

MOBILE HOUSING BOARD
Revisions to the
2016-2020 5 Year and 2020 Annual Plan
Attachment Section Narratives for
Public Review and Comment



Mobile Housing Board
Revisions to the 2016-2020 Five Year Plan
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Section A. PHA Information

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

Section B. 5-Year Plan

B.1 Mission

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

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

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

Mobile Housing Board ("MHB") FY2016 - FY2020 5-Year Plan and FY2020 Annual Plan highlights MHB'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. MHB 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 MHB will maintain emphases 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, MHB looks to "change the face of affordable housing, one family at a time!"

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MHB's Five-Year Goals.

MHB Strategic Goal No. 1: Design, enhance and implement community revitalization and redevelopment initiatives and strategies in collaboration with key strategic partners, and create quality affordable housing within vibrant communities for families.

- MHB continues to maintain high occupancy levels at Renaissance Gardens, The Renaissance, Downtown Renaissance, Orange Grove Homes, and Emerson Gardens. MHB also began revitalization at Gulf Village Homes and Oaklawn Homes by increasing unit turns and leasing activities which has resulted in increased occupancy at both sites, with an overall end goal of 100% occupancy.

MHB Strategic Goal No. 2: Enhance the attractiveness and marketability of the housing stock and neighborhoods in order to attract and retain working families.

- MHB 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.
- Implemented required housekeeping inspections/unit visits via collaboration between property management and resident services to determine the condition of each occupied unit, to counsel, and encourage residents.

MHB'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.

- MHB 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.
- **MHB** has continued the ongoing upgrade and enhancement of its electronic and computer hardware. Yardi online application module went live June 2019. The Payscan module went live September 2019.

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- Continued to make supportive services available for elderly and disabled families through various community partnerships.
- Completed another success Summer Work Experience Training Program (Sweet-P Program) for 35 high school and college age youth.

MHB Strategic Goal No. 4: Improve the public and community image of MHB by updating and executing a comprehensive Public Relations and Marketing Strategy.

- MHB will continue its active participation in the City of Mobile's and various neighborhood planning sessions and other initiatives designed to discuss and promote redevelopment and affordable housing in and around the City of Mobile.
- MHB 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.

B.3 Progress Report (included in B.2)

See previous section B.2 includes progress report.

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B.4 Violence Against Women Act (VAWA Goals)

From the MHB ACOP, Section 16-VII.C

MHB Policy

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

- A notice of occupancy rights under VAWA to public housing program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)
 - A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)
 - A copy of MHB's emergency transfer plan (Exhibit 16-3)
 - A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)
 - The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800- 787-3224 (TTY) (included in Exhibit 16-1)
 - Contact information for local victim advocacy groups or service providers
-
- The VAWA information provided to applicants and participants will consist of the notices in Exhibit 16-1 and 16-2.
 - MHB will provide all applicants with information about VAWA at the time they request an application for housing assistance. MHB will also include such information in all notices of denial of assistance (see section 3-III.F).
 - MHB will provide all tenants with information about VAWA at the time of admission (see section 8-I.B) and at annual reexamination. MHB will also include such information in all lease termination notices (see section 13-IV.D).

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

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B.5 Significant Amendment or Modification

The Mobile Housing Board's ("MHB") is amending our definition of, "significant/substantial Amendment", and/or, "substantial deviation/modification", as set forth below.

MHB's criteria for defining and / or determining a significant amendment is one that meets the following criteria:

1. An amendment that fundamentally changes MHB's mission as stated in the plan.
 2. Reduces housing offered by MHB in any one program, or collectively by more than 15% that is not part of an approved demolition or disposition application; or
 3. A planned action, or policy change, not as the result of a disaster response or government directive, that is estimated to reduce or MHB's budget by more than 25%; or
 4. A program policy change that programmatically increases total tenant payment for more than 10% of the participants; or
 5. A modification to admissions policies, waiting list preferences, participant selection, denial or termination of assistance, that is not mandated by HUD, or already alluded to in the Five-Year or Annual Plan, ACOP.
- Changes adopted or implemented to reflect changes in Federal or HUD regulatory requirements or if such changes are adopted in response to a significant reduction in funding shall not require a new plan or public review and comment period.

Other than for a "significant/substantial amendment" or a "substantial deviation/modification," as defined above, MHB may make changes to its Five-Year Plan or Annual Plan strategies, goals, and objectives without the necessity of re-submitting a revised plan, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board or resident consultation.

B.6 Resident Advisory Board (RAB) Comments

Will be included once the revision has completed the public review and comment period.

B.7 Certification by State or Local Officials

Current certification is included in Section B.7 of the 2020 Annual Plan as a part of this document.

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Revisions to the 2020 Annual Plan

2020 HUD-50075 Revised Annual Plan Response Narratives

Section A. MHB Information

Background:

The MHB originally submitted the 2020 Annual Plan on October 19, 2019, and the Five-Year Plan for 2016 – 2020 in 2015. Following MHB discussion with HUD, both parties agreed that submission could be revised and improved, as new management did not have adequate time to include full information on MHB’s plans for the coming five-year period. It was determined that both the 2020 Five-Year Plan, and the 2020 Annual Plan, could be resubmitted to allow proper notice to the community and HUD of all MHB’s improvements, demolition, and strategic initiatives.

Section B. Annual Plan Elements

B.1 Revision of PHA Plan Elements

(a) See Template

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

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

MHB’s statement of housing need is an excerpt from the City of Mobile’s Consolidated Plan for 2018-2023, pages 40 – 42, which is quoted below:

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Per guidance from HUD, the disproportionate housing need assessment was included in the City's Assessment of Fair Housing (completed in August 2017) and does not need to be included in the Consolidated Plan.

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0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,135	1,380	1,745
White	1,905	415	555
Black / African American	5,835	895	1,100
Asian	90	0	50
American Indian, Alaska Native	20	0	10
Pacific Islander	4	0	0
Hispanic	155	44	14

Table 14 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,250	2,285	0
White	2,450	875	0
Black / African American	4,505	1,405	0
Asian	130	0	0
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	100	4	0

Table 15 - Disproportionally Greater Need 30 - 50% AMI

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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,965	4,290	0
White	2,485	1,955	0
Black / African American	4,040	2,180	0
Asian	110	25	0
American Indian, Alaska Native	40	10	0
Pacific Islander	0	0	0
Hispanic	245	70	0

Table 16 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2340	4615	0
White	1020	1955	0
Black / African American	1270	2380	0
Asian	0	115	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	35	125	0

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Table 17 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2009-2013 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%.

NA-35 Public Housing – 91.205(b) Introduction (Pages 48-49 of the Consolidated Plan)

The Mobile Housing Board (MHB), the housing authority for the City of Mobile, serves 3,636 residents in 1,806 public housing units and 3,989 households through the Housing Choice Voucher program. The majority (96%) of residents residing in public housing and vouchers are Black/African American. As noted in the Assessment of Fair Housing, the majority of public housing units in Mobile are located in predominately Black neighborhoods that are within R/ECAPs in eastern Mobile. The percentage of Housing Choice Vouchers within a Census tract is correlated to the demographics of the tract. The Census tracts with the highest percentage of voucher units tend to be located along the outskirts of the city and in predominately Black Census tracts. The average annual income of residents served by the MHB is \$11,435 for public housing and \$12,322 for Housing Choice Vouchers. Both figures are near the FY 2017 extremely low-income limit of \$12,060 established by HUD for Mobile County.

Totals in Use

	Public Housing	Vouchers					
		Total	Project Based	Tenant Based	Special Purpose Voucher		
					Veterans Affairs Supportive Housing	Family Unification	Disabled
# of units / vouchers in use	2,161	3,396	0	3,322	20	14	23

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Table 23 - Public Housing by Program Type *includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents	Program Type					
	Public Housing	Vouchers				
		Total	Project Based	Tenant Based	Special Purpose Voucher Veterans Affairs Supportive Housing	Family Unification
Average Annual Income	9,125	9,553	0	9517	6790	9080
Average length of stay	8	5	0	5	0	8
Average Household size	2	2	0	2	1	4
# Homeless at admission	0	174	0	170	2	1
# of Elderly Program Participants (>62)	697	247	0	244	0	0
# of Disabled Families	311	694	0	658	8	4
# of Families requesting accessibility features	2,161	3,396	0	3322	20	14
# of HIV/AIDS program participants						
# of DV victims	0	0	0	0	0	0
0						

2. Strategy for Addressing Housing Need.

As a part of the Annual Plan resubmission, MHB can now say it is truly working much better with the City of Mobile and collaborating towards a unified strategy for addressing the Housing Needs. MHB’s Housing Needs are identical to the needs and demographics throughout the MSA. At this time of resubmission, the Mobile Housing Board strategy for addressing the needs is to:

- Implement landlord outreach initiatives to increase more available units for HCV participants;
- Streamlining the application process to allow applicants to apply online for all rental assistance programs;
- Award make ready contracts to vendors to increase occupancy from the waiting list and decrease the wait time to house families off the public housing waiting list.

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In addition, MHB plans to assist in the long-term viability of the affordable housing through:

- The Low-Income Housing Tax Credit program ("LITHC") administered by the Alabama Housing Finance Agency ("AHFA"),
- Section 18 Demolition/Disposition and/or Mandatory Conversion protocols under HUD rules,
- One of the affordable populations on which MHB will focus includes single heads of households (many with children), the elderly, and persons with disabilities.

Service Provider Partnerships/Key Programs. MHB has entered into a Memorandum of Understanding with the City of Mobile to offer a greater array of services to families and their development needs through a grant to train interested families in the field of Certified Nursing.

MHB will work with the City to develop a long-term strategy for redevelopment and maintenance of public housing sites. The City of Mobile plans to assist with the demolition of the Josephine Allen development. Moreover, MHB will continue participation of the Veterans Affairs Supportive Housing (VASH) Program to assist homeless Veterans. MHB's HUD-VASH is a partnership between MHB and the local Veterans Administration Office. The program provides Housing Choice Voucher ("HCV") rental assistance for homeless veterans, with case management and clinical services provided by the Veterans Administration ("VA") service centers.

MHB Affirmatively Further Fair Housing Efforts

MHB certifies we are affirmatively furthering fair housing as part of the activities described in the 2020 Annual Plan by:

1. Examining our programs, proposed programs, and opportunities for clients;
2. Identifying any impediments to fair housing choice within our programs;
3. Taking action to address identified impediments in a reasonable fashion in view of the resources available; We are operating hastily under a current VCA with HUD.
4. MHB is working with local jurisdictions to implement the City of Mobile's initiatives to affirmatively further fair housing when our involvement is helpful.
5. We maintain records reflecting these analyses and actions.

For Example:

MHB has an intergovernmental agreement with the City of Mobile. MHB is part of a community partnership, which works with the City of Mobile advocacy organizations affirmatively to further fair housing by providing training and guidance within the locality. Information is disseminated city wide utilizing local newspapers and the MHB website,

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www.mobilehousing.org To support the City's commitment to non discrimination and equal opportunity in housing, MHB makes special efforts to assure that housing programs assisted with federal or local funds are made widely known throughout the community.

Economic and Self-Sufficiency Programs

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

Economic and Life-style Independence Services and Programs				
Program Name and Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/ other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or Section 8 participants or both)
S-8 FSS	125	Random; applicant recruitment	Business and Community Services Group	HCV (i.e., S-8)
PHFSS	77	Random; applicant recruitment	Business and Community Services Group	Affordable Housing
SWEET-P	2019 : 35	Random	Business and Community Services Group	Both
Employment and Job-training Preparation	2019 : 500	Specific Criteria	Business and Community Services Group	Both
Health Wellness Initiative	350	Specific Criteria for residents at four (4) elderly sites	Business and Community Services Group	Affordable Housing

Family Self Sufficiency ("FSS") Participation Programs

Program	Required Number of Participants (start of FY2019 Estimate)	Actual Number of Participants(As of: 09/30/2019)
Affordable Housing	85	85
Section 8	125	125

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

MHB'S Statement of Anticipated Financial Resources Anticipated Financial Resources (estimated as of: 9/25/2019).

MHB's statement of estimated or anticipated financial resources, by general categories, as referenced in Section 6.2 of this FY2020 Annual Plan is set forth below:

<u>Sources</u>	<u>Planned\$</u>	<u>Planned Uses</u>
1. Federal Grants (FY2020 grants)		
a. Public Housing Operating Fund	\$7,200,000	LIPH
b. Public Housing Capital Fund	\$6,400,000	LIPH
c. Annual Contributions for Section 8 Tenant-Based Assistance & PBV	\$31,500,000	Rental Assistance
d. ROSS Grant	\$209,720	Resident Services
 <u>Other Federal Grants</u>		
a. DV Mainstream	608,000	Rental Assistance
 <u>Sources</u>		
2. Prior Year Federal Grants (un-obligated funds only)		
a. CFP \$6,500,000		Affordable Housing
b. ROSS \$191,282		Supportive Services
3. Public Housing Dwelling Rental Income		
a. Dwelling Rent 2020	\$4,100,000	LIPH
a. Other Income		
a. Miscellaneous Receipts	300,000	LIPH, HCV & COCC
a. Non-Federal Sources		
<i>N/A</i>		
Total Resources	\$57,009,002	

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B.1b (3) Operations and Management - ACOP and HCV Admin Plan Changes

MHB has made updates and revisions to the ACOP and HCV Administrative Plan to incorporate changes in HUD policy, regulations, and MHB operational changes since 2019's revision.

Electronic copies that are now, "Point-And-Click" enabled are being submitted with this revision.

B.1b (4) Change to the Definition of Significant Amendment or Modification

The Mobile Housing Board's ("MHB") is amending our definition of, "significant/substantial Amendment", and/or, "substantial deviation/modification", as set forth below.

MHB's criteria for defining and / or determining a significant amendment is one that meets the following criteria:

1. An amendment that fundamentally changes MHB's mission as stated in the plan.
 2. Reduces housing offered by MHB in any one program, or collectively by more than 15% that is not part of an approved demolition or disposition application; or
 3. A planned action, or policy change, not as the result of a disaster response or government directive, that is estimated to reduce or MHB's budget by more than 25%; or
 4. A program policy change that programmatically increases total tenant payment for more than 10% of the participants; or
 5. A modification to admissions policies, waiting list preferences, participant selection, denial or termination of assistance, that is not mandated by HUD, or already alluded to in the Five-Year or Annual Plan, ACOP.
- Changes adopted or implemented to reflect changes in Federal or HUD regulatory requirements or if such changes are adopted in response to a significant reduction in funding shall not require a new plan or public review and comment period.

Other than for a "significant/substantial amendment" or a "substantial deviation/modification," as defined above, MHB may make changes to its Five-Year Plan or Annual Plan strategies, goals, and objectives without the necessity of re-submitting a revised plan, conducting a public hearing, or otherwise engaging in Five-Year Plan Resident Advisory Board or resident consultation.

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<p>Certifications of Compliance with PHA Plans and Related Regulations <i>(Standard, Troubled, HCV-Only, and High Performer PHAs)</i></p>	<p style="text-align: right;">U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 02/29/2016</p>
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PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and Annual PHA Plan for the PHA fiscal year beginning 2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

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12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Mobile Housing Board
PHA Name

AL002
PHA Number/HA Code

Revised Annual PHA Plan for Fiscal Year 2020

5-Year PHA Plan for Fiscal Years 2016 - 2020

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

The MHB has entered into a VCA with HUD. Also, as a resubmitted plan, certain elements, including but not limited to the RAB, VCA elements, and factors beyond which cannot be changed retroactively, were discussed with HUD and the Plan resubmitted with a continued plan of action for compliance in succeeding years, and in plans for 2020 and beyond. This document is being submitted to achieve compliance with an understanding of the exceptions.

Name of Authorized Official	Title
Michael Pierce	Executive Director
Signature Will be signed upon completion of the public review period	Date of Resubmission Will be dated upon re-submission

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

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

MHB Policy

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

Step 2. The MHB 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 MHB has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

MHB Policy

The Mobile Housing Board 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 MHB 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 MHB 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 MHB must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

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Depending on local circumstances MHB'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 MHB in consultation with the residents and the community through the annual plan process to be responsive to local needs and MHB strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under MHB's deconcentration policy. MHB must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under MHB'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, MHB will be considered to be in compliance with the deconcentration requirement and no further action is required.

MHB Policy

For developments outside the EIR MHB 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 MHB 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 MHB will take actions to insure 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.

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- 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 MHB will take the following actions:

1. At the beginning of each MHB fiscal year, the MHB 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 MHB fiscal year.
2. To accomplish the goals of deconcentration:
 - a. Not less than 40% of the MHB 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 MHB shall determine the average income of all families residing in all the MHB's covered developments. The MHB shall determine the average income of all families residing in each covered development. In determining average income for each development, the MHB has adjusted its income analysis for unit size in accordance with procedures prescribed by HUD. The MHB 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.

B.2 New Activities

- (a) See Template checkboxes

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B.2.(b) Demolition and / or Disposition Applications

In the second quarter of 2020, approximately in May 2020, MHB intends to apply for Section 18 of the 1937 Act for either the demolition of all, or significant portions of the following developments:

Demolition of Josephine Allen Homes.

la. Development name: Josephine Allen Homes

lb. Development (project) number: AL002000008

lc. Description of development:

This rental housing development has 55 two-story buildings, and 1 non-dwelling building. Residents, including families, singles and seniors, occupy the units. The complex consists of 292 units with the following breakdown: 60 one-bedroom, 72 two-bedroom, 111 three-bedrooms, 36 four-bedroom units, 12 five-bedroom units, and 1 six-bedroom unit. 7 approved non-dwelling units are included in this unit count. Josephine Allen Homes is located at 650 N. Dr. Thomas Avenue, Mobile, AL 36610.

2. Activity Type: Public Housing

3. Number of units affected: 292

Coverage of action: Total development

4. Alternative Funding:

The City of Mobile has deemed Josephine Allen a public nuisance and will demolish the site by December 2018.

5. Timeline for activity:

a. Projected start date of activity: 2019

b. Projected end date of activity: 2019

c. Future development uses of the sites are not known at this time.

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Demolition of Thomas James Place

Demolition and/or Disposition.

Section 18 Demolition and Disposition of the following Public Housing Units. 1) A description of any housing (including project number (if known) and unit count) for which the MHB will apply Section 18 Demolition and Disposition; and 2) A timetable for the submission of applications.

la. Development name: Thomas James Place

lb. Development (project) number: AL002000005

lc. Description of development:

This rental housing development has 508 single-story buildings, 11 two-story buildings, and 7 non-residential buildings. Residents, including families, singles and seniors, occupy the units. The complex consists of 796 units with the following breakdown: 132 one-bedroom units, 463 two bedroom units, 197 three-bedroom units, 0 four-bedroom units, and 4 five-bedroom units. 1 approved non-dwelling unit is included in this unit count. The non-dwelling buildings include management offices, warehouses/storage buildings, office buildings and an Economic Development Center. Tenants in these buildings include MHB/affiliate professionals, commercial and other tenants. Thomas James Place is located at 1555-A Eagle Drive, Mobile, AL 36605.

2. Activity Type: Public Housing

3. Application Status: Planned for Application May 2020

4. Number of units affected: 796

5. Coverage of action: Total development

6. Timeline for activity:

a. Projected start date of activity: 2020

b. Projected end date of activity: 2024

c. Future development uses of the sites are not known at this time.

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Demolition of RV. Taylor Plaza

la. Development name: RV. Taylor Plaza

lb. Development (project) number: AL002000010

lc. Description of development:

This rental housing development has 450 dwelling unit buildings, and 4 non-dwelling buildings. Residents, including families, singles and seniors, occupy the units. The complex consists of 450 units with the following breakdown: 144 one-bedroom, 68 two-bedroom, 198 three-bedroom, 28 four-bedroom, 12 five-bedroom. 6 approved non-dwelling units are included in this unit count.

R.V. Taylor Plaza is located at 1509 Plaza Drive, Mobile, AL 36605.

2. Activity Type: Public Housing

3. Application Status: Planned for Application May 2020

4. Number of units affected: 450

5. Coverage of action: Total development

6. Timeline for activity:

a. Projected start date of activity: 2020

b. Projected end date of activity: 2024

c. Future development uses of the sites are not known at this time.

Demolition of W. Boykin Tower

la. Development name: W. Boykin Tower

lb. Development (project) number: AL002000016

lc. Description of development:

This rental housing development is an eight-story building. Senior residents occupy the units. The building consists of 122 units with the following breakdown: 98 one-bedrooms, 12 one-bedroom handicapped units, and 13 two-bedrooms. Frank W. Boykin Tower is located at 1600 Michigan Avenue, Mobile, AL 36605.

2. Activity Type: Public Housing

3. Application Status: Planned for Application May 2020

4. Number of units affected: 122

5. Coverage of action: Total development

6. Timeline for activity:

a. Projected start date of activity: 2020

b. Projected end date of activity: 2024

c. Future development uses of the sites are not known at this time.

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B.3 Civil Rights Certification.

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, is submitted by the MHB as an electronic attachment to this PHA Plan.

B.4 Most Recent Fiscal Year Audit

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

1. Housing Choice Voucher Tenant Files, Eligibility, Rent Calculations, Noncompliance & Significant Deficiency.
2. Public Housing Eligibility, Tenant Account Receivables and Rent Collection CFDA- 14.850, Noncompliance & Significant Deficiency.
3. Public Housing Capital Fund Program Allowability of Costs - Ineligible wire transfer resulting from loss of funds CFDA- 14.872, Noncompliance & Significant Deficiency.
4. Housing Choice Voucher Program Allowability of Costs - Overpayments to housing owners - Noncompliance & Significant Deficiency.
5. Public Housing Capital Fund Program Procurement - Failure to monitor renovations contracts CFDA- 14.872, Noncompliance & Significant Deficiency.

Finance staff are making progress in mitigating all findings.

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B.5 Progress Report & 5 Year Goals

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

Mobile Housing Board ("MHB") FY2016 - FY2020 5-Year Plan and FY2020 Annual Plan highlights MHB'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. MHB 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 MHB will maintain emphases 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, MHB looks to "change the face of affordable housing, one family at a time!"

MHB's Five-Year Goals.

MHB Strategic Goal No. 1: Design, enhance and implement community revitalization and redevelopment initiatives and strategies in collaboration with key strategic partners, and create quality affordable housing within vibrant communities for families.

- MHB continues to maintain high occupancy levels at Renaissance Gardens, The Renaissance, Downtown Renaissance, Orange Grove Homes, and Emerson Gardens. MHB also began revitalization at Gulf Village Homes and Oaklawn Homes by increasing unit turns and leasing activities which has resulted in increased occupancy at both sites, with an overall end goal of 100% occupancy.

MHB Strategic Goal No. 2: Enhance the attractiveness and marketability of the housing stock and neighborhoods in order to attract and retain working families.

- MHB 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.

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- Implemented required housekeeping inspections/unit visits via collaboration between property management and resident services to determine the condition of each occupied unit, to counsel, and encourage residents.

MHB'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.

- MHB 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.
- **MHB** has continued the ongoing upgrade and enhancement of its electronic and computer hardware. Yardi online application module went live June 2019. The Payscan module went live September 2019.
- Continued to make supportive services available for elderly and disabled families through various community partnerships.
- Completed another success Summer Work Experience Training Program (Sweet-P Program) for 35 high school and college age youth.

MHB Strategic Goal No. 4: Improve the public and community image of MHB by updating and executing a comprehensive Public Relations and Marketing Strategy.

- MHB will continue its active participation in the City of Mobile's and various neighborhood planning sessions and other initiatives designed to discuss and promote redevelopment and affordable housing in and around the City of Mobile.
- MHB 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.

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B.6 Resident Advisory Board (RAB) Comments (included after comment period)

RAB Comments will be obtained from the Public Review and Comment period and included upon submission of the revised Plan to HUD.

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B.7 Certification by State or Local Officials

Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, is submitted by the MHB as an electronic attachment to this PHA Plan.

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan (All PHAs)	U. S Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 2/29/2016
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Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, William S. Stimpson, the Mayor
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the
Mobile Housing Board
PHA Name


is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
 Impediments (AI) to Fair Housing Choice of the
City of Mobile
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

This FY2020 update is a continuation of the FY2016 Five-Year plan and reflects a significant amendment for New Activities. The new activities reflect the upcoming Section 18 and/or Mandatory Conversion applications for Thomas James, RV Taylor, and Boykin Tower.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official William S. Stimpson	Title Mayor
Signature 	Date 10/23/19

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B.8 Troubled PHA - Voluntary Compliance Agreement (VCA) Executed

(a) Yes, MHB has a current MOA and VCA with HUD in place.

(b) If Yes, please describe.

(I) MHB is no longer classified as a Troubled PHA. However, due to the extent of its deficiencies the agency entered into a Recovery Agreement with HUD on May 10, 2018. The Board of Commissioners (Board) fully performs its duty of overseeing the operations of MHB. At its regularly scheduled meeting on July 9th, the Board appointed Michael E. Pierce as MHB's Executive Director. Mr. Pierce provides day to day management of MHB and provides the necessary guidance and leadership to staff. The goal of the Recovery Plan is to transition MHB from Troubled to Standard Performance designation. MHB has moved from the troubled designation to the substandard designation. MHB has fully implemented Asset Management as required by HUD. MHB has reasonable and logical cost allocation principles. MHB has a fully updated Internal Control Policy that covers conflict of interest, appropriate solicitation, selection, and awarding of contracts. The Housing Managers and Director of Maintenance provide oversight and leadership to the Maintenance Department. MHB has implemented several initiatives that have resulted in improved physical condition and providing residents with decent, safe, and sanitary housing which includes completion for all Energy Audits and Physical Needs Assessments. MHB provides the Field Office with a 5-year Capital Fund plan (as required) and prioritizes work in the plan to address the modernization needs of MHB to maximize the PASS score and living needs of residents. MHB has increased HUD PIC Reporting to the 95-98% level. MHB updates/purges waiting list to select tenants for the programs according to HUD Guidelines. OIG Audit Findings closed timely.

(II) In addition, MHB has executed a Voluntary Compliance Agreement as described below:

Voluntary Compliance Agreement. Mobile Housing Board is currently under a Voluntary Compliance Agreement. Mobile Housing Board has made three submissions to become compliant under the VCA. Below you will find each submission date and the corresponding activities that were performed.

1. Submission 1: April 26th, 2019
 - o Voluntary Compliance Appointments
 - o Reasonable Accommodation Log
 - o Resident Transfer Log
 - o Reasonable Accommodation Policy
 - o Mobile Housing Board Employee VCA Acknowledgement
- o Submission 2: May 17, 2019
 - o Title VI Coordinator Appointment

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- o 504 Design Consultant Appointment
- o Fair Housing Training Instructor, Agenda, and Training Log
- o Section 3 policy
- o Submission 3: June 28, 2019
 - o VCA notification to MHB Resident Advisory Board
 - o Draft reasonable accommodation letter for residents
 - o Guidance for property managers to distribute revised policies to applicants and residents.
 - o Resume for 504/ADA Coordinator
 - o Section 504/ADA independent vendor name, qualifications, and experience
 - o Section 3 Coordinator
- o Submission 4: September 17, 2019
 - o Changed the 504 Design Consultant, Creative Housing Solutions (CHS).
 - Met with CHS on 9/30/19 to discuss VCA and Accessibility Plan.
 - CHS began inspections of MHB ADA units 9/30/19. o
 - Named Allred Architectural Group as the 504 Design Certifier.
- o Confirmation: November 12, 2019
 - Received Letter from HUD Subject: Compliance with FHEO Compliance Agreement.
 - MHB Continues to work to mitigate and resolve all issues.

C.1 Capital Improvements

MHB hereby references the most recent HUD-approved 5 -Year Action Plan (HUD 50075.2) dated and approved by HUD.