

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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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, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Greater Gadsden Housing Authority</u> PHA Code: <u>AL049</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer Score of 91 for PHAS & Score of 104 for SEMAP, which are both High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/01/2021</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>974</u> Number of Housing Choice Vouchers (HCVs) <u>112</u> Total Combined <u>1086</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) Not Applicable </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification (New definition in this Five-Year Plan)</p> <p>Note: While none of these elements were specifically changed, GGHA did adopt some waivers and establish some alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher Program pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136). A copy of the adopted waivers and alternative requirements is included under section c below:</p> <p>(b) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>The following is the Deconcentration Policy for Public Housing and Section 8 and it is being submitted for review: The Deconcentration Policy for Public Housing is contained in the Admissions and Continue Occupancy Policy (ACOP) in SECTION XIX as follows: SECTION XIX: Deconcentration Rule:</p> <p>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 HA 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 HA will take actions to ensure that no individual development has a concentration of higher income families in one or more of the developments. The HA will track the status of family income, by development, on a monthly basis by utilizing income reports generated by the HA's computer system.</p> <p>B. Exemptions: The following are exempt from this rule.</p> <ul style="list-style-type: none"> • 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. <p>C. Actions: To accomplish the deconcentration goals, the HA will take the following actions:</p> <ol style="list-style-type: none"> 1. At the beginning of each HA fiscal year, the HA 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 HA fiscal year. 2. To accomplish the goals of deconcentration: <ol style="list-style-type: none"> a. Not less than 40% of the HA admissions on an annual basis shall be to families that have incomes at or below the extremely low-income; and, b. The HA shall determine the average income of all families residing in all the HA's covered developments. The HA shall determine the average income of all families residing in each covered development. In determining average income for each development, this HA has adjusted its income analysis for unit size in accordance with procedures prescribed by HUD. The HA 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, except that the upper limit (115 percent) shall never be less than the income at which a family would be defined an extremely low-income family. <p>NOTE: To calculate the extremely low-income figure: Find the average family size (HA wide) of the covered developments and extrapolate the amount from the HUD published extremely low-income limits. For example, if the average family size is 2.6, the two person limit may be \$12,400 and the three person limit may be \$13,950. Therefore, the figure will be \$12,400 plus 60% of the difference between the two figures, which is \$13,330. This figure will be recalculated upon receipt of new HUD determined income limits.</p> <p>NOTE: Fair housing requirements. All admission and occupancy policies for public housing programs must comply with Fair Housing Act requirements and with regulations to affirmatively, further fair housing. The HA may not impose any specific income or racial quotas for any development or developments.</p> <p>The Deconcentration Policy for Section 8 Housing Choice Voucher Program is contained in the Section 8 Administrative Plan in SECTION XXXVIII as follows:</p> <p>XXXVIII - DECONCENTRATION RULE</p> <p>The objective of the deconcentration rule for HCV tenant-based assistance is to admit no less than 75% of its new admissions to the program to families that have income at or below the extremely low-income limit. The HA will track the status of all new admissions monthly by utilizing income reports generated by the HA's computer system. The goal will be tracked monthly and if the HA is not reaching its goal, families will</p>

be skipped on the waiting list to admit a family that has income that is at or below 30% of area median income. The practice will continue until the HA achieves its goal. The HA's HCV applicant selection process, which is contained in the HCV Administrative Plan provides for the skipping of families on the waiting list to accomplish this goal. The HA may also accomplish this goal by only opening the waiting list to families who fall at or below the very-low income limits.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

Admissions and Continued Occupancy Policy Addendum
Greater Gadsden Housing Authority (GGHA)
This Addendum is being Executed in Accordance Notice PIH 2020-05
Effective April 10, 2020

Pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD waived and established alternative requirements for numerous statutory and regulatory requirements for the Public Housing Program. The GGHA determined which waivers would be of most beneficial to continue operations during the COVID-19 Pandemic and implement the waivers listed below:

1. Family Income and Composition: Annual/Interim Examination - Income Verification Requirements (PH and HCV-3 & PH and HCV-4)

The GGHA is temporarily suspending the mandatory use of income hierarchy described by PIH Notice 2018-18 and will forgo third-party income verification requirements for reexaminations, including the use of EIV when determined necessary to complete annual/interim reexaminations in a timely manner. Self-certification will be considered the highest form of income verification to process reexaminations when EIV or other third-party verification is not readily available (delayed). This may occur over the telephone (but must be documented by PHA staff with a contemporaneous written record), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications.

Families will be reminded of their obligation to provide true and complete information when contacted using these flexibilities. If material differences arise later between resident certified income/deductions and EIV or other verifiable sources, residents will be charged retroactive rent and required to repay any amount due or risk lease termination.

The GGHA is further suspending the requirement for in-person interviews and delaying the signing of replacement pages of the lease. Rent changes will be made by a Notice of Rent Change and shall be made a part of the lease until conditions allow for in-person interviews.

These modified verification requirements shall end on July 31, 2020, unless extended by HUD. Extended until June 30, 2021

2. Community Service and Self-Sufficiency Requirement (CSSR) (PH-5)

GGHA is adopting the waiver to suspend the community service and self-sufficiency requirements for each adult resident of public housing, except for any family member that is exempt, contribute 8 hours per month of community service or participate in an economic self-sufficiency program or a combination of both. Residents will not be subject to this requirement until the family's next annual reexamination.

Upon the family's next annual reexamination, GGHA should report on Form HUD-50058 each individual's CSSR status as either exempt for those that are exempt or pending for those that are otherwise eligible but for which the suspension prevents a housing authority from determining compliance.

This waiver ends on March 31, 2021, unless extended by HUD. Extended until June 30, 2021.

Housing Choice Voucher (Section 8) Administrative Plan
Greater Gadsden Housing Authority (GGHA)
This Addendum is being Executed in Accordance Notice PIH 2020-05
Effective April 10, 2020

Pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act (Public Law 116-136), HUD waived and established alternative requirements for numerous statutory and regulatory requirements for the Housing Choice Voucher (Section 8) Program. The GGHA determined which waivers would be of most beneficial to continue operations during the COVID-19 Pandemic and implement the waivers listed below:

1. Family Income and Composition: Annual/Interim Examination - Income Verification Requirements (PH and HCV-3 and 4)

The GGHA is temporarily suspending the mandatory use of income hierarchy described by PIH Notice 2018-18 and will forgo third-party income verification requirements for reexaminations, including the use of EIV when determined necessary to complete annual/interim reexaminations in a timely manner. Self-certification will be considered the highest form of income verification to process reexaminations when EIV or other third-party verification is not readily available (delayed). This may occur over the telephone (but must be documented by PHA staff with a contemporaneous written record), through an email or postal mail with a self-certification form by the tenant, or through other electronic communications.

Families will be reminded of their obligation to provide true and complete information when contacted using these flexibilities. If material differences arise later between resident certified income/deductions and EIV or other verifiable sources, residents will be charged retroactive rent and required to repay any amount due or risk termination from the program.

B.2

The GGHA is further suspending the requirement for in-person interviews.

These modified verification requirements shall end on July 31, 2020, unless extended by HUD. Extended until June 30, 2021

2. Housing Quality Standards (HQS) Inspections

a. Initial Inspection Requirements (HQS-1)

GGHA is suspending the requirement to inspect units before any assistance payment is made to determine whether the unit meets HQS and as an alternative, GGHA will rely on the owner's certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question instead of conducting an initial inspection. GGHA will conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

This alternative to allow owner certification will end on July 31, 2020, unless extended by HUD. Extended until June 30, 2021

b. Biennial Inspections (HQS-5)

GGHA is implementing the waiver to delay biennially inspections until reasonably safe to perform inspections under COVID-19 protocols. All delayed inspection must be completed by October 31, 2020 unless extended by HUD. Extended until June 30, 2021

c. Interim Inspections (HQS-6)

GGHA is implementing the waiver to use alternative means to confirm HQS compliance when notified by a family or government official that the assisted unit does not comply with the HQS.

If the reported deficiency is life-threatening, GGHA will notify the owner of the reported life-threatening deficiency and that the owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation (e.g., text or email a photo to GGHA) that the reported deficiency does not exist. In the case of a reported non-life-threatening deficiency, GGHA will notify the owner of the reported deficiency within 30 days and the owner must either make the repair or document that the deficiency does not exist within 30 days of the PHA notification or any approved GGHA extension.

This alternative means of verification will end on July 31, 2020. Extended until June 30, 2021

d. Quality Control Inspections (HQS-9)

The requirement for the GGHA to conduct supervisory quality control inspections of a sampling of units under contract is waived until October 31, 2020. Extended until June 30, 2021

3. Information When Family is Selected - PHA Oral Briefing (HCV-2)

GGHA will implement the waiver for oral briefings. The GGHA will include everything covered in the required oral briefing in the information packet provided to families selected for the program in addition to providing an abbreviated oral briefing via telephone (or other acceptable means if required as a reasonable accommodation).

This waiver will end on July 31, 2020. Extended until June 30, 2021

4. Term of Voucher – Extensions of Term (HCV-3)

Under HUD's waiver authority the GGHA will be more lenient in granting extensions of the voucher term than normally required under the Administrative Plan.

This waiver will end on July 31, 2020 unless extended by HUD. Extended until June 30, 2021

5. Absence from Unit (HCV-5)

GGHA is implementing the waiver to allow a family to be absent from the unit for a period of more than 180 consecutive calendar days due to extenuating circumstances (e.g., hospitalization, extended stays at nursing homes, caring for family members).

This waiver will expire on December 31, 2020, unless extended by HUD. No payments will be made beyond December 31, 2020, and the HAP contract will terminate on that date if the family is still absent from the unit.

6. Automatic Termination of HAP contract (HCV-6)

GGHA is implementing the waiver to allow a family to remain on the program for more than 180 days when an HCV family's income increases to the extent that the housing assistance payment is reduced to \$0. The GGHA will provide written notice to the owner and family extending the period of time following the last payment to the owner that triggers the automatic termination of the HAP contract. The extension may not extend beyond December 31, 2020.

	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>Project-Based Vouchers – GGHA will be looking for opportunities to use Project-Based Vouchers to increase housing opportunities for voucher holders and to serve specific populations including Veterans and the Homeless. GGHA is scheduled to receive 82 Tenant Protection Vouchers (new Funding) and may consider project basing some or all these vouchers at the current location of the tenants if it will help ensure viability of the development.</p> <p>Other: GGHA may apply for tenant protection vouchers under the foster youth to independence initiative (FYI) if the local DHR Office determines there is a need for such vouchers and requests GGHA seek funding.</p> <p>Vacancies for Modernization – Ongoing modernization of Colley Homes (AL049-1) continues to require units be vacant for the work and as units are completed, other units are placed in Mod status. The number of units fluctuates between 16 and 22.</p> <p>Other Capital Grant Programs GGHA is looking at applying for a Safety and Security grant in 2021 to install security measures at all site offices and Carbon Monoxide detectors in all units with gas.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>To help ensure that the HA meets its mission, ten (10) goals have been established as outlined in Section B.2 of the 5-Year Plan. Goals are established for a 5-year period and monitored each Fiscal Year End. The current cycle for the 5-year period goals ends on June 30, 2024. As of this date, the HA is meeting and/or exceeding all 10 goals outlined in the Five-year plan except for Goal V-c. Goal V-c requires that at least 75 percent of new admissions are at or below the extremely low-income limit. Only 72 percent (18 of 25) of admissions met this goal for 2020. The COVID-19 virus was the major factor in missing this goal as expected turnover did not occur the last few months of the fiscal year that would have allowed us to meet this goal. We are working to ensure this does not happen in the future.</p>
<p>B.4.</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. Ref: Attachment al049a01</p>
<p>C.2</p>	<p>Civil Rights Certification.</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. Ref: Attachment al049a01</p>

<p>C.3</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>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. Ref: Attachment a1049b01</p>
<p>C.4</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. Ref: Attachment a1049c01</p>
<p>D Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
<p>D.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>HUD approved the GGHA’s revised 5-Year Action Plan (HUD-50075.2) for years 2020 thru 2024 in EPIC on 5/19/2020 and the 2020 Annual Statement was submitted in the EPIC system. The GGHA anticipates submitting a new 5-Year Action Plan (HUD-50075.2 for years 2022 thru 2025 and a 2021 Annual Statement via EPIC to HUD for approval in Summer of 2021 (awaiting instructions from HUD). The draft of these documents was included in the resident meetings and public hearing for this annual plan.</p>

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section.

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

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

B. Annual Plan.

B.1 Revision of 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.”

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. 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 and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list 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. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(1\)](#) and 24 CFR §903.12(b). Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA’s public housing and Section 8 tenant-based assistance waiting lists. [24 CFR §903.7\(a\)\(2\)\(ii\)](#) and 24 CFR §903.12(b).

Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, the HA is making a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the HA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists.

A. Housing Needs of Families in the Jurisdiction Served by the HA

Based upon the information contained in the Consolidated Plan’s for the HA’ jurisdiction, the housing needs are contained in the following table. In the “Overall” Needs column, the estimated number of renter families that have housing needs. For the remaining characteristics in the table the HA does not have information available to rate these characteristics; therefore, N/A (not applicable) is noted since the HA cannot make this assessment.

Housing Needs of Families in the HA Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Location
Income <= 30% of AMI	1,751	N/A	N/A	N/A	N/A	N/A	N/A
Income >30% but <=50% of AMI	1,137	N/A	N/A	N/A	N/A	N/A	N/A
Income >50% but <80% of AMI	1,183	N/A	N/A	N/A	N/A	N/A	N/A
Elderly	1,131	N/A	N/A	N/A	N/A	N/A	N/A
Families with Disabilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Race/Ethnicity – White	2,240	N/A	N/A	N/A	N/A	N/A	N/A
Race/Ethnicity – Black	1,756	N/A	N/A	N/A	N/A	N/A	N/A
Race/Ethnicity – Hispanic	75	N/A	N/A	N/A	N/A	N/A	N/A
Race/Ethnicity- Other	0	N/A	N/A	N/A	N/A	N/A	N/A

The source of information used by the HA was the U. S. Census data, the Comprehensive Housing Affordability Strategy, CHAS data set 2000.

B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

Housing Needs of Families on the HA's Waiting List is as follows:

Listed below are the totals for the Public Housing and Section 8 Waiting list Combined (As of 3/16/2021)

	# of families			% of Total Families			Annual Turnover		
	PH	HCV	Total	PH	HCV	Total	PH	HCV	Total
Waiting list total	39	195	234	16.6%	83.4%	100%			
Extremely low income <=30% AMI	39	195	234	16.6%	83.4%	100%			
Very low income (>30% but <=50% AMI)	0	0	0						
Low income (>50% but <80% AMI)	0	0	0						
Families with children	10	127	137	25.6%	65.1%	58.5%			
Elderly families	2	21	23	5.1%	10.8%	9.8%			
Families with Disabilities	12	6	18	30.7%	3.1%	7.6%			
Race/ethnicity	26	150	176	66.7%	76.9%	75.2%	Black		
Race/ethnicity	13	43	46	33.3%	18.2%	19.6%	White		
Race/ethnicity	0	2	2	0.0%	1.0%	0.8%	Other		
Race/ethnicity									
Characteristics by Bedroom Size (Public Housing Only)									
1BR	27			69.2%					
2 BR	3			7.6%					
3 BR	7			17.9%					
4 BR	1			2.5%					
5 BR	0			0.0%					
5+ BR	1			2.5%					

The waiting list is currently open for Public Housing and closed for Section 8. As of March 16, 2021 there were 195 individuals/families on the Section 8 waiting list and the HA last opened its Section 8 waiting list on August 8, 2019, and the waiting list closed on August 16, 2019.

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. 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\(b\)](#) See **B1(b) above**

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\(c\)\)](#)

Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned Dollars	Planned Uses
1. Federal Grants (FY 2020 grants)		
a) Public Housing Operating Fund	\$3,988,567	Day to Day Operations
b) Public Housing CFP Funds	\$2,120,153	Capital & Management Improvements
c) Annual Contributions for Section 8 Tenant-Based Assistance – Section 8 Vouchers	\$424,593 \$72,0340	Housing Assistance Payment Administrative Fee
3. Public Housing Dwelling Rental Income		
	\$2,199,969	Day to Day Operations

Financial Resources: Planned Sources and Uses		
Sources	Planned Dollars	Planned Uses
4. Other income (list below)	\$606217	Day to Day Operations
Details of Other Income \$ Excess Utilities \$231,556 \$ Interest Income \$29,604 \$ Main. Charges & late fees \$234,800 \$ Power Pole Rental \$1,500 \$ Salvage material \$2,500 \$ Capital Fund operations \$106,256 \$ – Total \$606,217		
5. Non-federal sources (list below)	\$0	
Landmark Interest	\$10,000	
Total resources	\$9,421,533	

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\(d\)](#)) See **B1(c)** above

A. Public Housing

(1) Income Based Rent Policies

The HA's income-based rent setting policies for public housing including discretionary policies are as follows:

The HA employs discretionary policies for determining income based rent as described below:

a. Minimum Rent

- The HA's minimum rent is currently \$50.00.
- The HA has adopted discretionary minimum rent hardship exemption policies. The HA dwelling lease outlines the policy of the HA as it relates to minimum rent hardship exemptions.

b. Rents set at less than 30% of adjusted income are as follows:

HUD approved GGHA's latest request for exception flat rents on December 21, 2017. The PHA requested an exception flat rent for all bedroom sizes, except for 1-bedroom units, in Northside Homes-AL049-008.

The Flat Rents are as follows: **Colley Homes – Non Renovated Units:** 1 Br \$315, 2 Br \$426, 3 Br \$519, 4 Br \$597 and 5 Br \$675 and **Renovated Phase 1 Units:** 1 Br \$349, 2 Br \$458, 3 Br \$549, 4 Br \$631 and 5 Br \$714; **Renovated Phase 2 Units:** 1 Br \$371, 2 Br \$481, 3 Br \$573, 4 Br \$659 and 5 Br \$745; **Carver Village:** 1 Br \$286, 2 Br \$381, 3 Br \$465, 4 Br \$535 and 5 Br \$605; **Emma Sansom Homes:** 1 Br \$294, 2 Br \$390, 3 Br \$473, 4 Br \$544 and 5 Br \$615; **Gateway Village:** 1 Br \$294, 2 Br \$375, 3 Br \$447, 4 Br \$514; **Campbell Court:** 1 Br \$291, 2 Br \$360 3 Br \$415; **Starnes Park:** 1 Br \$291, 2 Br \$362, 3 Br \$419 and **Northside Homes:** 1 Br \$238 and 2 Br \$326.

- The HA uses discretionary (optional) deductions and/or exclusions as follows:
- For the earned income of a previously unemployed household member (Ref. Appendix A Definitions section of ACOP for - Income Exclusions)
- For increases in earned income - (Ref. Appendix A Definitions section of ACOP for – Income Exclusions)
- TTP Deduction at Move-In: (**Currently suspended**) To help reduce the number of vacancies the HA amended the Admissions and Continued Occupancy Policy (ACOP) and added a permissive Total Tenant Payment (TTP) Deduction at Move-In on August 23, 2005, and effective September 1, 2005. HUD approved the permissive TTP deduction amendment to the ACOP on August 12, 2005. The ACOP was amended to provide for a TTP rent deduction, of up to two months, at initial move-in. The amendment is contained in Section XV - D (3) of the ACOP, and is summarized below:

Total Tenant Payment (TTP) Deduction at Move-In: The HA may deduct the TTP for any new move-in at certain development(s) (see worksheet below) that has a TTP of \$1 or more for up to two months at initial move-in (at this time the HA decided not to grant a deduction). Therefore, if the GGHA reinstates the deduction, any eligible applicant for housing within a development that has a vacancy percentage of 2 percent or more qualifies to receive the one-month TTP deduction. To be eligible for the TTP deduction the head of household and or any adult member listed on the dwelling lease must not have received this deduction at any time from the HA in the past. Also, the HA will determine when it is granting a one

month or two-month TTP deduction. The determination was made at this time that a one-month TTP deduction is being allowed to evaluate its effectiveness in reducing vacancies. The HA has documented its decision to offer the TTP deduction for one month and the worksheet (listed below) is completed on the first working day of each month and posted in each office of the HA. The HA may suspend and/or start the TTP deduction at any time based on the overall vacancy totals of the HA and/or the effectiveness of allowing the TTP deduction, which will be determined by the eviction rate of new move-ins that receive the TTP deduction and/or the number of applications received has increased and allowing the TTP deduction is not necessary for the HA to maintain an overall vacancy percentage of three percent or less. If the TTP deduction is suspended and/or started it will be done on the first working date of a particular month and all applicants that applied for public housing within a public housing development that qualified for a TTP deduction will be entitled to the TTP deduction even though they may not be housed until after the date the TTP deduction is suspended. The determining date for eligibility is the application date, not the date housed. Also, the decision to suspend the TTP deductions will be made on the first working day of each month, which is the date the worksheet (blank worksheet listed below) for the TTP deduction, is posted.

The following worksheet is completed as detailed above indicates, which communities qualify for “Rent Deduction”

MONTH	Year		
Development Name	Units Available for Occupancy	Occupied Units	Vacancy Percentage
Colley Homes	220		
Carver Village	159		
Emma Sansom	220		
Gateway Village	106		
Campbell Court	150		
Starnes Park	102		
Northside Homes	12		
Totals	970		

NOTE: This is a blank chart, and it is completed on the 1st working day of each month with actual vacancy data, which will indicate which development, qualifies for the TTP deduction.

d. Ceiling rents

The HA retained Ceiling Rents when the Flat Rents were adopted on October 1, 2002, and the Ceiling Rents are adjusted to the level of the updated Flat Rents in accordance with Federal Requirements. The Ceiling Rents are applicable to all developments as appropriate.

e. Rent re-determinations:

Rent reexaminations must be reported by tenants any time the family experiences an income increase – (Ref. Section III D of the Dwelling Lease, except for families on Flat Rent. Re-examination of family income for families on a Flat Rent is only required to be conducted at least once every three years. Also, tenants are to report decreases in income any time the family experiences a decrease in income.

(2) Flat Rents

The HA requested exception rents in 2016 that were approved by HUD on September 14, 2016. The HA requested exception rents for 2017 on December 16, 2016, based on a new study and HUD approval on February 21, 2017. A request for 2018 was emailed on October 9, 2017, for the same units and approved December 21, 2017. A request for 2019 was emailed on November 13, 2018, and approved February 25, 2019. A two-year extension of the 2019 was requested on October 2, 2019 and approved by HUD on November 8, 2019.

B. Section 8 Tenant-Based Assistance

(1) Payment Standards

- a. The HA's payment standards were adjusted to 100% of the FMR for the current year. Most participants who rent units the same size as their voucher are able to rent within the payment standards.
- b. The HA reevaluates the payment standards annually. The factors used by the HA in its assessment of the adequacy of its payment standard are 1) success rates of assisted families and 2) rent burdens of assisted families. During the past calendar year, the HA was able to utilize over 95% of its assigned annual HAP and no documented cases of rent burdens to assisted families due to the payment standard; therefore, the HA only adjusted payment standards to the new FMR.

(2) Minimum Rent

- a. The HA's minimum rent is currently \$50.00.
- b. The HA's Section 8 Administrative Plan outlines the policy of the HA as it relates to minimum rent hardship exemptions.

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. ([24 CFR §903.7\(k\)](#) and 24 CFR §903.12(b). **None of the programs listed above are administered by the PHA**

Safety and Crime Prevention (VAWA). A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#)) **The HA supports the Violence Against Women and Justice Department Reauthorization Act (VAWA) 2005 and implemented procedures that prohibits the eviction of victims of domestic violence, dating violence, sexual assault, or stalking as those terms are defined in Section 3 of the United States Housing Act 1937 as amended by VAWA (42 U.S.C. 13925). Additional crime and safety prevention measures include:**

- Contracting with the City of Gadsden Police Department for the services of four police officers to work exclusively within public housing. The program is called the Community Policing Program (COP). The COP program focus is on crime prevention and drug/gang prevention activities.
- Works with non-profit organizations who work with at-risk youth, adults, or seniors anti-drug and gang activity programs
- The HA also has Decorative Security fencing in Campbell Court, Gateway Village and Starnes Park and extra security lighting in all seven communities to help improve safety and security.

GGHA also coordinates with the local police as follows:

- COP Officers are involved in the development, implementation, and/or ongoing evaluation of drug-elimination plan
- COP Officers provide crime data to housing authority staff for analysis and action by development
- COP Officers have established a physical presence on housing authority property by working exclusively in Gadsden's public housing.
- COP Officers regularly testify in and otherwise support eviction cases
- COP Officers regularly meet with the HA management and residents
- The HA executes an annual agreement with the City of Gadsden for policing services that are over and above the baseline law enforcement services required by the Cooperation Agreement.
- COP Officers are notified of any VAWA issues and additional patrols in the area are made, if determined necessary.

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#)) **The final rule concerning Pet Ownership in Public Housing was published in the federal register on July 10, 2000. The Birmingham HUD office had approved a Pet Policy governing the ownership of pets in public housing for Public Housing Authorities. This policy was posted for resident comment and presented to the Resident Advisory Board for review and comment. After modifying the Pet Policy to reflect comments made during the comment period the Pet Policy was adopted on August 29, 2000. The Admissions and Continued Occupancy Policy was amended to incorporate the pet policy. Also, approved was a Lease addendum for residents to execute that are approved for pet ownership. The HA Pet policy was revised on May 30, 2017, to decrease the fees for pets and an Assistance Animal Policy was adopted.**

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#)) **Substantial Deviation is defined in the HA's 5-Year Plan form HUD-50075-5Y as,**

"A "substantial deviation" to the 5-Year Plan is an overall change in the direction of the Authority pertaining to the Authority's mission and goals. For example, deleting an existing mission/goal or adding a new mission/goal for the HA would constitute a substantial deviation. The HA does not plan to have any Substantial Deviation to the Annual or 5-Year Plan."

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any

change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii)) **See Below:**

Significant Amendment/Modification. A "Significant Amendment or Modification" to the Annual Plan is a substantial change in a policy or policies pertaining to the operation of the Authority. This includes the following: Significant changes to the rent or admission policies outlined in the Authority's Admissions and Continued Occupancy Policy or Section 8 Administrative Plan (example: Change to Tenant Selection and Assignment Policy). Changes regarding demolition, disposition, designation or conversion activities. Substantial changes to any proposed activities or policies described in the agency plan that would significantly affect services or programs provided to residents (Example: Discontinuing the COP program). This definition does not include budget revisions, changes in organizational structure, changes resulting from HUD-imposed regulations, or minor policy changes.

Capital Fund Program Definition: The addition of a proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposal. Adding a new Capital Fund Project or work item to the Plan that would require more than 5% of the annual Capital Fund appropriation. Emergencies and repairs needed as part of ongoing CFP work (example: termite damage) are not considered significant amendments/Modifications.

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)) **See policy in Section B.1(b)**

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

Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30) **None planned in the current year**

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30) **GGHA continues to explore the possibility of mixed finance but no specific actions are planned in the current year**

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, 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; 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. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h)) **The HA is not planning any demolition and/or disposition activities.**

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j)) **Not Applicable – None required**

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b)) **See section B2 above**

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). **See section B2 above**

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

B.4 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)) **No Findings**

C. Other Document and/or Certification Requirements

C.1 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 SM-HP.

C.2 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, 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 AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local

jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#))

C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to 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](#)) **See Attachment a1049b01**

C.4 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#))

D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR 903.7 \(g\)](#))

D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: **See Section D.1 approved by HUD on 5/19/2020.**

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. 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, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 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. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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