

<b>Streamlined Annual PHA Plan</b> <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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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, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

**Applicability.** The Form HUD-50075-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 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, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> <b>PHA Name:</b> <u>Greater Gadsden Housing Authority</u> <span style="float: right;"><b>PHA Code:</b> <u>AL049</u></span>  <b>PHA Type:</b> <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <u>7/1/2023</u>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <u>974</u> <b>Number of Housing Choice Vouchers (HCVs)</b> <u>194</u>  <b>Total Combined</b> <u>1168</u>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission         </p> <p> <b>Availability of Information.</b> 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> <b>All Resident Council presidents were provided a copy of the PHA Plan. The PHA Plan was posted in all site offices and the Central Office of the PHA, on the GGHA WEB site and the GGHA Facebook page. The public was advised that additional information, concerns, recommendations, etc. should be requested from or submitted to the GGHA Central Office at 422 Chestnut Street or by calling (256) 547-2501.</b> </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)         </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>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last <b>Annual PHA Plan</b> 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</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) 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"> <li>• 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.</li> <li>• Public housing developments, which house only elderly persons or persons with disabilities, or both.</li> <li>• Public housing developments, which consist of only one general occupancy family public housing development.</li> <li>• Public housing developments approved for demolition or conversion to resident-based assistance.</li> <li>• Mixed financing developments.</li> </ul> <p>C. Actions: To accomplish the deconcentration goals, the HA will take the following actions:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. To accomplish the goals of deconcentration: <ol style="list-style-type: none"> <li>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,</li> <li>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.</li> </ol> </li> </ol> <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><b>The Deconcentration Policy for Section 8 Housing Choice Voucher Program</b> is contained in the Section 8 Administrative Plan in SECTION XXXVIII as follows:</p> <p><b>XXXVIII - DECONCENTRATION RULE</b></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>

	<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.</p>
<p><b>B.2</b></p>	<p><b>New Activities.</b></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 checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers 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><b>Mixed Finance Development; Demo/Dispo; RAD</b> – We are looking at redeveloping Starnes Park (AL049-6) a 102-unit development using one or more of these methods. We are looking to hire a consultant to review all possible scenarios for redeveloping this complex and want to have all available options on the table. We intend to replace all units reconfiguring the bedroom sizes to more closely match the needs of the complex and the demand for units in Gadsden. Detailed meetings will be held with current residents and the public as plans are solidified.</p> <p><b>Project-Based Vouchers</b> – GGHA will be looking for opportunities to use Project-Based Vouchers to increase housing opportunities for voucher holders, increase affordable housing and to serve specific populations including Veterans and the Homeless.</p> <p><b>Other:</b> 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><b>Vacancies for Modernization</b> – 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 24.</p> <p><b>Other Capital Grant Programs</b> GGHA is looking at applying for any new grants proposed under the 2023 funding bills and may consider Capital Funding Financing as part of the proposed redevelopment of Starnes Park above.</p>
<p><b>B.3</b></p>	<p><b>Progress Report.</b></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 <b>meeting and/or exceeding all 10 goals outlined in the Five-year plan</b></p>
<p><b>B.4.</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>HUD approved the GGHA's revised 5-Year Action Plan (HUD-50075.2) for years 2022 thru 2026 in EPIC on 7/21/2022 and the 2022 Annual Statement has been submitted in the EPIC system. The GGHA anticipates submitting a new 5-Year Action Plan (HUD-50075.2 for years 2024 thru 2027 and a 2023 Annual Statement via EPIC to HUD for approval in Summer of 2023 (awaiting instructions from HUD). The draft of these documents was included in the resident meetings and public hearing for this annual plan.</p>

B.5	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. Ref: Attachment a1049b01</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD-50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p><b>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p><a href="#">Form 50077-ST-HCV-HP</a>, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p><b>D. Affirmatively Furthering Fair Housing (AFFH).</b></p>	
D.1	<p><b>Affirmatively Furthering Fair Housing.</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete</p>

this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

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

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

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

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

**B. Plan Elements.**

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

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

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

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

**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) in 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 11/30/2022)

	# of families			% of Total Families			Annual Turnover		
	PH	HCV	Total	PH	HCV	Total	PH	HCV	Total
Waiting list total	58	299	357	16.2%	83.8%	100%			
Extremely low income <=30% AMI	52	242	294	14.6%	67.8%	82.4%			
Very low income (>30% but <=50% AMI)	4	37	41	1.1%	10.4%	11.5%			
Low income (>50% but <80% AMI)	2	20	22	0.5%	5.6%	6.1%			
Families with children	21	212	233	5.9%	59.4%	65.3%			
Elderly families	9	13	28	2.5%	3.6%	6.1%			
Families with Disabilities	15	0	26	4.2 %	0.0%	4.2%			
Race/ethnicity	31	261	292	8.6%	73.1%	81.7%	Black		
Race/ethnicity	27	37	64	7.6%	10.4%	18.0%	White		
Race/ethnicity	0	4	4	0.0%	1.1%	1.1%	Other		
Race/ethnicity									
Characteristics by Bedroom Size (Public Housing Only)									
1BR	31			53.4%					
2 BR	18			31.0%					
3 BR	8			13.8%					
4 BR	1			1.7%					
5 BR	0			0.0%					
5+ BR	0			0.0%					

The waiting list is currently open for Public Housing and closed for Section 8. As of November 30, 2022, there were 299 individuals/families on the Section 8 waiting list and the HA last opened its Section 8 waiting list on September 14 - 22, 2022, and the waiting list closed on closed at 5:00pm September 22, 2022.

**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\(b\)](#)

**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: Planned Sources and Uses		
Sources	Planned Dollars	Planned Uses
<b>1. Federal Grants (FY 2021 grants)</b>		
a) Public Housing Operating Fund	\$4,262,382	Day to Day Operations
b) Public Housing CFP Funds	\$2,589,485	Capital & Management Improvements
c) Annual Contributions for Section 8 Tenant-Based Assistance –Section 8 Vouchers	\$559,746 \$88,229	Housing Assistance Payment Administrative Fee
<b>3. Public Housing Dwelling Rental Income</b>		
	\$2,308,800	Day to Day Operations

Financial Resources: Planned Sources and Uses		
Sources	Planned Dollars	Planned Uses
<b>4. Other income</b> (list below)	\$606,217	Day to Day Operations
<b>Details of Other Income</b> \$ Excess Utilities \$198,793 \$ Interest Income \$20,265 \$ Main. Charges & late fees \$247,594 \$ Power Pole Rental \$1,500 \$ Salvage material \$2,500 \$ Capital Fund operations \$106,256 \$ – Total \$576,908		
<b>5. Non-federal sources</b> (list below)	\$0	
Landmark Interest	\$1,000	
<b>Total resources</b>	\$10,386,550	

**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\(d\)](#))

## 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:

We have requested exception flat rents approvals from HUD for Starnes Park and Campbell Court. Due to increases in rent in the market all other location Flat Rents are based on HUD's Fair Market Rent Calculation Method. The Flat Rent amounts are listed below:

The Flat Rents are as follows: **Colley Homes – Non Renovated Units:** 2 Br \$569, 3 Br \$726, 4 Br \$770 and 5 Br \$889 and **Renovated Phase 1 Units:** 1 Br \$483, 2 Br \$569; **Renovated Phase 2 Units:** 1 Br \$502 2 Br \$590, 3 Br \$750, 4 Br \$798 and 5 Br \$920; **Carver Village:** 1 Br \$419, 2 Br \$482, 3 Br \$630, 4 Br \$658, and 5 Br \$771; **Emma Sansom Homes:** 1 Br \$419, 2 Br \$484, 3 Br \$630, 4 Br \$658 and 5 Br \$771; **Gateway Village:** 1 Br \$422, 2 Br \$490, 3 Br \$631, 4 Br \$680; **Campbell Court:** 1 Br \$460, 2 Br \$536 3 Br \$597; **Starnes Park:** 1 Br \$455, 2 Br \$534, 3 Br \$597 and **Northside Homes:** 1 Br \$330 and 2 Br \$366.

- 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 if 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 it's 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	222		
Carver Village	159		
Emma Sansom	220		
Gateway Village	106		
Campbell Court	150		
Starnes Park	102		
Northside Homes	12		
Totals	971		

**NOTE: This is a blank chart, and it is completed on the 1<sup>st</sup> 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. A request for exception rents for Campbell Court and Starnes Park for 2022 was emailed in December and approved by HUD on February 2, 2022 and became effective February 1, 2022. All other development's flat rents will be based on HUD's Fair Market Rent Method and were effective January 1, 2022. A request for

exception rents for Campbell Court and Starnes Park for 2023 was emailed on October 31, 2022 and is awaiting approval by HUD. All other development's flat rents will be based on HUD's Fair Market Rent Method and will be effective January 1, 2023

## **B. Section 8 Tenant-Based Assistance**

### **(1) Payment Standards**

- a. The HA's payment standards were adjusted to 105% of the FMR effective January 1, 2023, for the current year.
- b. The HA reevaluates the payment standards at least 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.

### **(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.
- Security Cameras were originally installed in all developments in 2021. Additional cameras were added in 2022.
- 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\(r\)\(2\)\(i\)](#))

[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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices. **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\(b\)](#))

**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: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6). ([Notice PIH 2011-47](#)) **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: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hope6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4) **GGHA continues to explore the possibility of mixed finance anticipates hiring a consultant to begin planning activities for Starnes Park (AL049-6) in the current year**

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

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

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#) **This is one option to be explored by the consultant proposed above**

**Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) 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. **See section B2 above**

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#). **GGHA generally has 18-24 units vacant that are in HUD approved modernization status at any time. These are units in AL049-1, Colley Homes that are undergoing a comprehensive renovation using force account labor. The renovations are on schedule after required adjustments for COVID related delays beyond the PHA control.**

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). **None**

**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 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved.

PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX." See **section B.4 above**

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#)) **No findings**

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

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#)) See **Attachment a1049b01**

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

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

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

### D. Affirmatively Furthering Fair Housing.

#### D.1 Affirmatively Furthering Fair Housing.

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

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. 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 7.02 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.