

Y N

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

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

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, but we are still awaiting HUD implementation guidance for all provisions. HUD required implementation of select sections of HOTMA which were incorporated into the current ACOP and Administrative Policy effective July 1, 2025. These changes include the following: • New Definitions • New income exclusions • 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). It can be revoked by the resident but would result in termination. • Added De Minimis Errors and how they are treated. The following are still awaiting HUD implementation guidance: • 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, • Increased Standard Deduction for Elderly/Disabled Households • 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 o Raised Threshold for Imputing Asset Income from \$5,000 to \$50,000. o 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. o Exclusion of Retirement and Educational Savings Accounts from assets. o Allows for self-certification of assets under \$50,000 except for every third year. See attachment for specific Changes.

Rent Determination.

HOTMA – The remaining New Hud requirements (See above) 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 2026. See below: The Flat Rents are as follows: Colley Homes –Renovated Phase 1 Units: 1 Br \$582, 2 Br \$684; Renovated Phase 2 Units: 1 Br \$601, 2 Br \$705, 3 BR \$857, 4 Br \$1,001 and 5 Br \$1,154; Carver Village: 1 BR \$520, 2 Br \$600, 3 Br \$740, 4 Br \$865 and 5 Br \$1,009; Renovated units: 1 BR \$601, 2 BR \$705, 3 BR \$857, 4BR \$1,001 and 5 BR \$1,154; Emma Sansom Homes: 1 Br \$520, 2 Br \$602, 3 Br \$740, 4 Br \$865, and 5 Br \$1,009; Gateway Village: 1 Br \$523, 2 Br \$607, 3 Br \$741 and 4 Br \$886; and Northside Homes: 1 Br \$420 and 2 Br \$471. The proposed exception flat rents awaiting HUD extension 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 did not change except the 1BR was reduced to 110 percent of the new FMR effective January 1, 2025, to be within HUD compliance 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) FMR, 2) success rates of assisted families and 3) 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 applicable Fiscal Year?

Y N

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

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

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)

Designated Housing for Elderly and/or Disabled Families.

The HA applied for approval to designate certain units of public housing for occupancy only by the elderly families and families with disabilities. There are 112 units at Campbell Court (AL09P049005) and 82 units at Starnes Park (AL09P049006) that have been approved by HUD for occupancy of the elderly and disabled. The occupancy type for

these units was approved as mix-population (elderly and disabled) on February 9, 2016, (extended 2/9/26 to 2/9/2028) by HUD; therefore, the elderly and disabled are the only applicants for the one- and two-bedroom units at these developments. Number of units affected by the designation: Campbell Court has a total of 150, there are 22 one-bedroom units and 90 two-bedroom units for a total 112 units in Campbell Court that have been designated for occupancy by the elderly and disabled. Starnes Park has a total of 102, there are 16 one-bedroom units and 63 two-bedroom units plus three three-bedroom units for a total 82 units in Starnes Park that have been designated for occupancy by the elderly and disabled. This represents a total of 194 units that have been approved for occupancy by the elderly and disabled. (Renewal submitted 12/3/2025)

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.

Units with Approved Vacancies for Modernization.

Ongoing modernization of Carver Village (AL049-2) 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

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

GGHA is looking at applying for any new grants proposed under the 2026 funding bills

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

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 will end on June 30, 2029. As of this date, the HA is meeting and/or exceeding all 10 goals outlined in the Five-year plan.

B.4 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

HUD approved the GGHA's revised 5-Year Action Plan (HUD-50075.2) for years 2026 through 2030 in EPIC on 9/30/2025 and the 2025 Annual Statement has been submitted in the EPIC system. The GGHA anticipates submitting a new 5-Year Action Plan (HUD-50075.2 for years 2027 through 2030 and a 2026 Annual Statement via EPIC to HUD for approval in Summer of 2026 (awaiting instructions from HUD). The draft of these documents was included in the resident meetings and public hearing for this annual plan.

B.5 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) have comments to the PHA Plan?

Y N

	(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.
C.2	Certification by State or Local Officials. 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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <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.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> (b) If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y <input type="checkbox"/> N <input type="checkbox"/> N/A <input type="checkbox"/> (b) If yes, please describe:

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

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

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

Form identification: AL049-Greater Gadsden Form HUD-50075-ST (Form ID - 7674) printed by Greg Price in HUD Secure Systems/Public Housing Portal at 02/16/2026 03:14PM EST

**Admissions and Continued Occupancy Policy (ACOP) Addendum
Greater Gadsden Housing Authority (GGHA)
This Addendum is being Executed in Accordance Notice PIH 24-38
Effective July 1, 2025**

The following provisions are being added to the GGHA ACOP dated April 30, 2019, via this addendum to comply with Notice PIH 24-38 and be effective July 1, 2025. These provisions are included in the ACOP approved by the Board on June 30, 2024, which cannot be implemented until HUD completes updates to its computer system. HUD has determined that the implementation of the changes included below are not subject to HUD system updates.

Earned Income Disregard (EID) - Effective January 1, 2024, this disregard was eliminated.

Income Exclusions – The list of income exclusions in the definition section of the ACOP is deleted and new list (see attachment 1) replaces it.

- See attachment Number 1 to this addendum

Definitions – The following definitions are added/revised:

- **Earned Income** - Income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Earned income does not include any pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare, social security, and governmental subsidies for certain benefits), or any cash or in-kind benefits.
- **Unearned income** - Any annual income, as calculated under § 5.609, that is not earned income (see earned income definition above).
- **Family** – Includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
 - A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person:
 - An otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older:
 - A group of persons residing together, and such group includes, but is not limited to:
 - A family with or without children (a child who is temporarily away for the home because of placement in foster care is considered a member of the family)
 - An elderly family
 - A near-elderly family
 - A displaced family
 - The remaining member of a tenant family

Note: By definition, a family must contain a competent adult of at least 18 years of age to enter into a contract and capable of functioning as the head of the household.

- Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR § 5 and 960]
- Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not family members and have no rights of tenancy or continued occupancy.
- Foster Care Arrangements include situations in which the family is caring for a foster

adult, child, or children in their home who have been placed there by a public child placement agency, or a foster adult or adults placed in the home by a public adult placement agency. For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity to execute a lease.

- **Day Laborer** - An individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future.
- **Dependent** - A member of the family (which excludes foster children and foster adults) other than the family head or spouse who is under 18 years of age, or is a person with a disability, or is a full-time student. [24 CFR 5.603] An unborn child shall not be considered a dependent.
- **Foster Child** - a member of the household who meets the definition of a foster child under state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.
- **Foster Adult** - A member of the household who is 18 years of age or older and meets the definition of a foster child under State law. In general, a foster adult is unable to live independently due to a debilitating physical or mental condition and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.
- **Health and medical care expenses** - Any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.
- **Minor** - A member of the family, other than the head of family or spouse, who is under 18 years of age.

De Minimis errors - PHAs will not be considered out of compliance solely due to de minimis errors in calculating family income. De minimis errors occur when a PHA's determination of a family's income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (or \$360 in annual adjusted income).

If an error occurred in the calculation of income that results in the family overpaying rent, the amount of overpayment retroactive until the effect date of the error will be credited to the tenant account. The family may request a refund of the credit amount that exceeds charges due in the next 30 days or the credit will be applied to future charges.

Enterprise Income Verification (EIV) – EIV is no longer required to be used during interim reexaminations but at the HA's discretion may be used when other sources are unavailable or disputed.

Federal Privacy Act Statement (Form HUD 9886-A) – The HA is using the new Federal Privacy Act Statement, which includes the changes below:

- The executed consent form will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to the PHA to revoke consent.
- Families have the right to revoke consent by notice to the PHA; however, revoking consent will result in termination or denial of assistance.

Attachment Number 1

INCOME EXCLUSION LIST

(1) Any imputed return on an asset when net family assets total \$50,000 or less (which amount HUD will adjust annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers) and no actual income from the net family assets can be determined.

(2) The following types of trust distributions:

(i) For an irrevocable trust or a revocable trust outside the control of the family or household excluded from the definition of net family assets under § 5.603(b):

(A) Distributions of the principal or corpus of the trust; and

(B) Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.

(ii) For a revocable trust under the control of the family or household, any distributions from the trust; except that any actual income earned by the trust, regardless of whether it is distributed, shall be considered income to the family at the time it is received by the trust.

(3) Earned income of children under 18 years of age.

(4) Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments.

(5) Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation.

(6) Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member.

(7) Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a member of the family becoming disabled.

(8) Income of a live-in aide, foster child, or foster adult as defined in §§ 5.403 and 5.603, respectively.

(9)(i) Any assistance that section 479B of the Higher Education Act of 1965, as amended (20 U.S.C. 1087uu), requires be excluded from a family's income; and

(ii) Student financial assistance for tuition, books, and supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, and other fees required and charged to a student by an institution of higher education (as defined under Section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002)) and, for a student who is not the head of household or spouse, the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

(A) Student financial assistance, for purposes of this paragraph (9)(ii), means a grant or scholarship received from—

(1) The Federal government.

(2) A State, Tribe, or local government.

(3) A private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3);

(4) A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or

(5) An institution of higher education.

(B) Student financial assistance, for purposes of this paragraph (9)(ii), does not include—

(1) Any assistance that is excluded pursuant to paragraph (b)(9)(i) of this section.

(2) Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded pursuant to paragraph (b)(9)(i) of this section);

(3) Gifts, including gifts from family or friends; or

(4) Any amount of the scholarship or grant that, either by itself or in combination with assistance excluded under this paragraph or paragraph (b)(9)(i), exceeds the actual covered costs of the student. The actual covered costs of the student are the actual costs of tuition, books and supplies (including supplies and equipment to support students with learning disabilities or other disabilities),

room and board, or other fees required and charged to a student by the education institution, and, for a student who is not the head of household or spouse, the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit. This calculation is described further in paragraph (b)(9)(ii)(E) of this section.

(C) Student financial assistance, for purposes of this paragraph (b)(9)(ii) must be:

(1) Expressly for tuition, books, room and board, or other fees required and charged to a student by the education institution;

(2) Expressly to assist a student with the costs of higher education; or

(3) Expressly to assist a student who is not the head of household or spouse with the reasonable and actual costs of housing while attending the education institution and not residing in an assisted unit.

(D) Student financial assistance, for purposes of this paragraph (b)(9)(ii), may be paid directly to the student or to the educational institution on the student's behalf. Student financial assistance paid to the student must be verified by the responsible entity as student financial assistance consistent with this paragraph (b)(9)(ii).

(E) When the student is also receiving assistance excluded under paragraph (b)(9)(i) of this section, the amount of student financial assistance under this paragraph (b)(9)(ii) is determined as follows:

(1) If the amount of assistance excluded under paragraph (b)(9)(i) of this section is equal to or exceeds the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section, none of the assistance described in this paragraph (b)(9)(ii) of this section is considered student financial assistance excluded from income under this paragraph (b)(9)(ii)(E).

(2) If the amount of assistance excluded under paragraph (b)(9)(i) of this section is less than the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section, the amount of assistance described in paragraph (b)(9)(ii) of this section that is considered student financial assistance excluded under this paragraph is the lower of:

(i) the total amount of student financial assistance received under this paragraph (b)(9)(ii) of this section, or

(ii) the amount by which the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section exceeds the assistance excluded under paragraph (b)(9)(i) of this section.

(10) Income and distributions from any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under section 529 of such Code; and income earned by government contributions to, and distributions from, "baby bond" accounts created, authorized, or funded by Federal, State, or local government.

(11) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

(12)(i) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

(ii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (e.g., special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program;

(iii) Amounts received under a resident service stipend not to exceed \$200 per month. A resident service stipend is a modest amount received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development.

(iv) Incremental earnings and benefits resulting to any family member from participation in training programs funded by HUD or in qualifying Federal, State, Tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program unless those amounts are excluded under paragraph (b)(9)(i) of this section.

- (13) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
- (14) Earned income of dependent full-time students in excess of the amount of the deduction for a dependent in § 5.611.
- (15) Adoption assistance payments for a child in excess of the amount of the deduction for a dependent in § 5.611.
- (16) Deferred periodic amounts from Supplemental Security Income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts.
- (17) Payments related to aid and attendance under 38 U.S.C. 1521 to veterans in need of regular aid and attendance.
- (18) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit.
- (19) Payments made by or authorized by a State Medicaid agency (including through a managed care entity) or other State or Federal agency to a family to enable a family member who has a disability to reside in the family's assisted unit. Authorized payments may include payments to a member of the assisted family through the State Medicaid agency (including through a managed care entity) or other State or Federal agency for caregiving services the family member provides to enable a family member who has a disability to reside in the family's assisted unit.
- (20) Loan proceeds (the net amount disbursed by a lender to or on behalf of a borrower, under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family from a private loan to enable attendance at an educational institution or to finance the purchase of a car).
- (21) Payments received by Tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code or other Federal law.
- (22) Amounts that HUD is required by Federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in paragraph (b) of this section apply. HUD will publish a notice in the Federal Register to identify the benefits that qualify for this exclusion. Updates will be published when necessary.
- (23) Replacement housing “gap” payments made in accordance with 49 CFR part 24 that offset increased out of pocket costs of displaced persons that move from one federally subsidized housing unit to another Federally subsidized housing unit. Such replacement housing “gap” payments are not excluded from annual income if the increased cost of rent and utilities is subsequently reduced or eliminated, and the displaced person retains or continues to receive the replacement housing “gap” payments.
- (24) Nonrecurring income, which is income that will not be repeated in the coming year based on information provided by the family. Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income under this paragraph, even if the source, date, or amount of the income varies. Nonrecurring income includes:
- (i) Payments from the U.S. Census Bureau for employment (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not culminating in permanent employment.
 - (ii) Direct Federal or State payments intended for economic stimulus or recovery.
 - (iii) Amounts directly received by the family as a result of State refundable tax credits or State tax refunds at the time they are received.
 - (iv) Amounts directly received by the family as a result of Federal refundable tax credits and Federal tax refunds at the time they are received.
 - (v) Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding gifts, baby showers, anniversaries).

(vi) Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization.

(vii) Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings.

(25) Civil rights settlements or judgments, including settlements or judgments for back pay.

(26) Income received from any account under a retirement plan recognized as such by the Internal Revenue Service, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals; except that any distribution of periodic payments from such accounts shall be income at the time they are received by the family.

(27) Income earned on amounts placed in a family's Family Self Sufficiency Account.

(28) Gross income a family member receives through self-employment or operation of a business; except that the following shall be considered income to a family member:

(i) Net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations; and

(ii) Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.

(c) Calculation of Income. The PHA or owner must calculate family income as follows:

(1) Initial occupancy or assistance and interim reexaminations. The PHA or owner must estimate the income of the family for the upcoming 12-month period:

(i) To determine family income for initial occupancy or for the initial provision of housing assistance; or

(ii) To determine family income for an interim reexamination of family income under §§ 5.657(c), 960.257(b), or 982.516(c) of this title.

(2) Annual Reexaminations. (i) The PHA or owner must determine the income of the family for the previous 12-month period and use this amount as the family income for annual reexaminations, except where the PHA or owner uses a streamlined income determination under §§ 5.657(d), 960.257(c), or 982.516(b) of this title.

(ii) In determining the income of the family for the previous 12-month period, the PHA or owner must take into consideration any redetermination of income during the previous 12-month period resulting from an interim reexamination of family income under §§ 5.657(c), 960.257(b), or 982.516(c) of this title.

(iii) The PHA or owner must make adjustments to reflect current income if there was a change in income during the previous 12-month period that was not accounted for in a redetermination of income.

(3) Use of other programs' determination of income. (i) The PHA or owner may, using the verification methods in paragraph (c)(3)(ii) of this section, determine the family's income prior to the application of any deductions applied in accordance with § 5.611 based on income determinations made within the previous 12-month period for purposes of the following means-tested forms of Federal public assistance:

(A) The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).

(B) Medicaid (42 U.S.C. 1396 et seq.).

(C) The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).

(D) The Earned Income Tax Credit (26 U.S.C. 32).

(E) The Low-Income Housing Credit (26 U.S.C. 42).

(F) The Special Supplemental Nutrition Program for Woman, Infants, and Children (42 U.S.C. 1786).

(G) Supplemental Security Income (42 U.S.C. 1381 et seq.).

(H) Other programs administered by the Secretary.

(I) Other means-tested forms of Federal public assistance for which HUD has established a memorandum of understanding.

(J) Other Federal benefit determinations made in other forms of means-tested Federal public assistance that the Secretary determines to have comparable reliability and announces through the Federal Register.

(ii) If a PHA or owner intends to use the annual income determination made by an administrator for allowable forms of Federal means-tested public assistance under this paragraph (c)(3), the PHA or owner must obtain it using the appropriate third-party verification. If the appropriate third-party verification is unavailable, or if the family disputes the determination made for purposes of the other form of Federal means-tested public assistance, the PHA or owner must calculate annual income in accordance with 24 CFR part 5, subpart F. The verification must indicate the tenant's family size and composition and state the amount of the family's annual income. The verification must also meet all HUD requirements related to the length of time that is permitted before the third-party verification is considered out-of-date and is no longer an eligible source of income verification.

(4) De minimis errors. The PHA or owner will not be considered out of compliance with the requirements in this paragraph (c) solely due to de minimis errors in calculating family income. A de minimis error is an error where the PHA or owner determination of family income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (\$360 in annual adjusted income) per family.

(i) The PHA or owner must still take any corrective action necessary to credit or repay a family if the family has been overcharged for their rent or family share as a result of the de minimis error in the income determination, but families will not be required to repay the PHA or owner in instances where a PHA or owner has miscalculated income resulting in a family being undercharged for rent or family share.

(ii) HUD may revise the amount of de minimis error in this paragraph (c)(4) through a rulemaking published in the Federal Register for public comment.

Housing Choice Voucher (Section 8) Administrative Plan
Greater Gadsden Housing Authority (GGHA)
This Addendum is being Executed in Accordance Notice PIH 2024-38
Effective July 1, 2025

The following provisions are being added to the GGHA Administrative Plan dated May 28, 2019, via this addendum to comply with Notice PIH 24-38 and be effective July 1, 2025. These provisions are included in the ACOP approved by the Board on June 30, 2024, which cannot be implemented until HUD completes updates to its computer system. HUD has determined that the implementation of the changes included below are not subject to HUD system updates.

Income Exclusions – The list of income exclusions in the definition section of the ACOP is deleted and new list (see attachment 1) replaces it.

- See attachment Number 1 to this addendum

Definitions – The following definitions are added/changed:

- **Earned Income** - Income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Earned income does not include any pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare, social security, and governmental subsidies for certain benefits), or any cash or in-kind benefits.
- **Unearned income** - Any annual income, as calculated under § 5.609, that is not earned income (see earned income definition above).
- **Family** – Includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:
 - A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person:
 - An otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older:
 - A group of persons residing together, and such group includes, but is not limited to:
 - A family with or without children (a child who is temporarily away for the home because of placement in foster care is considered a member of the family)
 - An elderly family
 - A near-elderly family
 - A displaced family
 - The remaining member of a tenant family
 - A foster care arrangement, or a kinship care arrangement

Note: By definition, a family must contain a competent adult of at least 18 years of age to enter into a contract and capable of functioning as the head of the household.

- Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR § 5 and 960]
- Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not family members and have no rights of tenancy or continued occupancy.
- Foster Care Arrangements include situations in which the family is caring for a foster

adult, child, or children in their home who have been placed there by a public child placement agency, or a foster adult or adults placed in the home by a public adult placement agency. For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity to execute a lease.

- **Day Laborer** - An individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future.
- **Dependent** - A member of the family (which excludes foster children and foster adults) other than the family head or spouse who is under 18 years of age, or is a person with a disability, or is a full-time student. [24 CFR 5.603] An unborn child shall not be considered a dependent.
- **Foster Child** - a member of the household who meets the definition of a foster child under state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.
- **Foster Adult** - A member of the household who is 18 years of age or older and meets the definition of a foster child under State law. In general, a foster adult is unable to live independently due to a debilitating physical or mental condition and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.
- **Health and medical care expenses** - Any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.
- **Minor** - A member of the family, other than the head of family or spouse, who is under 18 years of age.

De Minimis errors - PHAs will not be considered out of compliance solely due to de minimis errors in calculating family income. De minimis errors occur when a PHA's determination of a family's income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (or \$360 in annual adjusted income).

If an error occurred in the calculation of income that results in the family overpaying rent, the amount of overpayment retroactive until the effect date of the error will be credited to the tenant account. The family may request a refund of the credit amount that exceeds charges due in the next 30 days or the credit will be applied to future charges.

Enterprise Income Verification (EIV) – EIV is no longer required to be used during interim reexaminations but at the HA's discretion may be used when other sources are unavailable or disputed.

Federal Privacy Act Statement (Form HUD 9886-A) – The HA is using the new Federal Privacy Act Statement, which includes the changes below:

- The executed consent form will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to the PHA to revoke consent.
- Families have the right to revoke consent by notice to the PHA; however, revoking consent will result in termination or denial of assistance.

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.

Plan Element B.3 Progress Report on Goals and Objectives

Update on Goal I. - Public Housing Operations: Exceeding this goal with a PHAS score of 88 for the Fiscal Year Ending June 30, 2024, (2025 score has not been released but projected to be 90). The HA does not anticipate any problems in maintaining a PHAS average score of 82 for the period beginning July 1, 2025, through June 30, 2030.

Update on Goal II. – Management of Section 8 Housing Choice Voucher Program: Exceeding this goal with a SEMAP score of 85 for the Fiscal Year Ending June 30, 2025. The HA does not anticipate any problems in maintaining a SEMAP average score of 82 for the period beginning July 1, 2025, through June 30, 2030.

Update on Goal III: Demolish or dispose of obsolete public housing as appropriate. The following is the history of Demolition/Disposition for the HA: 1) On May 24, 2000, Assistant Secretary, Harold Lucas notified Mr. Mack Heaton, Office of Public Housing, Birmingham HUD Office, that the HA application to demolish 40 units in 10 buildings was approved for Gateway Village AL049004 (formerly known as Myrtlewood Homes). The units were removed from inventory on May 24, 2000, and demolition completed on June 19, 2003. 2) On April 5, 2007, Ainars Roden, P.E. Director of the Special Application Center of HUD notified the HA that they approved the disposition of 0.75 acre of vacant land at Starnes Park AL049006 for the Fair Market Value of \$10,000, via a negotiated sale to the Boys and Girls Club of Northeast Alabama. The closing was held on November 6, 2007. 3) On September 9, 2011, Ainars Roden, P.E. Director of the Special Application Center of HUD notified the HA that they approved the HA application to demolish 30 units in 5 buildings at Northside Homes AL049008. The units were removed from inventory on March 12, 2012, and demolition completed on June 18, 2012. The Public Housing inventory and property continue to be evaluated each year to see if any future plans need to be made regarding possible demolition and/or disposition.

Update on Goal IV. - Comply with Lead Base Paint requirements and report to HUD annually. There were no activities involving LBP for this five-year period. The HA has disclosed the presence of known (all has been abated) lead-based paint and lead-based paint risks in the dwelling and has provided a pamphlet issued by the government on lead poisoning prevention. The HA has made available to all residents, access to written files containing notice of risk assessments, paint inspections, and/or hazard reduction activities relating to lead paint in their apartment. GGHA has removed all LBP, and no future LBP activities are anticipated.

Update on Goal V (A thru C): Increase assisted housing choices for individuals and families issued a Section 8 Housing Choice Voucher: See update on Goal V A, B and C below:

Update on Goal V-A: Provide voucher mobility counseling: As described in Section XIV, of the Section 8 Administrative Plan. Each person that receives a voucher is counseled when the voucher is issued on how Section 8 vouchers are mobile and that they have several options on

where they chose to lease a unit. Each person that is issued a voucher goes through the re-certification process and at that time they are counseled concerning the mobility/portability of a voucher. All requests for portability during the first year of this five-year period have been processed and approved. GGHA also provides a map of the local area to identify non-impacted areas and encourages voucher holders to consider renting in these areas.

Update on Goal V-B: Conduct outreach efforts to potential Section 8 landlords and add 15 new landlords from 7/1/25 thru 6/30/30: For the Fiscal Year beginning July 1, 2025, through February 5, 2026, the HA has already added 7 new landlords.

Update on Goal V-C: Comply with deconcentration Rule for Section 8: 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 as of the end of each Fiscal Year of the HA. New admissions with income at or below the extremely low-income limit are currently 100.00% for the first year of the Five-Year Plan.

Update on Goal V-D: The HA will continue to look for opportunities to use Project-Based Vouchers to increase housing opportunities for voucher holders but under the current financial constraints it is very unlikely.

Update on Goal VI: Provide an improved living environment Objectives: (see goals VI-A & VI-B below)

Update on Goal VI-A: Implement measures to ensure that 40% of all new admissions have income at or below the area median income for each development. As of 1/31/26 the first-year admissions have exceeded the goal with all new admissions at or below 40% of median income as follows: Colley Homes 80.95%; Carver Village 86.67%; Emma Sansom Homes 82.61%; Gateway Village 81.82%; Campbell Court 75.00%; and Starnes Park 55.56%.

Update on Goal VI-B: Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments maintain an income range of 85% to 115% of average income in covered developments in compliance with the deconcentration rule. **For the first seven months of the five-year period all developments were within the 85% - 115% income range**

Update on goal VI-C: Use a force Account Labor Team to modernize Public Housing units as outlined in the HA's Capital Fund Five-Year Action Plan and Annual Statement. To date 16 have been completed with another 8 anticipated prior to 6/30/2026 for a total of 24 units. The goal for this 5-year period is 140 units and we are slightly behind due to some slab issues but should still meet the 5-year goal. The HA will continue taking units offline as needed to complete the renovations in accordance with Federal Relocation Requirements.

Update on Goal VII: Implement a comprehensive security plan for public housing security and safety:

The HA plans to continue its contract with the City of Gadsden for additional police coverage because it is necessary for the safety and well-being of the residents, their guests and HA staff. The current contract with the City of Gadsden ends September 30, 2026, and is renewed annually. Also, the HA complies with the dwelling lease and ACOP in taking appropriate actions in screening applicants and evicting residents that violate the HA policies of the HA. This program has helped change Gadsden's public housing from "Housing of Last Resort" to "Housing of Choice" and all parties involved in the annual and five-year planning process are committed to keeping the extra police present in Gadsden Public Housing Therefore, this goal is being accomplished.

Update on Goal VIII: The HA is meeting its requirements as outlined below: Units in Campbell court and Starnes Park have been designated for resident groups that are elderly and/or disabled. In addition to the 57 ADA units and 26 units equipped for the hearing and visually impaired, the HA has 112 units at Campbell Court and 82 units at Starnes Park that were approved by HUD for occupancy of the elderly and disabled in 1995 and continue to be reapproved bi-annually.

Update on Goal IX: The goal for June 30, 2026, is for 300 individuals to be employed and there was a total of 326 (313 public housing & 13 Section 8) as of February 5, 2026. This exceeds the goal for 6/30/26.

Update on Goal X-A: The HA promotes fair housing for all applicants and residents. This HA will not tolerate any type of discrimination because of a person's race, color, national origin, sex, perceived sexual orientation, gender identity, marital status, religion, familial status, and disability or any other protected category of individual covered by fair housing laws. The HA works with local leaders from the National Association for the Advancement of Colored People (NAACP) to promote economic opportunities and affirmative action for low and very-low-income families. To demonstrate the HA's commitment to equal opportunity and affirmative action, the HA historically leased a unit to the NAACP for their main office in Gadsden/Etowah County. The unit was removed from occupancy, with HUD approval, and the NAACP was not charged rent because the programs they provide directly benefit public housing residents. The NAACP currently uses the community center for any needed meeting or events to provide a variety of services to residents since the most NAACP meeting are now virtual, there was a need for the unit for housing and the NAACP continues to provides a variety of services to the residents. Additionally, the SCLC leases a unit in Emma Sansom Homes under the same criteria with HUD approval and provides the following services for Public Housing Residents: Operate a Self-Esteem Enrichment Program for youth ages 9-18; Parenting Classes; Educational and Training Programs Youth and Adults; Voter Registration and Job Fairs.

Update on Goal X-B: The HA will follow its admissions policies to ensure that all applicants are housed on a non-discriminatory basis in the public housing developments administered by the HA. One hundred percent of the Public Housing units administered by the HA meets and/or exceeds the NSPIRE standards established by HUD. Also, all Section 8 units approved by the HA are inspected and must meet Housing Quality Standards and these units are livable and suitable for all individuals. The HA continues to undertake affirmative measures, as outlined above, to provide a suitable living environment for families living in assisted housing, regardless of race, color, national origin, sex, perceived sexual orientation, gender identity, marital status, religion, familial status, disability or any other protected category of individual covered by fair housing laws. Also, as specified by 24 CFR 903.7 (b) (2) (v) (B) of the Federal Regulations, the HA is required to use independent testers to assure that the site-based waiting list is not being implemented in a discriminatory manner and that no patterns or practices of discrimination exist. Since this requirement was published in the 24 CFR 903.7(b) (2) (v) (B), this HA has contracted with Independent Auditor's every third year to audit the site-based waiting list and each Independent Auditor has reported that it was their opinion the site-based waiting list is not being implemented in a discriminatory manner and no patterns or practices of discrimination exist. The latest Independent Audit Report was conducted by Moody & Company and this report indicated that in their opinion that the site-based waiting list is not being implemented in a discriminatory manner and no patterns or practices of discrimination exist, as of June 30, 2024. The next audit of the site-based waiting list will be conducted following the Fiscal Year End for June 30, 2027.