |
| | a. Dwelling Rental Income | 2,400,000 |
| **4.** | **Other Income** | |
| | a. Miscellaneous Income | 645,000 |
| | **TOTAL FINANCIAL RESOURCES - FY 2026 and 2027** | **81,053,368** |

## 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 FY2027 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 2026-2030 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.

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

MHA Policy

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

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

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

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

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

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by MHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and MHA strategic objectives

 

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

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

MHA Policy

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

**Deconcentration Rule**

A. Objective:

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

B. Exemptions:

The following are exempt from this rule.

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

C. Actions:

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

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 10, 2026

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 $15, 620

2. Gulf Village $12, 926
   Total $28, 546
   Average $14, 273

The average annual income of all covered developments ($14, 273) was used to determine the Established Income Range (EIR): 85% to 115% of $14, 273 or $12132.05 to $16, 413.95.

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.

### 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<br>Conversion to PBRA through RAD<br>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 |

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<br>Start date of activity:2026<br>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)<br>(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

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<br>Start date of activity:2027<br>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.

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| Gulf Village Renovation and Conversion to PBV through RAD<br>Start date of activity:2028<br>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)<br>(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.

| Emerson Gardens Renovation and Conversion to PBV through RAD<br>Start date of activity:2025<br>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 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.

| The Renaissance Family<br>Renovation and Conversion to PBV through RAD<br>Start date of activity:2026<br>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.

| Renaissance Townhomes<br>Renovation and Conversion to PBV through RAD<br>Start date of activity:2027<br>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.

| Downtown Renaissance<br>Renovation and Conversion to PBV through RAD<br>Start date of activity:2028<br>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.

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

MHA currently administers 76 PBV units across two developments.
MHA is expanding its PBV portfolio with the addition of 209 units across three developments. This will bring MHA's total projected PBV commitment to 285 units, which represents approximately 6% of MHA's total authorized voucher portfolio. This remains well within the statutory 20% program cap.
The project basing of these vouchers contributes to the overall expansion of affordable housing in the Mobile market and the de-concentration of poverty as most developments are located in areas of low poverty or areas of revitalization where significant public and private funding is being invested to improve the economic demographics of the community. Properties are generally located in the following zip codes: 36695, 36618, 36605 and 36541.

As previously reported in prior Annual Plan updates, additional PBV units were selected via a competitive Request for Proposal (RFP) process, in compliance with 24 CFR 983.51 and MHA's Administrative Plan.

MHA supports affordable housing through its use of Project Based Vouchers (PBV) at select developments throughout Mobile City and County (MHA's jurisdiction). The following developments are active PBV properties and/or proposed to receive Project Based Vouchers:

Cottage Hill Place
7600 Cottage Hill Road
Mobile, AL 36695
45 Units

Downtown Renaissance
350 Bloodgood Street
Mobile, AL 36603
31 Units

Live Oak Trace Apartments
6275 Overlook Road
Mobile, AL 36618
14 Units
Senior Property

Maryvale Place Apartments
1901 Hurtel Street
Mobile, AL 36605
95 Units

Creel Road Apartments (Proposed)
12544 Creel Road
Grand Bay, AL 36541
100 Units

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## *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") FY2026 - FY2030 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. I: **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.
- MHA has also enhanced the appearance of its communities via exterior painting and power washing.
- Continued required 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 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.

### B.5 Most Recent Fiscal Year Audit

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

## 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.

## 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.**

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**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.

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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.

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 TTP[53]

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 TPP, 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.

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- 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.

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 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

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

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.

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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.

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.

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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.

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.

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**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

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.