

Annual PHA Plan <i>(Standard PHAs and Troubled 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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, 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> PHA Name: Greater Gadsden Housing Authority _____ PHA Code: <u>AL049</u> _____ PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>7/1/2023</u> _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>974</u> _____ Number of Housing Choice Vouchers (HCVs) <u>194</u> _____ Total Combined Units/Vouchers <u>1168</u> _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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. 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> 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. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse;"> <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: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">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. Plan Elements

B.1 Revision of Existing PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

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):

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

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 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

	<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.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input 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"/> Designated Housing for Elderly and/or Disabled Families.</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 type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</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>Mixed Finance Development; Demo/Dispo; RAD – 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>Project-Based Vouchers – 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>Occupancy by Police Officers – GGHA was approved for a police officer to live in Emma Sansom Homes in 2021 but the officer fell through. If we have another officer express interest, we will re-request the use of a unit.</p> <p>Other: GGHA may apply for tenant protection vouchers under the foster youth to independence initiative (FYI) if the local DHR Office determines there is a need for such vouchers and requests GGHA seek funding.</p> <p>Vacancies for Modernization – Ongoing modernization of Colley Homes (AL049-1) continues to require units be vacant for the work and as units are completed, other units are placed in Mod status. The number of units fluctuates between 16 and 24.</p> <p>Other Capital Grant Programs 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.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>To help ensure that the HA meets its mission, ten (10) goals have been established as outlined in Section B.2 of the 5-Year Plan. Goals are established for a 5-year period and monitored each Fiscal Year End. The current cycle for the 5-year period goals ends on June 30, 2024. As of this date, the HA is meeting and/or exceeding all 10 goals outlined in the Five-year plan</p>
<p>B.4</p>	<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.</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>

<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</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>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</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.</p>
<p>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>C.3</p>	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>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.</p>
<p>C.4</p>	<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.</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>C.5</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>	
<p>D.1</p>	<p>Affirmatively Furthering Fair Housing (AFFH).</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 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.</p>

	<p>Fair Housing Goal: <u>Describe fair housing strategies and actions to achieve the goal</u></p>
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**Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled 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. All PHAs must complete this section.

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.” (24 CFR §903.7)

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) is noted since the HA cannot make this assessment.

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

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

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

Housing Needs of Families on the HA's Waiting List is as follows:									
Listed below are the totals for the Public Housing and Section 8 Waiting list Combined (As of 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. 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\(b\)](#)) 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 maintain 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
1. Federal Grants (FY 2021 grants)		
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
3. Public Housing Dwelling Rental Income		
	\$2,308,800	Day to Day Operations
4. Other income (list below)		
	\$606,217	Day to Day Operations

Financial Resources: Planned Sources and Uses		
Sources	Planned Dollars	Planned Uses
Details of Other Income \$ 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		
5. Non-federal sources (list below)	\$0	
Landmark Interest	\$1,000	
Total resources	\$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 GGHA reinstates the deduction, any eligible applicant for housing within a development that has a vacancy percentage of 2 percent or more qualifies to receive the one-month TTP deduction. To be eligible for the TTP deduction the head of household and or any adult member listed on the dwelling lease must not have received this deduction at any time from the HA in the past. Also, the HA will determine when it is granting a one month or two-month TTP deduction. The determination was made at this time that a one-month TTP deduction is being

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

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

MONTH	Year		
Development Name	Units Available for Occupancy	Occupied Units	Vacancy Percentage
Colley Homes	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 1st working day of each month with actual vacancy data, which will indicate which development qualifies for the TTP deduction.

d. Ceiling rents

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

e. Rent re-determinations:

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

(2) Flat Rents

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

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

GGHA has adopted internal control policies and procedures for day-to-day-operations including the hiring of a certified pest control technician to prevent and eradicate pest infestation.

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

Public Housing

The HA has an established written grievance procedure that complies with 24 CFR Part 966, Subpart B for residents of public housing. Also, the HA has added to the federal requirements as follows: The HA has defined promptly to mean within five business days from the date of mailing (Reference Section II G of the Grievance Procedure, which is filed and are available for review as backup for the Annual and Five-Year Plan at the main office of the HA at 422 Chestnut Street, Gadsden, AL

Applicants for public housing are entitled to an informal hearing and the initial contact is the Occupancy Specialist for initiating the grievance process. The Occupancy Specialist is located in the main administrative office of the HA, which is 422 Chestnut Street, Gadsden, Alabama. Existing Residents contact the Housing Manager within each development for initiating the grievance process.

Section 8 Tenant-Based Assistance

The HA has established an informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982. Also, the HA has added to the federal requirements as follows: The HA specified the number of days an applicant has to request an Informal Review and the number of days a participant has to request an Informal Hearing (Reference Section 8 -Applicant Denied Assistance and Provided Opportunity for Informal Review and Section 8 - Participant provided Opportunity for Informal Hearing). The Section 8 Coordinator is the initial contact for all Section 8 applicants and participants for initiating the grievance process.

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#)) **None of the programs listed above are administered by the PHA**

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of ([24 CFR §903.7\(l\)](#)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. ([24 CFR §903.7\(l\)](#))

The requirements for complying are including in the dwelling lease and the Admissions and Continued Occupancy Policy (ACOP). Also, the HA has a Community Service and Self Sufficiency Policy that is contain all the requirements for forms for Public Housing residents to execute for compliance with community service. Also, the HA carries out the following to enhance economic and social self-sufficiency for assisted families as follows:

A. HA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

The HA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937). The agreement was signed on July 31, 2001.

2. The HA also coordinates with the TANF Agency on:

- Client referrals;
- Information sharing regarding mutual clients; and,
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families

Also, the Executive Directors have served on the Jobs Task Force with the Department of Human Resources since 1992 and he is the current President of the Jobs Task Force and actively participates in welfare to work programs with DHR staff and Jobs Task Force members.

B. Services and programs offered to residents and participants
1. Self-Sufficiency Policies

The HA strives to enhance the economic and social self-sufficiency of assisted families by adopting policies that promote economic and social self-sufficiency. The policies are as follows:

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies

2. Economic and Social self-sufficiency programs

The HA coordinates, promotes and provides programs to enhance the economic and social self-sufficiency of residents as follows:

- Reach-Out -Youth Program – Provided by Quality of Life staff
- ESTEEM Program - Encouraging Children to Exhibit Excellent Minds. The program is in its 15th year. All Students with A & B reports cards are rewarded with activities and treats at the end of each 6 week period and Banquet and trip at the end of the school year. Trips have been made to Birmingham, Chattanooga, Atlanta and other area to attend attractions like the McWayne Center, Civil Rights Museum, Water Parks, Coke Museum, etc. The annual budget is approximately \$9,000 and individuals and local business make donations to support the ESTEEM program.

C. **Section 3 plan and goals.** The HA is committed to meeting Section 3 goals and has the reports ready to submit to HUD for fiscal year end June 30, 2022 when HUD makes the platform available. Also, the HA does not have a FSS program.

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) 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.

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. ([24 CFR §903.7\(q\)](#))

The HA has implemented project-based accounting and was fully operational for the period ending June 30, 2008. The HA submitted its plan and rationale for the assignment of the Asset Management (AMP) identification numbers to Mr. Ed Sprayberry on April 18, 2006, for asset management. The HA originally decided to leave all developments as originally assigned by HUD and not group any developments. Effective 7/1/2018 Northside (12 units, AL49-8) was combined with Colley Homes (AL49-1). All employees, except the Executive Director, keep their time based on which community they are doing work and the expense charged to that particular development. The Executive Director charges the Central Office. The HA has implemented development-based or project based accounting for each of its six developments, the Central Management Office and the Central Maintenance Office. The HA was fully operational with development-based or project based accounting for all developments, central management and central maintenance effective July 1, 2007. Also, Mr. Gregory A. Byrne, Director, Financial Management Division, has informed the HA, via e-mail on July 12, 2006, as required under Pm Notice 2006-10, that the Identification of Projects for Asset Management for the Greater Gadsden Housing Authority was assigned new Asset Management Property (AMP) Grouping numbers. The correspondence also indicated that the, "new project identification are deemed to be reasonable and were approved."

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. ([24 CFR §903.7\(r\)\(2\)\(i\)](#))

Substantial Deviation is defined in the HA's 5-Year Plan form HUD-50075-5Y as,

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

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. 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.

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 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 or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: **None planned in the current year**https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including 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: **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**

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

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. ([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.**

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. ([24 CFR §903.7\(i\)\(C\)](#))

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 1/20/22) 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.

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))

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 Rental 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.](#)
Not Applicable – None required

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.503) (24 CFR 903.7(b)) **NA**

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.505) (24 CFR 903.7(b)) **See Section B.2 above**

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03.](#) (24 CFR §903.7(e)) **No changes in Policies**

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

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). **See Section B.2 above**

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

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 3.B 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.
- C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

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 7.52 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.

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