

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification.

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

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

Housing Opportunities Through Modernization Act (HOTMA) – The GGHA Board approved revised ACOP and HCV Admin Plans on July 30, 2024, with implementation at a future date based on HUD implementation guidance. These changes were posted for comments and notice of implementation will be provided prior to implementation. These changes include the following: • Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination unless there has been a prior rent reduction, • The Earned Income Disregard (EID) was eliminated as of January 1, 2024. • Adults Only Need to Sign Consent Form (HUD-9886) once (currently required yearly). Can be revoked by the resident but would result in termination. • Increased Standard Deduction for Elderly/Disabled Households • New income exclusions • Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home. • Veterans' aide and attendant care. • Distributions of principal from non-revocable trusts, including Special Needs Trusts. • Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years at 5% and 7.5% for families currently receiving the deduction. • Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief (90 days) to families unable to pay rent because of unanticipated medical/disability expenses or other unexpected circumstances and families who are no longer eligible for the childcare expense deduction who still need childcare due to extenuating circumstances. • Asset Changes • Raised Threshold for Imputing Asset Income from \$5,000 to \$50,000. • Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility. Families are also ineligible for assistance if they own real property suitable for occupancy. GGHA will not enforce this limit at reexamination. • Exclusion of Retirement and Educational Savings Accounts from assets. • Allows for self-certification of assets under \$50,000 except for every third year. The actual date of implementation and the effective date of revised policies had not been determined at this time. Implementation and notice will be based on the HUD required notice period for HOTMA.

Rent Determination.

HOTMA – New HUD requirements will go into effect based on HUD guidelines for implementation, providing changes to rent reexaminations. Residents will still be required to report all income, family members and deduction changes but interim reexaminations will only be processed when required by HOTMA regulations (generally at least a 10 percent change in adjusted income). Additionally, Flat rents have been updated based on HUD requirements for CY 2025. See below: The Flat Rents are as follows: Colley Homes – Non Renovated Units: 2 Br \$692, 3 Br \$841, and 4 Br \$926; Renovated Phase 1 Units: 1 Br \$590, 2 Br \$692; Renovated Phase 2 Units: 1 Br \$609, 2 Br \$713, 3 Br \$865, 4 Br \$953 and 5 Br \$1,099; Carver Village: 1 BR \$528, 2 Br \$608, 3 Br \$748, 4 Br \$793 and 5 Br \$954; Emma Sansom Homes: 1 Br \$544, 2 Br \$626, 3 Br \$764, 4 Br \$841, and 5 Br \$981; Gateway Village: 1 Br \$531, 2 Br \$615, 3 Br \$749 and 4 Br \$834; and Northside Homes: 1 Br \$428 and 2 Br \$479. The proposed exception flat rents awaiting HUD approval: Campbell Court: 1 Br \$540, 2 Br \$617 and 3 Br \$685 and Starnes Park: 1 Br \$537, 2 Br \$617 and 3 Br \$687. Section 8 Tenant-Based Assistance (1) Payment Standards a. The HA's payment standards were adjusted to 108.4% of the FMR effective January 1, 2025, 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.

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

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

The Deconcentration Policy for Public Housing is contained in the Admissions and Continue Occupancy Policy (ACOP) in Section XIX: Deconcentration Rule (See attachment): The Deconcentration Policy for Section 8 Housing Choice Voucher Program is contained in the Section 8 Administrative Plan in SECTION XXXVIII (See attachment);

B.2 New Activities.

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

Y N

- Hope VI or Choice Neighborhoods
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the 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

Mixed Finance Modernization or Development.

GGHA hired a consultant to provide options for the redevelopment of Starnes Park (AL049-6) a 102-unit development (16 – one bedroom; 63 - two bedroom and 23 - three bedroom). There were two scenarios that showed the most promise to the consultant and GGHA. Scenario #1 would be the total demolition and rebuilding of the site using 9% tax credits under a RAD/Section 18 Blend. Scenario #2 would be a total rehabilitation of the existing units using 4% tax credits

under a RAD/Section 18 blend. A third scenario would require combining of a portion of Colley Homes with Starnes Park using 4% tax credit which would raise more capital for the renovation work. GGHA is currently working with the City to acquire a piece of property in the neighborhood to rebuild (Scenario 1) the units using nine percent tax credits with disposition of the current site. The highway extension and the lack of available relocation housing makes rebuilding on the existing site undesirable and prohibitive based on these factors. GGHA plans to submit a Section 18 application, request replacement vouchers and project base the vouchers at the new development. GGHA also aims to reconfigure the bedroom sizes to match the needs of the complex more closely (many families are currently over-housed, and the demand is for smaller units in Gadsden). The majority of units will continue to be designated for the elderly and disabled. All families currently living in Starnes Park will have the right to return to the new complex or choose another GGHA property for relocation. If GGHA determines that that demolition/disposition with new construction is not possible, a substantial renovation will be completed using 4 percent or 9 percent tax credits.

Demolition and/or Disposition.

Currently there are two items on the agenda: 1. Disposition of a portion of the vacant land (approximately 5.3 acres) at Starnes Park to the Alabama Department of Transportation to be used as right of way for a highway 759 extension (Negotiating to avoid eminent domain proceedings). A disposition application will be submitted once environmental and other required actions are complete. Several meetings have been held with residents to discuss this disposition, and additional meetings will be held with current residents and the public as plans are solidified. 2. Two units in Starnes Park are out of occupancy due to foundation issues and we will submit a demolition application if the redevelopment using 9 percent tax credits does not work out (also see mixed finance above)

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.

While we do not plan to use RAD at this time for Starnes Park (Section 18 with replacement Vouchers), RAD is still a possibility based on the financial implications at the time of submission of an application. See mixed finance comments.

Project Based Vouchers.

GGHA has been in preliminary talks with two developers that received nine percent tax credit awards and have some interest in a limited number of PBVs. This would allow GGHA to use current HAP reserves that have accumulated due to a lack of available housing and provide additional housing to applicants. Looking at a total of 20-25 vouchers.

Units with Approved 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 24 and all units in Colley should be completed in calendar year 2025. We will be moving to Carver Village as Colley Homes is completed and units in Carver Village will begin to be placed in Mod status in late 2024 or the first half of 2025 (This was also in the prior year plan).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

GGHA plans to continue applying for safety and security grants until funded and any new grants that would be beneficial under the 2025 funding bill

B.3	<p>Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. 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, 2025. As of this date, the HA is fully meeting and/or exceeding 8 of the 10 goals outlined in the Five-year plan. Under goal V-B, in 2021 only 70% of new admissions to the HCV Program were extremely low-income and under goal IV-C, only 132 units were completed under modernization. See attachment for details.</p>
B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. HUD approved the GGHA's revised 5-Year Action Plan (HUD-50075.2) for years 2024 through 2028 in EPIC on 7/17/2024 and the 2024 Annual Statement has been submitted in the EPIC system. The GGHA anticipates submitting a new 5-Year Action Plan (HUD-50075.2 for years 2026 through 2029 and a 2025 Annual Statement via EPIC to HUD for approval in Summer of 2025 (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>Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, please describe:</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y <input checked="" type="checkbox"/> N <input type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attachment for RAB</p>
C.2	<p>Certification by State or Local Officials. <u>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. <u>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</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). 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 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.

Form identification: AL049-Greater Gadsden Form HUD-50075-HP (Form ID - 2724) printed by Greg Price in HUD Secure Systems/Public Housing Portal at 01/06/2025 05:38PM EST

Deconcentration Policies

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:

- 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.
- B. Exemptions: The following are exempt from this rule.
- Public housing development with fewer than 100 public housing units. A covered development is defined as any single development or contiguous developments that total over 100 units.
 - Public housing developments, which house only elderly persons or persons with disabilities, or both.
 - Public housing developments, which consist of only one general occupancy family public housing development.
 - Public housing developments approved for demolition or conversion to resident-based assistance.
 - Mixed financing developments.
- C. Actions: To accomplish the deconcentration goals, the HA will take the following actions:
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:
 - 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.

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.

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.

The Deconcentration Policy for Section 8 Housing Choice Voucher Program is contained in the Section 8 Administrative Plan in SECTION XXXVIII (Will be Section XXXVII when HOTMA Policy is implemented) as follows:

XXXVIII - DECONCENTRATION RULE

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 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.