

Housing Authority of the Birmingham District
(HABD)



**PHA 2025
ANNUAL
PLAN
DRAFT**

Executive Summary

The Housing Authority of the Birmingham District (HABD) was incorporated in 1935 to address the housing needs of low-income families in Birmingham. Since that time, HABD has grown to be the largest housing authority in Alabama and the 17th largest in the country under the public housing program. Currently, HABD has over 4000 units of public housing and over 6000 housing choice vouchers. Attached is HABD's Annual Plan for the 2025 Fiscal Year (July 1, 2024 – June 30 2025). The following plan elements were revised by HABD:

- 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
- Homeownership Programs
- Community Service and Self-Sufficiency Programs
- Asset Management REVISION PENDING
- Substantial Deviation
- Significant Amendment/Modification

In addition, HABD has new activities planning, which include the following plan elements:

- Hope VI or Choice Neighborhoods
- Demolition and/or Disposition
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD
- Project-Based Vouchers
- Units with Approved Vacancies for Modernization
- Other Capital Grant Programs

Since its inception, HABD has led the development of affordable housing for low-income families in the City of Birmingham. During this plan year, HABD will continue to execute programs in accordance with the 5-Year Plan and this document to better serve current residents, participants, applicants, and the greater community. HABD is designated a Standard PHA and thus submits the HUD-50075-ST.

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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: <u>Housing Authority of the Birmingham District</u> PHA Code: <u>AL001</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>4090</u> Number of Housing Choice Vouchers (HCVs) <u>6155</u> Total Combined Units/Vouchers <u>10245</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><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; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <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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		PH	HCV																														
Lead PHA:																																	

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. <input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures. <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs. <input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management. <input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<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> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <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>(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>
B.3	<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>

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. The 5-year action plan was approved by HUD on August 3, 2020.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe: Please See Attachment.
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 <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
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 N <input type="checkbox"/> <input checked="" type="checkbox"/> 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 N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> Type text here (b) If yes, please describe:

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Goal: Ensure equal opportunity and affirmatively further fair housing</p> <p>Strategy 1 HABD will, on an ongoing basis, review fair housing policies and procedures with resident/participant and outside stakeholder groups. HABD will create a Fair Housing Advocacy Committee comprised of a diverse group of clients served by HABD and community partners to advise HABD on the needs of residents, participants, applicants, and the larger Birmingham community.</p>
<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Strategy 2 HABD will form a working group of staff from across the Agency to become subject matter experts through ongoing training and collaborative efforts to ensure the Agency advances the principles of fair housing throughout its practices.</p> <p>Strategy 3 HABD will implement modernization and development activities in a manner that meets or exceeds current ADA and accessibility requirements.</p>
<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Strategy 4 Through annual training and ongoing campaigns, HABD will ensure that staff are knowledgeable of laws and regulations concerning fair housing, and are equipped to effectively implement HABD policy and procedure.</p> <p>Strategy 5 HABD will utilize all communication means (such as website, social media, print media, etc.) to inform residents, participants, applicants, landlords, and other partners of fair housing rights and responsibilities.</p>

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))

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))

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))

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))

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))

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))

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))

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))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

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))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

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.

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:

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:

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))

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))

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.](#)

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))

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))

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\(e\)\)](#)

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\(b\)](#)).

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\(a\)\(1\)](#).

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

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\(r\)\(1\)](#))

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."

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\(p\)](#))

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](#))

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.

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.

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



Section B.1 contains any revisions made to the elements of the PHA Plan which are listed below. A check denotes that the PHA Plan element has been revised and a summary of each revision is attached to this section.

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. ✓

Attachment A

Revised Statement of Housing Needs and Strategy for Addressing Housing Needs



B.1. Revision of PHA Plan Elements

ATTACHMENT A: STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS

According to the 2022 US Census 2018-2022, Birmingham's median household income is \$42,464. In 2019, 44% of Birmingham renters used at least 35% of their income for housing costs; that figure is now above 50%. This trend is unfortunately unsurprising, illustrating the sustained and growing need for affordable housing in Birmingham.

HUD's 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data show Birmingham has almost 23,810 extremely low-income families, and nearly three quarters of those are renters. According to the City of Birmingham's Consolidated Plan, about 40% of single-person renter households are individuals over the age of 65 with a fixed income. ACS data for 2022 (Disability Characteristics, S1810) show 16.9% of Birmingham's citizens have a disability including more than 83,365 people with ambulatory difficulties (defined as having serious difficulty walking or climbing stairs) and 54,141 people with independent living difficulties (defined as having difficulty doing errands alone such as visiting a doctor's office or shopping because of a physical, mental, or emotional problem).

ACS Data for 2022 Disability Characteristics S1810	Persons with a disability	Percent of population
Disabled individuals in Birmingham-Hoover	163,684	14.9%
DISABILITY TYPE		
With a hearing difficulty	43,982	4.0%
With a vision difficulty	31,707	2.9%
With a cognitive difficulty	63,143	6.1%
With an ambulatory difficulty	83,635	8.1%
With a self-care difficulty	31,596	3.0%
With an independent living difficulty	54,141	6.4%

Individuals served by HABD have similar rates of disability to the Birmingham community. In public housing, 14% of individuals are disabled. However most elderly heads and co-heads of household are disabled, 54% in public housing households.

	Average household size	Total people in households served	Percent with disability, among Head, Spouse, Co-head, aged 61 years or less	Percent with disability, among Head, Spouse, Co-head, aged 62 years or older	Percent with disability, among all persons in households
Public Housing	2.3	7270	49	51	11
Housing Choice Voucher	2.6	13902	25	79	16

The City of Birmingham has identified “Housing cost burden greater than 50 percent” as the most critical problem that low and extremely low-income households face and renters are particularly at risk for these burdens. Complicating the cost of housing is the state of the housing stock in Birmingham which is aging, in need of repair and modernization to avoid falling into unlivable conditions and rendering the occupants at risk of homelessness.

This brief review of housing need data shows the continued need not only for rental assistance programs such as the Housing Choice Voucher program to help families afford to rent homes, but also for hard units, such as the public housing program and other units managed by the Agency. HABD’s housing stock is aged similar to the city’s stock and our repositioning strategy has the following goals:

- a. Enhancing the quality of affordable units and the neighborhoods in which they are located
- b. Maintaining or increasing the number of units available
- c. Increasing the number of affordable housing outside of racially/ethnically-concentrated areas of poverty (R/ECAPs)
- d. Ensuring the accessibility of units matches the needs of current residents and residents of the jurisdiction

HABD has set an ambitious goal to maintain the same number of units through the repositioning, and indeed will seek ways to increase the number of units available. Similarly, we will pursue all available opportunities to increase rental assistance through a variety of partnerships such as the HUD-VASH program and others.

Our ability to serve families on our waiting list is greatly impacted by management practices, and where possible, streamlining, new technologies and other strategies will be implemented to maximize the number of families the Agency serves.

Attachment B
Revised Deconcentration and Other
Policies that Govern Eligibility, Selection,
and Admissions



REVISION PENDING - ATTACHMENT B: DECONCENTRATION and OTHER POLICIES that GOVERN ELIGIBILITY, SELECTION, and ADMISSIONS

Deconcentration Rule (Housing Operations) PENDING REVISION

The objective of the deconcentration rule for public housing units is to require 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 HABD ACOP outlines specific objective of HABD 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. HABD will take action to require that no individual development has a concentration of higher income families in one or more of the developments. To assure that HABD does not concentrate families with higher income levels, it is the goal of HABD not to house more than 60% of its units in any one development with families whose income exceeds 30% of the area median income. HABD will track the status of family income, by development, on a monthly basis.

The average annual income of HABD Public Housing Communities is as follows:

Elyton Village: \$12,973 (AL001000001)	Rev. Dr. Morell Todd Homes: (AL001000011) \$10,569	Ralph Kimbrough Homes: (AL001000018) \$14,413
Southtown Court: \$13,309 (AL001000004)	Collegeville Center: (AL001000013) \$11,821	Benjamin Greene Village: (AL001000023) \$14,781
Charles P. Marks Village: (AL001000006) \$10,678	Russell B. Harris Homes: (AL001000014) \$16,790	
Smithfield Court: \$10,806 (AL001000009)	North Birmingham Homes: (AL001000016) \$12,627	
Tom Brown Village: (AL001000010) \$13,972	Cooper Green Homes: (AL001000017) \$17,051	

The current (2022) HUD-published Median Income for the Birmingham-Hoover metropolitan area is \$84,800.00. Based on this amount, 30% of the area Median Income is \$25,440.00. HABD currently has no site with average income at or above 30% of the median income.

Economic and Social Deconcentration: Selection will be made in such a manner to avoid concentrations of the most economically and socially deprived families in one or all of the housing communities operated by the HABD and to maintain a resident population in each housing community composed of families with a broad range of income and rent paying ability that is generally representative of the range of low-income families in the HABD's area of operation as defined by state law.

Deconcentration and Income Mixing: The Housing Authority of the Birmingham District has the following plans and/or policies that impact deconcentration and income mixing:

- **Flat Rents:** The HABD is required to establish flat rents, per bedroom size, based on 80% of the fair market rent (FMR) of Birmingham-Hoover Metropolitan Statistical Area. The agency began applying the flat rent policy in October 2014. Since that time

all qualifying new applicants pay the new flat rent effective at move in. Households on flat rent prior to enactment of the new 80% FMR rule have been subject to a 35% annual increase in flat rent at the time of yearly re-certification up to the 80% FMR amount

- **Homeownership Program:** The HABD has an active homeownership program to identify and assist families that may qualify for homeownership opportunities. The attraction of higher income working families to public housing will enable the HABD to develop a larger pool of qualified families. The minimum yearly income required for participation in the program is \$15,000.00.
- **Improvements and Upgrades:** The HABD is dedicated to improving living conditions at all sites through various forms of upgrades and redevelopment in order to make its housing portfolio more competitive with private sector housing. An ongoing lighting plan in conjunction with Alabama Power has brought about replacement of all exterior lighting. Old lighting has been upgraded to brighter and more energy efficient LED lighting. Redevelopment of Loveman Village through HUD's Rental Assistance Demonstration (RAD) program will provide opportunities to attract more working families attracted to new construction in both traditional and new neighborhoods. Further redevelopment and upgrades to Southtown, Marks Village, Freedom Manor, and other sites are also planned.
- **Working Family Preference:** HABD is instituting a working family preference for select sites in order to attract working families public housing communities, thus assisting further with deconcentration efforts.

Other Policies that Govern Eligibility, Selection, and Admissions (Public Housing)

How to Apply:

Families wishing to apply for public housing shall complete an application for public housing assistance. Applications may be made in person or online. Completed applications will be accepted for all applicants and the information will be verified by the HABD. Submitted applications are dated and time-stamped to ensure proper waiting list placement. Reasonable accommodations are available to any qualified individual to assist in the application process. In FY 2024 HABD plans to relocate its Public Housing Intake Department from the McCoy Building to Elyton Village.

Interviews and Verification Process:

Applicants are given the opportunity to complete their applicant file via an interview once they approach a selection position from the waiting list. Failure to attend an interview will subject an applicant to the withdrawal of their application.

Closing of Application Taking

HABD may close the taking of applications if the site waiting list is such that additional applicants would not be able to occupy a public housing unit within the next twelve (12) month

period. Application taking may be suspended by bedroom size, if applicable. Currently, HABD IS NOT accepting applications for one (1) and two (2) bedroom units and these waiting lists are CLOSED until further notice.

Opening of Application Taking

When HABD begins taking applications, the waiting list may be opened by bedroom size. HABD will make known to the public through publication in a newspaper of general circulation, minority media, and other suitable means the availability and nature of housing assistance for eligible families.

Admission Eligibility

HABD is responsible for screening family behavior and suitability for tenancy. All families who are admitted to HABD's public housing program must be determined eligible according to HUD requirements and HABD requirements which are contained in the Agency's Admissions and Continued Occupancy Policy (ACOP). The following subject matters were updated in the Administrative Plan:

Section IV: Definition of Terms

Veteran/Veteran Family: Person that is currently serving or has served in any branch of the United States military, including the National Guard or Reservist, spouses, or their surviving spouse.

Surviving Spouse: a person who had a valid marriage to a veteran and who was the spouse of the veteran at the time of the veteran's death; lived with the veteran continuously from the date of marriage to the date of death, and/or, a veteran and/or spouse as defined by the U.S. Department of Veteran Affairs at

<https://www.va.gov/>

Section XIV: Orientation of Families and Issuance of Housing Voucher -Voucher Term

Voucher Term: The term of the voucher is 90 days from the date of issuance. Prior to expiration, the family may contact the HA to inquire about assistance the HA can provide the family in locating suitable housing. The family must submit a Request Tenancy Approval within the 60-90 day period unless an extension has been granted by the HA. Once the family has submitted a Request for Tenancy Approval the clock is stopped and/or suspended on the term of the voucher (See "Suspension"). If the unit is not approved for any reason, the remaining days will be reinstated. If the initial term is not adequate for finding a unit to lease, the family may request an extension of the initial term as described below.

Requesting for Extensions of the Term

A family may request an extension of the Voucher time-period. All requests for extensions should be received prior to the expiration date of the Voucher. Extensions are permissible at the discretion of the HA primarily for the following reasons:

A. Extenuating circumstances such as hospitalization or a family emergency for an extended

period of time which has affected the family's ability to find a unit within the initial 60-90-day time period. The HA representative will verify the extenuating circumstances prior to granting an extension.

B. The family has evidence that they have made a consistent effort to locate a unit and request support services from the HA, throughout the initial 60- 90-day period with regard to their inability to locate a unit.

C. The family has turned in a Request for Lease Tenancy Approval prior to the expiration of the 60- 90-day time period, but the unit has not passed HQS.

PHA Error

If the HABD makes an error in the bedroom size designation, the family will be issued a Voucher of the appropriate size at the time the error is discovered. If the family decides to remain in the same unit, and it is not overcrowded, the payment standard will be corrected to the lower of the new voucher size, or the actual unit size effective on the reexamination date.

Exhibit A: Local Waiting List Preferences

Litigation Action (5) is defined as having been a person(s) who has undergone legal actions related to resolving a dispute through the judicial court system. or as part of a settlement agreement, a housing choice voucher was selected. The Housing Authority of the Birmingham District (HABD) will use the following local preferences and assigned points for all HABD Section 8 waiting lists, including tenant-based and project-based voucher; RAD and non-RAD properties:

*Please note, each site-based waiting list may include additional waiting list preferences. Please see each site listing for additional details and specific waiting list preferences included.

Exhibit H: Project-Based Waiting List -The Villas at Titusville

The Housing Authority of the Birmingham District (HABD) hereby establishes the Project-Based Voucher Program and waiting list for The Villas at Titusville. The establishment of this program is consistent with the Authority's Plan, Five-year Plan, and Strategic Plan.

The Villas at Titusville will have 5 the following local preferences:

- Working Family 7 points
- Elderly/Disabled 7 points
- Veterans 8 points
- Public Housing Demo/Dispo 5 points
- Public Housing Crime Victims 5 points
- Public Housing Uninhabitable 5 points

The Villas at Titusville will have 7 the following local preferences:

- Working Family 7 points
- Elderly/Disabled 7 points
- Veterans 8 points
- Public Housing Demo/Dispo 5 points
- Public Housing Crime Victims 5 points
- Public Housing Uninhabitable 5 points
- Litigation Action 5 points

Exhibit K: Choice Mobility for Rental Assistance Demonstration-Section 8 Project Based Rental Assistance (PBRA) Properties

Addendum to Section 8 Administrative Plan

The Section 8 Project Based Rental Assistance Program (PBRA) was authorized by Congress in 1974 to provide rental subsidies for eligible families residing in newly constructed, substantially rehabilitated, and existing rental and cooperative apartment projects. PBRA is one of the funding platforms that public housing units can be transitioned to under the Rental Assistance Demonstration (RAD) program.

Family Choice to Move with Continued Assistance/Choice Mobility

Under RAD PBRA, residents have the right to move with tenant-based assistance after the latter of 24 months from the date of execution of the HAP contract or 24 months after the move-in date. This policy outlines how HABD will implement the HUD requirements for RAD PBRA Choice Mobility.

HCV Inventory Program CAP

HUD affords PHAs the opportunity to limit (cap) the number of Choice Mobility moves under the PBRA Program. As such, HABD will limit its number of Choice Mobility moves to no more than one-third of its annual HCV turnover vouchers to residents of RAD PBRA properties. Once the maximum number of RAD PBRA Choice Mobility HCVs have been issued within any given year, additional requests will be placed on a waiting list. HABD will create and maintain a waiting list in the order in which the requests from eligible households were received.

Project Turnover Cap

HABD may negotiate the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the RAD PBRA property. (For example, if the project has 100 assisted units, the Project Owner (if not owned by HABD) and HABD could limit the number of families exercising Choice Mobility to 15 in any year, but not less than 15.) HABD will create and maintain a waiting list for requests that exceed the Project Turnover Cap.

Additional Program Requirement

Residents wanting to transfer assistance from PBRA to HCV must comply with requested documentation requested by the Department. This includes verification of 24-month residency in a PBRA unit (in connection with the HABD), and any applicable household information.

A. Section XI: Selection and Participation Plan – Housing Voucher

Housing Voucher Selection and Participation Plan

B. Vouchers for Foster Youth to Independence Initiative (FYI)

C. Exhibit K: Foster Youth to Independence (FYI) Initiative

Vouchers provided by HUD for youth eligible under the Family Unification Program (FUP) is subject to availability.

Special Preference

The HABD hereby establishes a waiting list preference for the FYI Initiative,

whereas youth referred by the Alabama Department of Human Resources must be certified by said agency, has attained at least 18 years and not more than 24 years of age, 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 at age 16 or older, and is homeless or at risk of becoming homeless at age 16 or older.

At the time of application, initial determination of an applicant's entitlement to the HABD local preference for FYI as described above, may be made on the basis of the applicant receiving certification from the Alabama Department of Human Resources and must be verified upon selection from the waiting list. The preference points available for the FYI Initiative will be ten (10) points.

Funding

- a. HABD may request a minimum of one (1) voucher and a maximum of twenty-five (25) vouchers per federal fiscal year. Additional vouchers may be requested with 90 percent or greater utilization.

Youth Eligibility

- a. Is homeless or is at risk of becoming homeless at age 16 or older.

Additional Program Requirements

- a. **Turnover:** Vouchers awarded under this notice for eligible youth will continue to be used for other eligible youth upon turnover. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline. HUD will monitor the utilization of vouchers awarded through this notice on an annual basis and any unutilized voucher assistance that is no longer needed will be recaptured and reallocated as authorized under the 2020 Act.
- b. **Youth Failure to Use Voucher:** Should a youth fail to use the voucher, the PHA may issue the voucher to another eligible youth if one has been identified. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline.
- c. **Waiting List Administration:** Upon receipt of a referral(s) from the Alabama Department of Human Resources of an eligible youth, compare the name(s) with youth already on the PHA's HCV waiting list. Any youth on the PHA's HCV waiting list that matches with the Alabama Department of Human Resources' referral must be assisted in order of their position on the waiting list in accordance with PHA admission policies. Any youth certified by the Alabama Department of Human Resources as eligible and not on the HCV waiting list must be placed on

the waiting list (pending HCV eligibility determination). Due to the nature of FYI vouchers, the waiting list will always remain open for FYI referrals.

SECTION XIV: Orientation of Families and Issuance of Housing Voucher

Format of the Briefing

- a. **Briefing of Housing Voucher Holders:** The briefing may be done either in group or individual sessions, in person, or in a virtual setting.
- b. **Information Packet:** When a family is selected to participate in the program. HABD will provide the family a packet, in person, via mail, via electronic mail, or any other electronic means.

D. SECTION XLIII: Informal Review for Applicant; Informal Hearing for Participant

Informal Review for Applicant: The HABD must give an applicant an opportunity for an informal review of the HABD decision denying assistance to the applicant. The review procedures must comply with the following:

- a. The review may be conducted in person, over the phone, virtual platform, or any other platform that HABD deems necessary to conduct said reviews;

The hearing may be conducted in person, over the phone, virtual platform, or any other platform that HABD deems necessary to conduct said meeting.

- a. **Special Cooperation with States Attorneys and/or Law Enforcement Agencies to Relocate:** The Authority from time to time may cooperate with states attorneys and/or law enforcement agencies to relocate households eligible for rental assistance for protection of potential witnesses. Such action will be taken with administrative discretion and approval of the Authority's President/CEO or designee. An example of such action may but not necessarily be limited to, a household whose member (s) has extended them self in the public interest which placed them in personal jeopardy.
- b. **Special Transfers of Relocation by Authority/Victims of Crime in Public Housing:** The Authority from time to time may need to relocate or transfer a household to and from our Section 8 or Public Housing Programs for various reasons. Such action will be taken with administrative discretion and approval of the Authority's President/CEO or designee.

Organization of the Waiting List: The HABD waiting list must contain the following information for each applicant listed:

- a. Qualification for any local preference, if available;
- b. When a housing voucher is available, the HABD will select the applicant who according to date and time of the application, and as sorted by the computer, has the oldest application on the waiting list with a local housing preference, if available/applicable.

E. Removal of all local preferences for homeless, displaced, and working families and addition of three new preferences

F. Local Waiting List Preferences

HABD will use the following local preferences and assigned points:

- a. **Public Housing Demo/Dispo (5)**- is defined as person(s) legally occupying a unit in a specified public housing community, on the date the community was approved by HUD to be disposed or demolished.
- b. **Public Housing Crime Victims (5)**- is defined as having been a victim of a violent crime or a witness providing testimony to law enforcement of a violent crime which occurred in or around the public housing community.
- c. **Public Housing Uninhabitable (5)**- is defined as person(s) legally occupying a unit that is deemed unsafe or uninhabitable and there is no other appropriate unit available in the public housing community in which they reside.
- d. **Veteran/Veteran Family (8)**- is defined as person(s) [This preference is only for the Villas at Titusville.] that is currently serving or has served in any branch of the United States military, including the National Guard or Reservist, spouses, or their surviving spouse. Surviving Spouse: a person who had a valid marriage to a veteran and who was the spouse of the veteran at the time of the veteran's death; lived with the veteran continuously from the date of marriage to the date of death, and/or, a veteran and/or spouse as defined by the U.S. Department of Veteran Affairs at <https://www.va.gov/>
- e. **Litigation (5)**- is defined as having been a person(s) who has undergone legal actions related to resolving a dispute through the judicial court system, and as part of a settlement, an HCV was selected.

HABD will use the following local preferences for selected PBVs waiting lists managed by HABD:

Selection Criteria: The waiting list selection criteria is consistent with Exhibit D: Section 8 Project- Based Voucher Program, of this Administrative Plan.

Informal Review or Hearing: The informal review process is consistent with Section X: Grounds for Denial or Termination of Assistance, of the Administrative Plan, and with Federal Regulations: 24 CDR

982.554. The owners of the Villas at Titusville have identified specific income criteria, in which each family that is eligible for the property, must have income. No family will be referred to the owner unless they can meet this criterion. Any additional suitability criterion must be determined by the owner of the property.

F. Exhibit L: Emergency Housing Vouchers (EHV)

EHVs are tenant-based rental assistance under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)). EHVs are to assist individuals and families who are experiencing homelessness, at risk of experiencing homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

The operating requirements of the EHV program have been provided in PIH Notice 2021-15, which this plan incorporates by reference, including any subsequent requirements promulgated by HUD. The Assisted Housing Department will develop procedures in compliance with PIH Notice 2021-15 and any subsequent notices.

The following definitions apply to the EHV Program:

a. Homelessness

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals);
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that

institution.

2. An individual or family who will imminently lose their primary nighttime residence provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

b. At Risk of Homelessness

1. An individual or family who:

- i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition above; and

iii. Meets one of the following conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their 19 current housing or living situation will be terminated within 21 days of the date of application for assistance;
- Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and

Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

3. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 11434a (2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.
- c. Individuals or families who are fleeing or attempting to flee, domestic violence, sexual assault, stalking or human trafficking. Any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This includes cases where a HUD- assisted tenant reasonably believes that there is a threat of imminent harm from further violence if they remain within the same dwelling unit, or in the case of sexual assault, the HUD-assisted tenant reasonably believes there is a threat of imminent harm from further violence if they remain within the same

dwelling unit that they are currently occupying, or the sexual assault occurred on the premise during the 90- day period preceding the date of the request for transfer.

1. Domestic violence includes felony or misdemeanor crimes of violence committed by:
 - i. A current a current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship).
 - ii. A person with whom the victim shares a child in common,
 - iii. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
 - iv. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or
 - v. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
2. Dating violence means violence committed by a person:
 - i. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and

- ii. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship.
- 3. Sexual assault means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.
- 4. Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - i. Fear for the person's individual safety or the safety of others; or
 - ii. Suffer substantial emotional distress.
- 5. Human Trafficking (includes both sex and labor trafficking)
 - i. Sex trafficking-The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force,

fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age;

- ii. Labor trafficking- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- d. Individuals or families who are recently homeless; this category is composed of individuals and families determined by the Continuum of Care (CoC) or its designee to meet the following definition:
- 1. Recently Homeless- Individuals and families who have previously been classified by a member agency of the CoC as homeless but are not currently homeless as a result of homeless assistance (financial assistance or services), temporary rental assistance or some type of other assistance, and where the CoC or its designee determines that the loss of such assistance would result in a return to homelessness or the family having a high risk of housing instability. Examples of households that may be defined as recently homeless by the CoC include, but are not limited to, participants in rapid rehousing, and permanent supportive housing. Individuals and families classified as recently homeless must be referred by the CoC or its designee.

2. Funding- The American Rescue Plan Act of 2021 (ARP) provides funding for fees for the costs of administering the EHV's and other eligible expenses defined by notice to prevent, prepare for and respond to coronavirus to facilitate the leasing of the emergency housing vouchers. PHAs will be allocated a one-time service agree to support its efforts in implementing and operation of an effective EHV Program that will address the needs of EHV eligible individuals and families. The following are eligible activities in which the service gees may be used for:
 - i. Housing Search Assistance
 - ii. Security Deposit/Utility Deposit/Rental Application/Holding Fee Usage
 - Application fees/nonrefundable administrative or processing fees/refundable application deposit assistance
 - Holding Fees
 - Security Deposit Assistance
 - Utility Deposit Assistance/Utility Arrears
 - iii. Owner-related Uses
 - Owner recruitment and outreach
 - Owner incentive and/or retention payments
 - iv. Other Eligible Uses
 - Moving expenses (including move-in fees and deposits)
 - Tenant-readiness services
 - Essential household items
 - Renter's insurance if required by lease
 - HABD reserves the right to allocate usage of said fees for eligible activities, described above and in PIH Notice 2021-15 (HA,) based on the individual clients' needs.
3. Waiting List-The HABD will create a separate waiting list for the EHV program which will serve as the sole waiting list for the program's referrals from the CoC, victims' services providers, or other approved agencies in which the PHA may receive referrals from, as stated in PIH Notice 2021-15(HA).
4. Additional Program Requirements-Unlike regular HCV admissions, PHAs may not deny an EHV applicant admission regardless of whether:
 - i. Any member of the family has been evicted from federally assisted housing in the §A PHA has ever terminated assistance under the program for any member of the family.
 - ii. The family currently owes rent or other amounts to the PHA or to

another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

- iii. The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
- iv. The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA.
- v. The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with §982.553(a)(3).
- vi. The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

Additionally, prohibitions based on criminal activity for the eligible EHV populations regarding drug possession should be considered apart from criminal activity against persons (i.e., violent criminal activity).

The PHA must still deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information in accordance with 24 CFR part 5 as required by § 982.552(b)(3).

Voucher Search Time

The initial voucher search term for an EHV family must be at least 120 days. Any extensions, suspensions, and progress reports will remain under the current policies of the PHA and this Administrative Plan, but will apply after the minimum 120-day initial search term.

H XXIX-Changes in Subsidy Standards

- a. Determining Family Unit (Voucher) Size
 - 1. One bedroom will generally be assigned for each two family members, except in the following circumstances:
 - i. Persons of the opposite sex (other than head/co-head) will be allocated separate bedrooms
 - ii. Family members of different generations will be allocated separate bedrooms regardless of sex or age (ex. Grandmother; mother; daughter)
 - iii. Dependents of the same sex with an age differential of more than 10 years will be allocated separate bedrooms
 - iv. A pregnant individual with no other household members will be allocated a two bedroom

- v. HABD will consider alternative voucher sizes for household as a reasonable accommodation for medical purposes
- vi. Live-in attendants will be provided a separate bedroom. No additional bedrooms are provided for the attendant's family.

Voucher Size	Number of Persons	
	Minimum	Maximum
1 BR	1	2
2 BR	2	4
3 BR	3	6
4 BR	4	8
5 BR	5	10
6 BR	6	12

b. Exceptions to Subsidy Standards

The HABD shall grant exceptions from the subsidy standard if the family requests and the HABD determines, the exceptions are justified based on relationship, age, sex, health, handicap or disability of family members, or other individual circumstances.

1. Request for Separate Bedroom Due to Medical Reasons-The family must also provide written documentation justifying an additional bedroom at the time of each subsequent annual re-certification.
2. Changes for Applicants-If a family member identified in the full application will be temporarily absent for reasons not detailed in Section A. Determining Family Unit Size #5, the family voucher size will be issued without that member.

c. Unit Size Selected

The family may select a different size dwelling unit than that is listed on the voucher. The following criteria shall apply:

1. **Affordability Limitation:** If a family enters into a new lease agreement which requires the Housing Authority to execute a new HAP contract for a dwelling unit with a gross rent in excess of the payment standard as determined above, the total tenant payment cannot exceed 40% of the household's monthly adjusted income. HABD will not approve a lease for a unit that is not affordable pursuant to this 40% limitation.

Attachment C

Revised Financial Resources



Attachment C - Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2024 grants)		
a) Public Housing Operating Fund based 95% funding eligibility	30,500,000	
b) Public Housing Capital Fund	13,637,000	
c) CNI Grant People Project Portion of Budget	831,000	
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant Based Assistance	48,803,000	
f) Administrative Fund	4,852,000	
g) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
h) Resident Opportunity and Self-Sufficiency Grants - ROSS FSS	156,000 244,521	
i) Youth Build Grant based on two-year Grant period, only one year is reported	750,000	
j) HOME		
Other Federal Grants (list below)		

2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income	6,690,000	Operations
4. Other income (list below)		
Income on Investments	85,000	Operations
Sales and Services		Operations
Other Income	50,000	
Total resources	105,577,521	

Attachment D

Revised Rent Determination



ATTACHMENT D: RENT DETERMINATION

Statement on Flat Rents (Property Operations)

The flat rent amounts went into effect March 1, 2023.

HABD Flat Rent Schedule January 2023 Based on 80% of Area FMR

Bedroom Size	2022 - 2023 Fair Mkt Rent	HABD Flat Rent / 80% FMR
0	866.00	693.00
1	942.00	754.00
2	1,075.00	860.00
3	1,376.00	1,101.00
4	1,494.00	1,195.00
5	1,718.00	1,374.00
6	1,942.00	1,554.00

NOTE: Federal Mandated Changes to Flat Rent.

On January 17, 2014, the President signed the Department of Housing and Urban Development (HUD) Appropriations Act of 2014. Section 210 of that act amended the United States Housing Act of 1937 to create a new rule for flat rents for all Public Housing Agencies (PHAs). On March 20, 2014, HUD issued instructions to all PHAs informing them that they must implement the new rules for flat rents effective June 1, 2014. All PHAs must revise the flat rent schedule to be at least 80% of the Fair Market Rent for their area. HUD gave PHAs the discretion to apply the new flat rent schedule to a family’s next annual rent option or annual reexamination. Also, the statute limits annual flat rent increases to 35% of the existing flat rent amount. Therefore, these mandated increases will not go into effect until the next annual rent option or annual re- certification.

Rent Determination: (Section 8)

The following subject matter was updated in the Administrative Plan:

- Interim Change Policy Section XLV Reexamination of Income and Family Circumstances - Interim Redetermination of Rent

Addition of Defined Terms – The following term was added to the Administrative Plan

Fixed Income: Periodic payments at reasonably predictable levels from one or more of the following sources:

Social Security, Supplemental Security Income, Supplemental Disability Insurance

- Federal, state, local, or private pension plans
- Annuities or other retirement benefits programs, insurance policies, disability or death benefits, or other similar types of periodic receipts
- Any other source of income subject to adjustment by verifiable COLA or current rate of interest

Streamlined Income Determination for Fixed Income Sources 24 CFR 982.516(b)

PHAs are permitted to implement streamlined requirements for verifying and adjusting fixed income sources over a three-year cycle for families with an unadjusted income consisting of 90 percent or more from fixed income sources. HABD establishes the flexibility to implement the streamlined-income process for eligible households.

In the initial year (first year) of the three-year cycle, HABD will complete a full annual income determination, applicable with all HUD regulations, guidance, and HABD requirements. Year two and year three of the three-year cycle, HABD will obtain a certification from the family stating that their fixed income sources have not changed from the prior year and that their household income is still made of at least 90 percent from fixed sources. If the certification for years two and three are provided, HABD will adjust the fixed income sources based on the Cost-of-Living Adjustment (COLA) that is applicable to said income source. Non-fixed income from the previous year's calculation will be used.

When using the streamlined income determinations, the family's fixed income must be adjusted using a COLA or current interest rate that applies to each specific source of fixed income and is available from a public source or through tenant-provided, third party-generated documentation. If no public verification or tenant-provided documentation is available, third-party verification of the income amounts must be requested to calculate the change in income for the source.

HABD will create a special application for families eligible for the stream-lined process, to include a certification section, along with assets and deduction certifications. The application will also include HUD's required forms 9886 and 9887. Additional forms will be added as needed or required by HUD.

HABD must continue to abide by the Enterprise Income Verification (EIV) discrepancy requirements by addressing any discrepancies or new income sources reported in HUD's EIV system.

For any income determined pursuant to a streamlined income determination, third party verification of all income sources and amounts must be conducted every three years.

Interim Redetermination of Rent

The following changes may be reported by the family prior to the annual reexamination:

- Employment, unemployment or changes representing a decrease in income for employment of a permanent nature of the family, head, spouse or other wage earner eighteen years of age or older;
- All increases in income shall be reported during the annual reexamination period. If a household's income increases outside of the annual reexamination period, it should be reported the following period. No income increases will be processed outside of the annual reexamination period, unless the participant is on the Family Self Sufficiency (FSS) Program, in which, the reported increase in income is a positive reflection of previously set individual goals, which has an effect on their escrow account balance.

When HA Conducts Interim Reexamination

At any time, the HA may conduct an interim reexamination for a reduction in family income and change in composition.

At any time, the family may request an interim determination for a reduction in family income or change in composition because of any changes since the last determination. The HA must make the interim determination within a reasonable time after the family request.

Attachment E

Revised Operation and Management



ATTACHMENT E: OPERATION and MANAGEMENT

Statement of Rules, Standards and Policies of the PHA Governing Maintenance and Management of Housing Owned, Assisted or Operated by the PHA which includes the Prevention and Eradication of Pests.

Pest Control

PENDING UPDATED INFORMATION

Management of PHA Programs - HABD administers the following programs:

PENDING UPDATED INFORMATION

Information Technology (IT)

HABD's management is supported and advanced by an effective information technology program. Several critical programs are planned for implementation during the plan year
Objective: Implement and support methods to minimize cost and provide smarter solutions that enable better use of technology to directly support HABD and its communities in relation to HABD Agency goals and mission.

The Housing Authority of the Birmingham District has partnered with Yardi Systems as our central data processing system. Many solutions within the Yardi application suite have been implemented to date. The Housing Authority of the Birmingham District looks to continue that growth with the service provider. IT is working with Yardi to implement their Grants, and Contracts/Job Cost/Construction Management modules.

Grants – Yardi offers a portal that streamlines the entire grant application process allowing HABD to maximize qualification across programs while saving time. The solution provides a centralized hub where all HABD grant programs are accessible in one place. Yardi grant solution will help HABD manage eligibility, applications, and disbursements, reducing administrative burdens.

Contracts/Job Cost/Construction – This solution will help HABD gain better visibility and mitigate risk on capital and tenant improvement projects and improve contract management with Contract and RFP creation, publishing, bidding, and vendor self-service. HABD will be able to compare bids to budget, analyze cost variance, level bids, review responses, and ultimately award jobs and select vendors.

IT is assisting Human Resources in the migration from Sage and IRecruit to ADP HR management services. Sage and IRecruit are two separate applications utilized by HR to process and manage all existing and past employees' records. ADP HR services will streamline the HABD HR management process by combining multiple processes into one application. ADP will provide an easy-to-navigate online interface compatible with all devices for employees to view their records.

The Housing Authority of the Birmingham District is looking to upgrade its telecommunication platform from the traditional landline and PBX phone system to cloud-based phone systems that offer greater flexibility and freedom. The biggest differentiator: hardware. Access to advanced business phone features

on a traditional landline requires expensive hardware and setting up and maintaining a PBX system. Along with the monthly expensive service rates from the local phone company. Cloud-based phone and communications systems now include advanced business features including call routing and enhanced mobility. This means you are no longer tied to your desk or an office when it comes to accessing your work phone. You'll also get greater control over your phone system, and charges with a complete and simplified view of your business in a detailed management app and 24/7 customer service.

IT will continue assessing/updating data processing systems, data security, and network/voice infrastructure to support future growth. For example, items such as; applications, servers, computers, 2FA, firewall, network switches, routers, fiber connections, and VoIP.

Human Resources

PENDING UPDATED INFORMATION

Organizational Chart

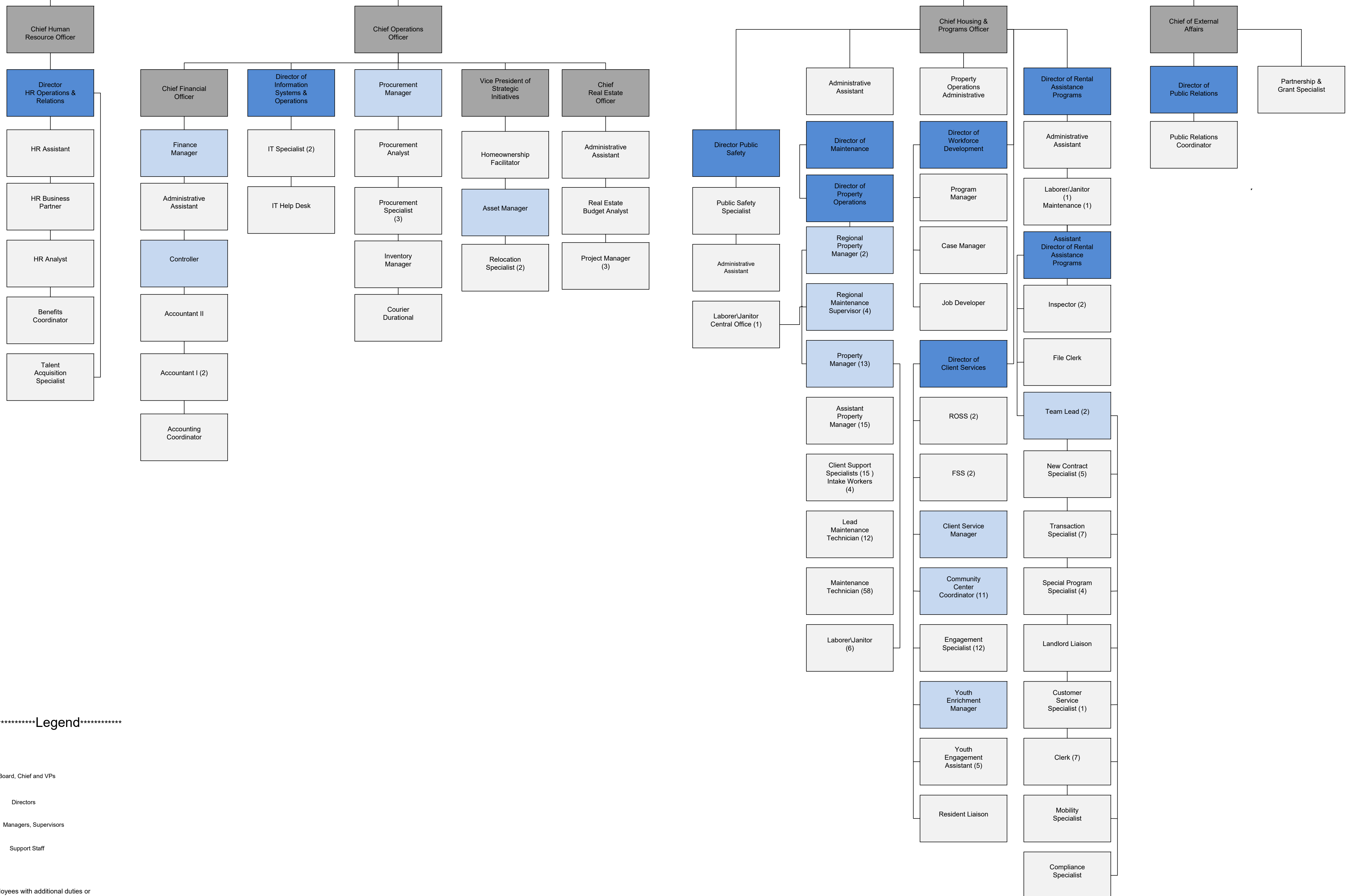
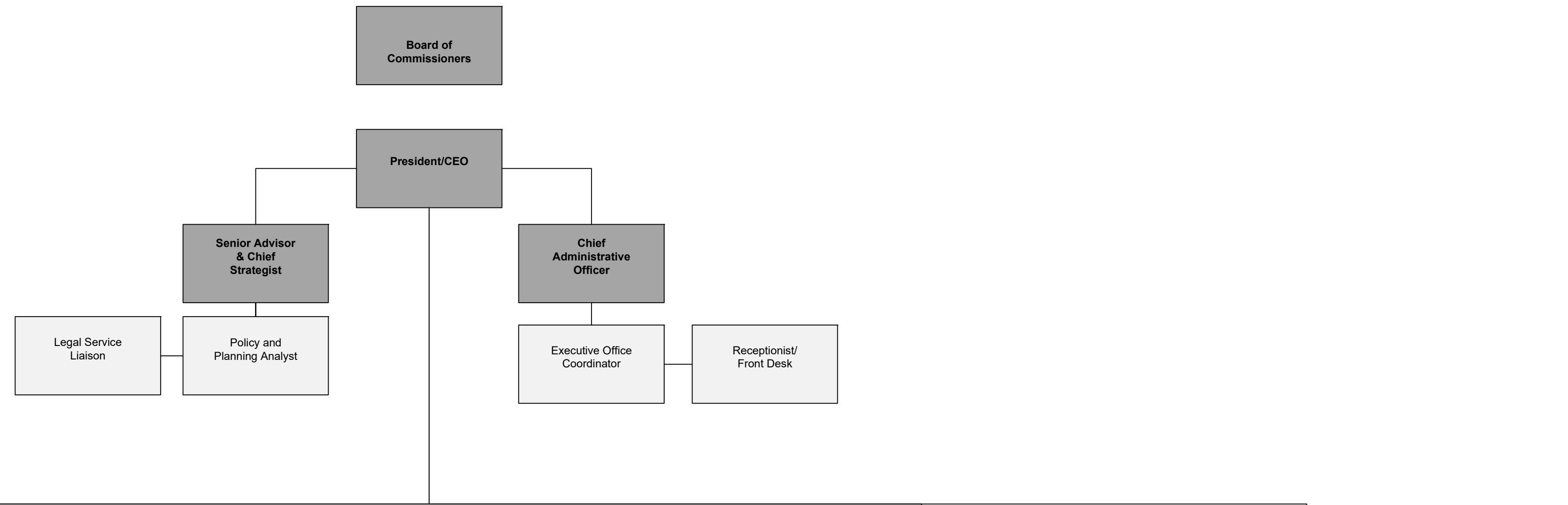
See attached - This proposed organizational chart will be refined as we continue to analyze the structure of the organization, budgetary resources, and programmatic needs.

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Attachment E: Operations and Management (Human Resources) Revised Organizational Chart



HABD Organizational Chart
January 5, 2024



*****Legend*****

- Board, Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

*employees with additional duties or interim role

Director of Rental Assistance Programs

Attachment F Grievance Procedures



ATTACHMENT F: GRIEVANCE PROCEDURES AND PET POLICY

HABD's Grievance Procedures and Pet Policy are contained in the ACOP and Administrative Plan and have not been revised.

Attachment G

Homeownership Program



ATTACHMENT G: HOMEOWNERSHIP

Homeownership Program

Strategic Initiatives is in the process of rebuilding our agency's capacity to transition families from a rental unit to a path to homeownership. HABD has units in Fountain Heights, Mason City, and Tuxedo (Ensley) communities that are currently in use by tenants, some of which are interested in purchasing the unit they live in. HABD's Homeownership program is based on a 5(h) Lease-Home Ownership Program with the purpose of providing affordable home ownership opportunities for working class families. The program currently has an inventory of thirty-five (35) units to repurpose into homeownership.

Strategic Initiatives is engaged with local housing counseling agencies to begin the process of getting our program participants "mortgage ready". This is accomplished by engagement with our HUD Approved counseling partner agencies such as Neighborhood Housing Services of Birmingham, Birmingham Urban League, and Operation HOPE to provide a qualifying First

Time Homebuyer Class (8 hours) and individual counseling of the residents. Strategic Initiatives has also re-engaged with local lenders who still participate through Public Housing Programs and Housing Choice Vouchers to ensure that potential homeowners have the needed financing to make the purchase (Bancorp/Cadence and Renasant Bank). Homeownership is also engaged with the Department of Community Development for the City of Birmingham on ensuring our clients/residents have access to down payment assistance programs that can assist with the sustainability of their home purchase.

Supporting Activities:

Building upon success of clients served under the 5(h) program, Strategic Initiatives has recruited and hired a Lease/Purchase Facilitator to execute the following activities:

- i. File evaluation for Tuxedo/Fountain Heights/Mason City rental single family units.
- ii. Continue to engage with HUD Approved counseling agencies to prepare our residents for the transition to homeownership.
- iii. Coordination of Homebuyer Education Workshops (below are activities that have already occurred)
 - a. Tuxedo (Nov 16, 2023)
 - b. Cooper Green (x2)
 - c. Harbert Center
 - d. Social Venture with Operation Hope
 - e. Coordination of smaller homeownership education events by site
 - f. One on One counseling sessions

- g. Prioritization of FSS, Section 8, and current Lease/Purchase participants
- iv. Establish counseling practices in accordance with Housing and Urban Development’s National Industry Standard for approved housing counseling agencies. Including establishment of software repository for client information to be reported to department head, HABD leadership team, and HUD. Reporting to be shared monthly.
- v. Successfully complete HUD approved counseling certification

Critical Needs:

- i. Office Space for Lease-Purchase/Homeownership Facilitator.
- ii. Completion of training for HUD certification test and transition.

Single Family Units:

IBF Number: B24002 was approved on November 9, 2023 for capital improvements to be made on the units identified in the first tranche of single-family detached units for disposal under the current 5(h) homeownership plan. The next step is the signature of contracts by The Mitchell Group and The Robinson Group. Once those contracts are executed, a meeting with the principles of each group will convene to discuss final logistics, operating plan, and expected timeline for completion.

Inventory and Capital Improvements:

In 2023, the board of commissioners authorized the Housing Authority of the Birmingham District to begin capital improvements on eleven (11) single family units in the agency’s inventory. Homeownership requested the CounselorMax CRM software to effectively manage the caseload of clients from Public Housing, FSS, and residents who are over the income threshold. The software provides tracking mechanisms for budgets, credit reports, and milestones for the client(s) to achieve their financial goals and allow for HABD to keep track of their progress.

Occupied Units for Purchase	
Address	Notes
2047 Avenue O Ensley	
1617 21 st Street Ensley	
2049 Avenue O Ensley	
1529 17 th Street N	Approved with local lender
2046 Avenue P Ensley	
Vacant Single Family Units	
Address	Property Site
1316 21 st Street Ensley	Tuxedo
2049 Avenue P Ensley	Tuxedo
1612 21 st Street Ensley	Tuxedo
1608 Avenue D Ensley	Tuxedo
1309 15 th Court N	Fountain Heights

1913 16 th Street SW	Mason City
1912 15 th Way SW	Mason City
1801 15 th Street SW	Mason City
1916 15 th Way SW	Mason City
Number of Single Family Units	
Location	AMP#
1812 14 th Way SW Birmingham	AL001000040
1816 14 th Way SW Birmingham	AL001000040
1820 14 th Way SW Birmingham	AL001000040
1921 15 th Street SW Birmingham	AL001000040
1913 16 th Street SW Birmingham	AL001000040
1312 15 th Ave N Birmingham	AL001000040
1801 15th Street SW, Birmingham, AL	AL001000042
1916 15th Way SW, Birmingham, AL	AL001000042
1917 16th Street SW, Birmingham, AL	AL001000042
1912 15th Way SW, Birmingham, AL	AL001000042
1309 15th Court N, Birmingham, AL	AL001000042
1512 21 st Street Ensley	AL001000044
1516 21 st Street Ensley	AL001000044
2044 Avenue P	AL001000044
2046 Avenue P	AL001000044
2048 Avenue P	AL001000044
2045 Avenue P	AL001000044
2047 Avenue P	AL001000044
2049 Avenue P	AL001000044
1613 21 st Street Ensley	AL001000045
1617 21 st Street Ensley	AL001000045
1612 21 st Street Ensley	AL001000045
1616 21 st Street Ensley	AL001000045
1612 22 nd Street Ensley	AL001000045
1616 22 nd Street Ensley	AL001000045
2044 Ave O Ensley	AL001000046
2045 Ave O Ensley	AL001000046
2046 Ave O Ensley	AL001000046
2047 Ave O Ensley	AL001000046
2048 Ave O Ensley	AL001000046
2049 Ave O Ensley	AL001000046
1608 Ave D Ensley	AL001000046
2049 Ave O Ensley	AL001000046
1608 Ave D Ensley	AL001000046

Attachment H

Revised Community Service and Self Sufficiency Programs



PENDING REVISION - ATTACHMENT H: COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS Statement of Public Housing Community Service

Community service must be performed by every non-exempt resident, consistent with the requirements of this policy. Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service does not include political activities.

Each non-exempt, adult (18 years or older) public housing resident, for and during each month of occupancy, must:

- a. Contribute eight hours of community service; or
- b. Participate in a self-sufficiency program for eight hours; or
- c. Perform eight hours of combined activities as described in items one and two.

Exemption is required for an adult who:

- a. Is 62 years of age or older; or
- b. Qualifies with disabilities that prevent the individual's compliance. The individual must provide appropriate documentation to support the qualifying disability, which may include self-certification; or is the primary caretaker of such individual is exempt; or
- c. Is engaged in work activities as defined in section 407(d) of the Social Security Act;
- d. Is participating at least eight hours a month in a welfare-to-work program; or
- e. Is a member of a family receiving assistance from and in compliance with a State program funded under Part A, Title IV of the Social Security Act; or
- f. Currently working at least 20 hours per week.

Proof of Compliance and Enforcement

Each head of household must present to the HABD property management office, for the site of residence, documentation that all persons, eighteen years of age or older living in the household, who are not exempt, have complied with this section.

Documentation may include a letter from the agency on letterhead or another official document. Any such documentation shall be verifiable by the HABD. Failure to comply with the Community Service Requirement and to provide appropriate verifiable documentation prior to the date required shall result in the lease not being renewed by the HABD. HABD may allow the family member who is not in compliance to complete the requirements within the following year as follows:

- a. The head of household and the person not in compliance shall sign an agreement stating that the deficiency will be cured within the next twelve months.
- b. The head of household annually at re-certification shall make proof of compliance with the agreement.
- c. Failure to comply with the agreement shall result in the lease being terminated for such non-compliance, unless the person(s) other than the head of household no longer resides in the unit and has been removed from the lease.

Services and Programs			
Program Name & Description (including location, if appropriate)	Application Method Waiting List Random Selection Specific Criteria	Access (development office/PHA Rental Office)	Eligibility (public housing or HCV participants or both)
FSS Section 8 Participant	Referrals	Site Office	Section 8
	Mail In		
	Electronic Database		
	Waiting List		
FSS Public Housing Participant	Mail In		Public Housing
	Electronic Database		RAD Conversion
	Waiting List		

1. FSS Programs

FSS Participation		
Program	Required Number of Participants	Actual Number of Participants (As of 03/08/2023)
Public Housing	50	71
HCV	50	83

Attachment H: Family Self Sufficiency (FSS) Revised Action Plan

Accepted by HUD on September 19, 2022



FSS Program Action Plan:

The Family Self-Sufficiency (FSS) Program of the Housing Authority of the Birmingham District (HABD) is committed to providing the highest quality of housing and related services to the FSS Program participants. In an effort to encourage residents to reach their fullest potential and become self-sufficient, the HABD will collaborate with community supportive services that provide education, job training, etc., with housing assistance for residents through the FSS Program.

The FSS Program was developed by the U.S. Department of Housing and Urban Development (HUD), and is a voluntary program designed to encourage Public Housing (PH) and Housing Choice Voucher (HCV) residents while they are advancing their education, job skills, and/or employment.

The FSS Program serves as a catalyst for families to accept responsibility for themselves as they move toward achieving economic independence and self-sufficiency through advancing their education and employment. The HABD FSS Program is implemented by the PH and HCV FSS Coordinator under the supervision of the Senior Director of Property Operations and Client Services.

GOALS

The HABD goal is to develop and implement a successful FSS Program for residents of PH and HCV Programs. The program will prepare families to become self-sufficient by providing them with educational opportunities, development and/or enhancement of job skills, job placement, homeownership counseling, and other related supportive services.

The HABD will implement its goal with the following aims:

Goal 1: Maintain the participation rate in the FSS Program to at least 100% annually, per coordinator.

Goal 2: 100% of FSS Participants will obtain and maintain stable employment

Goal 3: Increase the number of the FSS Participants with Escrow Accounts annually

Goal 4: To continue to host the annual George A. Pegues Memorial FSS Golf Tournament fundraiser.

Goal 5: To sponsor an annual Employment and Resource Fair in an effort to increase the number of working families participating in the program

Goal 6: To assist all FSS participants in completion of the program through case management.

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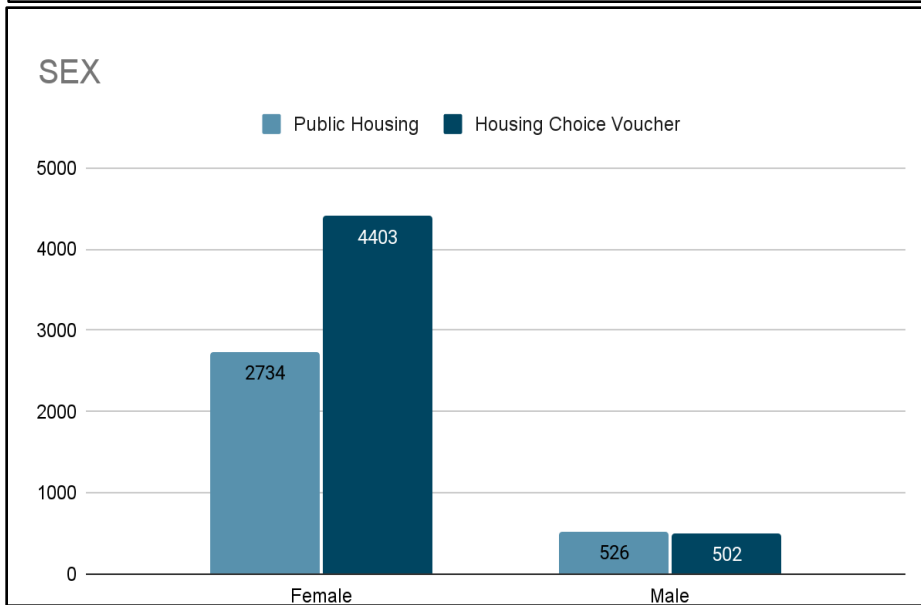
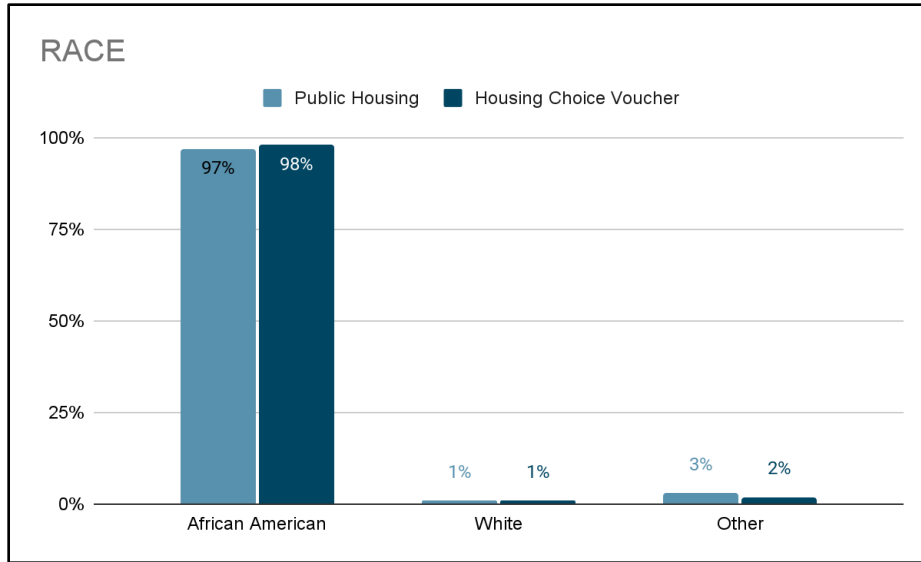
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Goal 6: To assist all FSS participants in completion of the program through case management.

FAMILY DEMOGRAPHICS

The HABD uses its public and assisted housing family demographics to identify supportive service needs for the families expecting to participate in the FSS Program. The HABD FSS Program will reflect the Agency's public and assisted housing population. The population breakdown is approximately 97% African American (Public Housing); 98% African American (HCV); 1% White (Both Public Housing and HCV) and 2% other racial groups. Most participants will be female heads of households with or without children. **HABD will serve 100 families, fifty (50) Public Housing and fifty (50) Housing Choice Voucher.**



SUPPORTIVE SERVICES TO BE OFFERED FOR PARTICIPANTS

The HABD’s FSS Program, through its partners on the Program Coordinating Committee, will provide the following activities and support services to FSS families:

Support Service General	Support Service Specific	Source/Partner
Child Care	Day Care Afterschool Care Homework Assistance Mentoring Services	Childcare Resources Big Brother/Big Sister

Transportation	Bus/Buss Passes Lyft Assistance	Max Transit Authority Jeff. Co. Family Resource Center Lyft
Education	GED Preparation Dropout Recovery Program Post-Secondary Education	Birmingham City Schools Jefferson State Community College Lawson State Community College Maranathan Academy UAB Educational Opportunity Center
Employment	Job Placement Resume Writing Interview Skills	Birmingham Career Center AIDT Snelling Personnel Staffing Personnel Board of Jefferson Co. Jefferson County DHR (JOBS)
Training	Job Readiness Training Skill Training	AIDT Innovate Birmingham Jefferson State Community College Lawson State Community College HABD Youthbuild
Health Care	Primary Care Mental Health Crisis Services Alcohol and Drug Prevention Alcohol and Drug Treatment	Crisis Center Impact Family Counseling AL Dept of Rehab Services ROSS United Health Care Cahaba Medical
Homeownership	Financial Literacy Credit Counseling Homeownership Counseling Debt Resolution IDA	Community Bank Neighborhood Housing Services United Way

FAMILY SELF-SUFFICIENCY PARTICIPATION SELECTION

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to the program capacity limits. The waiting list will include the name, contact information for the head of household of the applicant family, and the date of their application.

The selection process for families participating in the FSS Program are as follows:

- The participant must currently be a Public Housing or Housing Choice Voucher HABD resident

- The individual terminated will not be eligible to apply for participation for a period of one year following termination. Upon the completion of the one year, and at the discretion of the HABD, the family may be eligible for re-enrollment and beginning a new Contract of Participation
- The participant must complete and submit an FSS Interest Form to the PH FSS Coordinator, HCV FSS Coordinator, or other HABD Staff
- The PH FSS Coordinator and/or HCV FSS Coordinator will review the FSS Interest Form and follow up with letter to schedule an individual appointment to complete the FSS Contract of Participation

A family's election not to participate in the FSS Program will not affect the terms of their current Public Housing or Housing Choice Voucher Lease Agreement.

FAMILY SELF-SUFFICIENCY NON-PREFERENCE

The FSS Program will maintain a database of all interested applicants. This database will serve for selection of applicants for future vacancies within the program. The HABD does not discriminate against applicants because of their race, gender, age, sexual orientation, religion, marital status, number of children, skills or developmental disabilities.

PARTICIPATION OUTREACH

The FSS Program will distribute information throughout all of the HABD Public Housing Communities and Section 8 Offices. The following efforts will be administered:

LOCATIONS	RESPONSIBLE PARTIES	METHODS (IN PERSON/VIRTUAL)
Briefings/Orientations	HABD Staff	Flyer Interest Forms
Interims/Recertifications	HABD Staff	Flyer Interest Forms
Transfers/Portability	HABD Staff	Flyer Interest Forms
Lobbies	HABD Staff	Flyer Interest Forms
Community Centers	HABD Staff	Flyer Interest Forms
Resident Council Meetings	FSS Coordinators	PowerPoint Presentation

LOCATIONS	RESPONSIBLE PARTIES	METHODS (IN PERSON/VIRTUAL)
		Flyer Interest Forms

After the prospective participant has been interviewed by the FSS Coordinator and accepted as a participant, the FSS Coordinator will work directly with him or her in preparing the Contract of Participation. This contract will specifically identify education, career and family goals, and set forth a timetable for achieving these goals within term of the contract.

For all case management functions, such as initial interviews, home visits, etc., the HABD PH and HCV FSS Coordinators will perform one-on-one assessments to determine the needs of the participating families. Based on these assessments, coordinators will deliver appropriate services.

INCENTIVES

One of the most important components that contributes to the success of the FSS Program is the motivation each participant demonstrates in order to complete the terms of the Contract of Participation. Therefore, all participants will be interviewed prior to being accepted into the program.

A. Escrow Account

The HABD will establish and deposit funds to individual FSS escrow accounts for FSS participants in accordance with HUD regulations as outlined in the Code of Federal Regulations, Section 984.305.

B. Interim Disbursements

Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in the Individual Training and Services Plan (ITSP). Requests must be in writing in the participants own words.

C. Training, Education, and Workshops

Through the PCC and other forums, the HABD FSS Program will connect the FSS participants with job training, educational, and social service agencies to provide the supportive services necessary to develop self-sufficiency. In addition, FSS families will be provided on local homeownership opportunities.

PROGRAM COORDINATING COMMITTEE (PCC)

The HABD has established and will maintain a Program Coordinating Committee (PCC) whose function will be to assist in securing commitments of public and private resources (supportive

- g. Prioritization of FSS, Section 8, and current Lease/Purchase participants
- iv. Establish counseling practices in accordance with Housing and Urban Development’s National Industry Standard for approved housing counseling agencies. Including establishment of software repository for client information to be reported to department head, HABD leadership team, and HUD. Reporting to be shared monthly.
- v. Successfully complete HUD approved counseling certification

Critical Needs:

- i. Office Space for Lease-Purchase/Homeownership Facilitator.
- ii. Completion of training for HUD certification test and transition.

Single Family Units:

IBF Number: B24002 was approved on November 9, 2023 for capital improvements to be made on the units identified in the first tranche of single-family detached units for disposal under the current 5(h) homeownership plan. The next step is the signature of contracts by The Mitchell Group and The Robinson Group. Once those contracts are executed, a meeting with the principles of each group will convene to discuss final logistics, operating plan, and expected timeline for completion.

Inventory and Capital Improvements:

In 2023, the board of commissioners authorized the Housing Authority of the Birmingham District to begin capital improvements on eleven (11) single family units in the agency’s inventory. Homeownership requested the CounselorMax CRM software to effectively manage the caseload of clients from Public Housing, FSS, and residents who are over the income threshold. The software provides tracking mechanisms for budgets, credit reports, and milestones for the client(s) to achieve their financial goals and allow for HABD to keep track of their progress.

Occupied Units for Purchase	
Address	Notes
2047 Avenue O Ensley	
1617 21 st Street Ensley	
2049 Avenue O Ensley	
1529 17 th Street N	Approved with local lender
2046 Avenue P Ensley	
Vacant Single Family Units	
Address	Property Site
1316 21 st Street Ensley	Tuxedo
2049 Avenue P Ensley	Tuxedo
1612 21 st Street Ensley	Tuxedo
1608 Avenue D Ensley	Tuxedo
1309 15 th Court N	Fountain Heights

services, jobs, etc.) for the operation of the program. The committee is composed of a cross section of community and business leaders and program participants. The PCC will assume an advisory role in the FSS Program and the HABD's FSS Coordinators will assume the leadership role. The PCC will meet on a quarterly basis to review and recommend, when needed, revision to the FSS Action Plan and assist with fundraising activities.

The PCC membership will include leadership from the following:

- Two (2) Public Housing (PH) FSS Program Participants
- Two (2) Housing Choice Voucher (HCV) FSS Program Participants
- Two (2) HABD Representatives (i.e., Community Center Coordinator or Property Manager)
- Snelling
- Family Guidance Center
- Impact Family Counseling
- Innovate Birmingham
- Lawson State Community College
- Salvation Army
- Dannon Project
- Neighborhood Housing Services
- Birmingham Urban League
- Family Resource Center
- United Way
- West Garden Home Care
- Jefferson County Department of Human Resources
- Community Care Development Network
- Max Jefferson County Transit Authority
- Personnel Board of Jefferson County

Representatives from any other public and private service providers and private business in accordance with [24CFR 984.202(b)(2)].

The PH residents, HCV residents, and HABD Representatives who serve on the PCC will serve for a term of one (1) year to allow the broadest representation of participants. These persons will be replaced by selecting new individuals to serve. The Program Coordinating Committee will continue to operate according to the HUD guidelines and the HABD FSS PCC Bylaws (See Appendix).

CONTRACT OF PARTICIPATION

All applicants selected for participation in the FSS Program will be required to sign a Contract of Participation. The HABD will use the contract format approved by HUD and will include an Individual Training and Service Plan (ITSP). The contract will include the family's annual income, earned income, and the family rent (tenant rent plus utility allowance) in effect as of the effective date of the contract.

A. Family Responsibilities

Family responsibilities under the Contract of Participation include, but are not limited to, the following requirements:

1) *Head of FSS Family must:*

- a. Seek and maintain suitable employment.
 - i. As defined in the FSS regulations (24 CFR 984.303(4)(iii)), a determination of what constitutes “suitable employment” for each family member with a goal of seeking and maintaining it will be made by the HABD, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on available job opportunities within the community.
- b. Complete the interim goals, final goals, and any other activities by the completion dates contained in each ITSP.

2) *All family members must:*

- a. Comply with the terms of the lease
- b. If receiving welfare assistance, become independent of welfare assistance by the end of the Contract term
- c. If participating in the HCV program, the family must comply with the family obligations under the HCV program and live in the jurisdiction of the PHA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family’s request to move outside its jurisdiction under portability.

B. Graduation from the FSS Program and Disbursement of Escrow

At the discretion of the PHA/owner, the PHA will disburse to the head of the FSS family the amount in the family’s FSS escrow account, less any amount owed to the PHA/owner (for unpaid rent or other outstanding debts), when the family is compliant with its lease, and:

- a. The PHA/owner determines that the family has completed the terms of the contract, including the terms of all ITSPs; and
- b. The head of FSS family certifies that no member of the FSS family is a recipient of welfare assistance.

C. Contract Extension

A participant in the FSS program may request, in writing, an extension of the contract if the family is unable to complete its goals within the term of the contract due to circumstances beyond the family’s control. The HABD may extend the term of the Contract of Participation, not to exceed two (2) years for a “good cause”.

“Good Cause” is defined by, but not limited to, the following :

- Short-term Illness of Head of FSS Family/Other: this includes illness of the contracted resident or other family member requiring the presence of the contracted resident. If the duration of the illness is more than thirty (30) days,

a review will be conducted to determine if the existing Contract of Participation should be terminated, with the possibility of later reinstatement

- Inadequate/Unavailable Childcare: if the problem is long-term or frequent, the HABD may recommend alternative childcare options through the local child care management agency
- Supportive Services Issues: this includes a breakdown for disruption in established support services, other than child care or transportation, with no ready access to an alternative service
- Conflicting Demands: this includes individuals who miss appointments or fail to attend an activity due to job interviews, court appearances, employment, or educational obligations during the time the activity occurs.
- Personal or Family Crisis: this includes any kind of crisis or household emergency that interferes with participation, such as the death of a family member, or other justifiable circumstance

D. Termination of the FSS Contract of Participation

a. Involuntary Termination

The HABD may involuntarily terminate a family from FSS under the following circumstances

- i. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:
 1. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 2. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 3. Failure to complete activities and/or goals within the specified time frames; and/or
- ii. If the participant's housing assistance has been terminated

b. Voluntary Termination

- i. Participants may also be terminated for the FSS program under the following circumstances:
 1. Mutual consent of both parties; and/or
 2. The family's withdrawal from the program

The HABD must give a notice of termination to the head of the FSS family. The notice must state the reasons for the HABD decisions to terminate the contract.

E. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the Contract will be terminated with FSS disbursement when one of the following situations occur:

- a. Services that the HABD and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable

- b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the HABD and the FSS family.
- c. An FSS family in good standing moves outside of the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR 982.353) for good cause, as determine by the PHA, and continuation of the Contract after the move, or completion of the Contract prior to the move, is not possible.

F. Modification

The HABD and the family may mutually agree to modify the Contract of Participation with respect to the ITSP and/or contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the HABD as well as the Head of FSS Family. The HABD will allow for modifications to the Contract of Participation under the following circumstances:

- a. When the modifications to the ITSP improve the participant's ability to complete their obligations in the Contract or progress toward economic self-sufficiency
- b. When the designated head of the FSS family ceases to reside with other family member in the assisted unit, and the remaining family members, after consultation with the HABD, designate another family member to be the FSS head of family
- c. When a relocating family is entering the FSS program of a receiving PHA and the start date of the Contract must be changed to reflect the date the new Contract is signed with the receiving PGA

G. Compliance

Each participant is expected to maintain compliance with the Contract of Participation and to consistently progress toward their stated goals. Non-compliance is defined as the participant's refusal or neglect to consistently progress toward his/her goals or the refusal or neglect to accept employment.

The HABD and the FSS family agree to comply with HUD regulations and requirements, including 24 CFR parts 887 and 984. To the extent that anything in the contract conflicts with HUD regulations or requirements, including parts 887 and 984, HUD regulations and requirements will prevail. Terms and figures, such as baseline income and baseline rent, are subject to correction by the HABD for compliance with HUD regulations and requirements. The HABD must notify the family in writing of any adjustments made to the contract.

MEETINGS, SEMINARS, & WORKSHOP PARTICIPATION REQUIREMENT

Program participants are required to attend sponsored meetings, seminars, and/or workshops designed to assists the families in becoming self-sufficient. These educational opportunities will link available community resources to participants. Participants must attend a minimum of eight (8) workshops/seminars throughout the year. Topics will include, but are not limited to the following:

- Money Management
- Credit Repair
- Interviewing Techniques
- Career Development
- Homeownership

The HABD HCV and PH Family Self-Sufficiency Coordinators are assigned case management responsibilities for each participant. The FSS Program is under the direct supervision of the Senior Director of Property Operations and Client Services, who ensures the HCV and PH FSS Program components are in compliance with the HABD policies and procedures, as well as HUD regulations.

GRIEVANCES

Any participant of the FSS Program may protest a decision, especially when adverse action is taken by the PHA against a family, the PHA is required to provide a grievance hearing in the public housing program, or an information hearing in the housing choice voucher program (24 CFR 966 subpart B, CFR 982.554).

All requests for an information hearing must be received by the HABD Coordinator within fourteen (14) business days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the information hearing will be made by mail.

Persons included in the informal hearing shall include, but not limited to:

- The FSS head of household;
- The FSS Coordinator; and
- HABD staff members, other than FSS program staff, serving as the Hearing Officer

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made in writing within five (5) days prior to the hearing date.

Adverse actions taken within the FSS program include:

- Denial of admission into the FSS program
- Denial of request for supportive services
- Denial of request to change the ITSP
- Denial of request to change the Head of Household
- Denial of request for interim disbursement of the escrow account
- Denial of request to complete the Contract
- Denial of a request for an extension
- Denial of request for final disbursement of the escrow account or any portion thereof
- Withholding of the support services
- Termination of the FSS Contract

VERIFICATION OF FAMILY CERTIFICATION

Before final disbursement of the FSS Escrow funds to the family, the HABD may verify that the FSS family is no longer a recipient of TANF, by requesting copies of any documents which may indicate whether the family is receiving any TANF, and/or contact the Jefferson County Department of Human Resources.

REPORTING

The HABD will submit a report to HUD regarding the FSS Program as required by the HUD Code of Federal Regulations (Title 24, Section 984.401). The report will include the following information:

- A description of the activities carried out under the program
- A description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency
- A description of the effectiveness of the program in coordination of resources within the local community to assist families to achieve economic independence and self-sufficiency
- Any recommendation by the HABD on the appropriate local Program Coordinating Committee for legislative or administrative action that would improve the FSS program and ensure the effectiveness of the program

GENERAL ASSISTANCE ACCOUNT

The Family Self-Sufficiency Program is designed to assist the HABD participants in becoming economically independent. However, from time to time, many families face situations where they may need financial support to help them in an emergency. The General Assistance Account has been established to assist participants who may encounter unforeseen emergencies such as car repairs, transportation assistance (bus passes) and childcare assistance. The FSS Program is supported by the Annual George A. Pegues Memorial FSS Golf Tournament. Funding to cover the individual needs of the program is an important component of the program.

The following guidelines have been established to ensure the continuation of funds available from this account:

- Submission of the General Assistance Application
- Only one (1) request per year and not to exceed \$400
- Resident has twelve (12) months to repay half of the borrowed amount.
- Requests for funds must be directly related to the goals of the family, as stated in the FSS Contract of Participation or unforeseen circumstances.
- Original invoices for the usage of the funds must be submitted to the coordinator at the time of the request

Attachment I

Revised Safety and Crime Prevention



ATTACHMENT I: HABD does not have a revision for crime and safety provisions for the plan year.

Attachment J

Asset Management



REVISION PENDING - ATTACHMENT J: ASSET MANAGEMENT

Statement on Deferred Maintenance and Living Conditions at Public Housing Sites

As a part of yearly HUD requirements, all HABD Public Housing sites and units are inspected per the Uniform Physical Conditions Standards (UPCS) protocol. HABD contracted with a nationally recognized firm to conduct inspections during CY 2021 in accordance with the following conditions:

- a. HABD obtained a qualified, licensed, and professional firm to provide annual UPCS inspections and training for all public housing units and buildings.
- b. The annual inspection must comply with HUD requirements.
- c. The inspector provided a written report for each low-rent public housing unit, building, and development. The report should indicate if work orders were required, and if so, when the unit was re-inspected.
- d. The reports generated from this 100% UPCS inspection give HABD a snap shot in real-time as to the immediate condition of each unit thus allowing management and maintenance the necessary knowledge of conditions not meeting standards and allowing for maintenance to address immediate needs concerning living conditions at the properties. All reports will be shared with the Housing Operations Department. Upon receipt of these reports, Asset Maintenance Supervisors devise a detail plan of action from the report. The reports issued from these inspections include:
 1. Health and safety reports that note all exigent health and safety defects, as defined by REAC, and will be specifically documented to HABD on a daily basis. These issues will be abated by HABD maintenance staff within 24 hours of the finding.
 2. The Detailed Deficiency Report will include all level 1, 2, and 3 deficiencies for each unit, building, and development. This report will be used as a detailed back up for the PHAS inspection file.
 3. The unit deficiency review report provides a single sheet report for each unit should include all level 1, 2 and 3 deficiencies. This report serves as a unit-by-unit report purposed for the file of each resident's file.
- e. Tracking and Monitoring to Address Needs on a Monthly Basis
 1. From the UPCS inspection reports Asset Managers and/ or Asset Maintenance Supervisors will generate work orders to be placed in the Yardi property management software system. Monthly reports can be provide as needed to track these work orders.

HABD management and maintenance staff are still dealing with the dramatic effects of the COVID-19 pandemic on business processes. Employee absenteeism, supply chain, client illness, school closures, and continue to make basic operations challenging. Even still, site staff are working normal hours and we have resumed regular maintenance operations, housekeeping inspections, and are planning to resume the Preventative Maintenance Workplan.

Attachment K

Revised Substantial Deviation



ATTACHMENT K: SUBSTANTIAL DEVIATION

As part of the Rental Assistance Demonstration (RAD) Program, the Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, Section 18/RAD Blend regardless of whether the proposed conversion will include use of additional Capital Funds;
- b. Changes to the construction and/or rehabilitation plan for each approved RAD conversion;
and
- c. Changes to the financing structure for each approved RAD/Section 18 Blend conversion.

Attachment L
Revised Significant
Amendment/Modification



ATTACHMENT L: SIGNIFICANT AMENDMENT/MODIFICATION

As mandated by the HUD, a public housing authority must define a substantial change to the Agency Plan. If a proposed change to the Agency Plan is considered a “substantial change,” it must undergo a public process that includes: consultation with the Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed and approved by the Housing Authority Boards of Commissioners. Therefore, HABD defines significant changes to the Agency Plan as follow:

- a. Significant changes to tenant/resident admissions policies;
- b. Significant changes to the tenant/resident screening policy;
- c. Significant changes to public housing rent policies;
- d. Significant changes to the organization of the public housing or HCV waiting lists;
- e. Significant Changes in the use of replacement reserve funds under the Capital Fund Grant;
- f. Non-de-minimis changes to the identification of public housing units and/or property that will be subject to demolition, disposition, designation, or conversion activities; to exclude casualty or otherwise uninhabitable units.



Section B.2 contains new activities relating to the elements of the PHA Plan which are planned for Fiscal Year 2024. A summary of each revision is attached to this section.

Hope VI or Choice Neighborhoods. ✓

Mixed Finance 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 Assistance under RAD. Occupancy by Over- ✓

Income Families.

Occupancy by Police Officers.

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).

Attachment M

New Activities: HOPE VI and Choice Neighborhoods



B.2 NEW ACTIVITIES

ATTACHMENT M: HOPE VI and CHOICE NEIGHBORHOODS

The Housing Authority of the Birmingham District (HABD) received a Choice Neighborhood Implementation Grant in 2023 for \$50 million dollars for the Smithfield Court (AL001000009) community. HABD will commence development of the housing phases set forth in the CNI as noted below.

PHASE	NAME	ESTIMATED YEAR	TOTAL UNITS	REPLACEMENT UNITS
1	JCCEO HQ	2024	101	50
2	Parker High School Surplus A	2025	151	75
3	On-Site West (New Library)	2026	127	63
4	On-Site Center	2027	153	76
5	Library Site	2028	99	49
6	On-Site East	2029	149	74
7	Parker High School Surplus B	2030	140	69
	TOTAL		920	456

Attachment N

New Activities: Demolition and Disposition

Charts Showing Public Housing Units Proposed for Demolition and Disposition



The Housing Authority of the Birmingham District (HABD) intends to commence and/or complete the following demolition and disposition activities during the plan year.

1. **Multiple Properties** - Thirty-five (35) structural damaged units located in multiple properties as identified on the attached chart.
2. **Ralph Kimbrough Homes (AL001000018)**- Eight (8) units will be demolished that were damaged by fire resulting in a total loss of the units.
3. **Smithfield Court (AL001000009)** - Four hundred fifty-six (456) units will be demolished in accordance with the Choice Neighborhood Implementation Plan. It is expected that demolition will commence in 2025 and will be done in three phases.
4. **Marks Village** – Two hundred two dwelling units (202) and two (2) non-dwelling units will be demolished in accordance with the previous approval.
5. **Elyton Village Gymnasium (AL001000001)** – One (1) non-dwelling building will be demolished upon approval of a non-dwelling demolition application.

HOUSING AUTHORITY OF THE BIRMINGHAM
DISTRICT 35 Structurally Damaged Units to be Demolished

Property	Number of Units to be demolished	Address	Unit Number
Collegetown Center	3	3021 31 st Avenue North	160
		3064 30 th Avenue North	175
		3070 30 th Avenue North	178
Elyton Village	12	329 3 rd Street West	61
		331 3 rd Street West	62
		333 3 rd Street West	63
		335 3 rd Street West	64
		337 3 rd Street West	65
		339 3 rd Street West	66
		301 3 rd Street West	75
		303 3 rd Street West	76
		305 3 rd Street West	77
		307 3 rd Street West	78
		309 3 rd Street West	79
311 3 rd Street West	80		
Kimbrough Homes	1	2801-F Wilson Road	203
Marks Village	3	7529 66 th Courtway South	298
		7501 66 th Street South	225
		6531 Interlaken Avenue South	226
Morrell Todd Homes	5	824-A 46 th Place North	109
		842-B 46 th Place North	110
		4604 8 th Court North	111
		4606 8 th Court North	112
		4523-B 8 th Terrace North	119
North Birmingham Homes	3	3133 44 th Avenue North	46
		3151 44 th Avenue North	37
		3000 42 nd Avenue North	257
Smithfield Court	8	274 8 th Avenue North	463
		276 8 th Avenue North	464
		278 8 th Avenue North	465
		280 8 th Avenue North	466
		282 8 th Avenue North	467
		284 8 th Avenue North	468
		842 3 rd Street North	475
		844 3 rd Street North	476
TOTAL	35		

**Housing Authority Birmingham District
8 Casualty Loss Units to be Demolished**

	Property	Building Number	Unit Number	Address	Incident Date	Reported to Insurance Date	Expiration
1	AL001000018	000012	77	2904-A John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
2	AL001000018	000012	78	2904-B John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
3	AL001000018	000012	79	2904-C John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
4	AL001000018	000012	80	2904-D John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
5	AL001000018	000012	81	2904-E John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
6	AL001000018	000012	82	2904-F John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
7	AL001000018	000012	83	2904-G John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024
8	AL001000018	000012	84	2904-H John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	05/31/2024

Housing Authority of the Birmingham District 204 Units for Demolition Disposition			
Housing Development	Unit Number	Building Number	Property Address
AL001000006	1	1	7524 Georgia Road South
AL001000006	1	2	7526 Georgia Road South
AL001000006	2	1	7528 Georgia Road South
AL001000006	2	2	7530 Georgia Road South
AL001000006	2	3	7532 Georgia Road South
AL001000006	2	4	7534 Georgia Road South
AL001000006	2	5	7536 Georgia Road South
AL001000006	2	6	7538 Georgia Road South
AL001000006	2	7	7540 Georgia Road South
AL001000006	2	8	7542 Georgia Road South
AL001000006	3	1	7544 Georgia Road South
AL001000006	3	2	7548 Georgia Road South
AL001000006	3	3	7552 Georgia Road South
AL001000006	3	4	6400 Joppa Court South
AL001000006	4	1	6401 Joppa Court South

AL001000006	4	2	7554 Georgia Road South
AL001000006	4	3	7558 Georgia Road South
AL001000006	4	4	7560 Georgia Road South
AL001000006	5	1	7562 Georgia Road South
AL001000006	5	2	7564 Georgia Road South
AL001000006	5	3	7566 Georgia Road South
AL001000006	5	4	7568 Georgia Road South
AL001000006	5	5	7570 Georgia Road South
AL001000006	5	6	7572 Georgia Road South
AL001000006	6	1	7574 Georgia Road South
AL001000006	6	2	7578 Georgia Road South
AL001000006	6	3	7582 Georgia Road South
AL001000006	6	4	6400 Kimberly Ave South
AL001000006	7	1	6410 Kimberly Ave South
AL001000006	7	2	6412 Kimberly Ave South
AL001000006	8	1	6411 Joppa Court South
AL001000006	8	2	6409 Joppa Court South
AL001000006	9	1	7547 64th Courtway South

AL001000006	9	2	7545 64th Courtway South
AL001000006	10	1	7543 64th Courtway South
AL001000006	10	2	7541 64th Courtway South
AL001000006	10	3	7539 64th Courtway South
AL001000006	10	4	7537 64th Courtway South
AL001000006	10	5	7535 64th Courtway South
AL001000006	10	6	7533 64th Courtway South
AL001000006	10	7	7531 64th Courtway South
AL001000006	10	8	7529 64th Courtway South
AL001000006	11	1	7527 64th Courtway South
AL001000006	11	2	7525 64th Courtway South
AL001000006	12	1	7522 Georgia Road South
AL001000006	12	2	7520 Georgia Road South
AL001000006	13	1	7518 Georgia Road South
AL001000006	13	2	7516 Georgia Road South
AL001000006	13	3	7514 Georgia Road South
AL001000006	13	4	7512 Georgia Road South
AL001000006	13	5	7510 Georgia Road South

AL001000006	13	6	7508 Georgia Road South
AL001000006	14	1	7506 Georgia Road South
AL001000006	14	2	7504 Georgia Road South
AL001000006	14	3	7500 Georgia Road South
AL001000006	14	4	6401 Interlaken Ave South
AL001000006	15	1	6415 Interlaken Ave South
AL001000006	15	2	7501 64th Courtway South
AL001000006	15	3	7505 64th Courtway South
AL001000006	15	4	7507 64th Courtway South
AL001000006	16	1	7509 64th Courtway South
AL001000006	16	2	7511 64th Courtway South
AL001000006	16	3	7513 64th Courtway South
AL001000006	16	4	7515 64th Courtway South
AL001000006	16	5	7517 64th Courtway South
AL001000006	16	6	7519 64th Courtway South
AL001000006	17	1	7521 64th Courtway South
AL001000006	17	2	7523 64th Courtway South
AL001000006	18	1	7524 64th Courtway South

AL001000006	18	2	7526 64th Courtway South
AL001000006	19	1	7528 64th Courtway South
AL001000006	19	2	7530 64th Courtway South
AL001000006	19	3	7532 64th Courtway South
AL001000006	19	4	7534 64th Courtway South
AL001000006	19	5	7536 64th Courtway South
AL001000006	19	6	7538 64th Courtway South
AL001000006	19	7	7540 64th Courtway South
AL001000006	19	8	7542 64th Courtway South
AL001000006	20	1	7544 64th Courtway South
AL001000006	20	2	7546 64th Courtway South
AL001000006	21	1	6423 Joppa Court South
AL001000006	21	2	6421 Joppa Court South
AL001000006	22	1	6419 Joppa Court South
AL001000006	22	2	6417 Joppa Court South
AL001000006	22	3	6415 Joppa Court South
AL001000006	22	4	6413 Joppa Court South
AL001000006	23	1	6414 Kimberly Ave South

AL001000006	23	2	6416 Kimberly Ave South
AL001000006	23	3	6418 Kimberly Ave South
AL001000006	23	4	6420 Kimberly Ave South
AL001000006	24	1	6422 Kimberly Ave South
AL001000006	24	2	6424 Kimberly Ave South
AL001000006	25	1	6426 Kimberly Ave South
AL001000006	25	2	6428 Kimberly Ave South
AL001000006	26	1	6427 Joppa Court South
AL001000006	26	2	6425 Joppa Court South
AL001000006	27	1	6435 Joppa Court South
AL001000006	27	2	6433 Joppa Court South
AL001000006	27	3	6431 Joppa Court South
AL001000006	27	4	6429 Joppa Court South
AL001000006	28	1	6430 Kimberly Ave South
AL001000006	28	2	6432 Kimberly Ave South
AL001000006	28	3	6434 Kimberly Ave South
AL001000006	28	4	6436 Kimberly Ave South
AL001000006	29	1	6438 Kimberly Ave South

AL001000006	29	2	6440 Kimberly Ave South
AL001000006	30	1	6439 Joppa Court South
AL001000006	30	2	6437 Joppa Court South
AL001000006	31	1	7522 64th Courtway South
AL001000006	31	2	7520 64th Courtway South
AL001000006	32	1	7518 64th Courtway South
AL001000006	32	2	7516 64th Courtway South
AL001000006	32	3	7514 64th Courtway South
AL001000006	32	4	7512 64th Courtway South
AL001000006	32	5	7510 64th Courtway South
AL001000006	32	6	7508 64th Courtway South
AL001000006	33	1	7504 64th Courtway South
AL001000006	33	2	7502 64th Courtway South
AL001000006	33	3	7500 64th Courtway South
AL001000006	33	4	6421 Interlaken Ave South
AL001000006	34	1	6501 Interlaken Ave South
AL001000006	34	2	6503 Interlaken Ave South
AL001000006	34	3	6505 Interlaken Ave South

AL001000006	34	4	6507 Interlaken Ave South
AL001000006	35	1	6502 Joppa Avenue South
AL001000006	35	2	6500 Joppa Avenue South
AL001000006	36	1	6504 Joppa Avenue South
AL001000006	36	2	6506 Joppa Avenue South
AL001000006	36	3	6508 Joppa Avenue South
AL001000006	36	4	6510 Joppa Avenue South
AL001000006	36	5	6512 Joppa Avenue South
AL001000006	36	6	6514 Joppa Avenue South
AL001000006	37	1	6519 Interlaken Ave South
AL001000006	37	2	6517 Interlaken Ave South
AL001000006	37	3	6515 Interlaken Ave South
AL001000006	37	4	6513 Interlaken Ave South
AL001000006	37	5	6511 Interlaken Ave South
AL001000006	37	6	6509 Interlaken Ave South
AL001000006	38	1	6527 Interlaken Ave South
AL001000006	38	2	6525 Interlaken Ave South
AL001000006	38	3	6523 Interlaken Ave South

AL001000006	38	4	6521 Interlaken Ave South
AL001000006	39	1	6516 Joppa Avenue South
AL001000006	39	2	6518 Joppa Avenue South
AL001000006	40	1	6503 Joppa Court South
AL001000006	40	2	6501 Joppa Court South
AL001000006	41	1	6500 Kimberly Ave South
AL001000006	41	2	6502 Kimberly Ave South
AL001000006	42	1	6504 Kimberly Ave South
AL001000006	42	2	6506 Kimberly Ave South
AL001000006	42	3	6508 Kimberly Ave South
AL001000006	42	4	6510 Kimberly Ave South
AL001000006	43	1	6511 Joppa Court South
AL001000006	43	2	6509 Joppa Court South
AL001000006	43	3	6507 Joppa Court South
AL001000006	43	4	6505 Joppa Court South
AL001000006	44	1	6515 Joppa Court South
AL001000006	44	2	6513 Joppa Court South
AL001000006	45	1	6514 Kimberly Ave South

AL001000006	45	2	6516 Kimberly Ave South
AL001000006	101	1	7551 65th Courtway South
AL001000006	101	2	7549 65th Courtway South
AL001000006	101	3	7547 65th Courtway South
AL001000006	101	4	7545 65th Courtway South
AL001000006	102	1	7531 65th Courtway South
AL001000006	102	2	7529 65th Courtway South
AL001000006	102	3	7527 65th Courtway South
AL001000006	102	4	7525 65th Courtway South
AL001000006	103	1	7543 65th Courtway South
AL001000006	103	2	7541 65th Courtway South
AL001000006	103	3	7539 65th Courtway South
AL001000006	103	4	7537 65th Courtway South
AL001000006	103	5	7535 65th Courtway South
AL001000006	103	6	7533 65th Courtway South
AL001000006	104	1	7532 65th Courtway South
AL001000006	104	2	7534 65th Courtway South
AL001000006	104	3	7536 65th Courtway South

AL001000006	104	4	7538 65th Courtway South
AL001000006	104	5	7540 65th Courtway South
AL001000006	104	6	7542 65th Courtway South
AL001000006	105	1	7524 65th Courtway South
AL001000006	105	2	7526 65th Courtway South
AL001000006	105	3	7528 65th Courtway South
AL001000006	105	4	7530 65th Courtway South
AL001000006	106	1	7544 65th Courtway South
AL001000006	106	2	7546 65th Courtway South
AL001000006	106	3	7548 65th Courtway South
AL001000006	106	4	7550 65th Courtway South
AL001000006	111	1	7545 Marks Drive South
AL001000006	111	2	7547 Marks Drive South
AL001000006	111	3	7549 Marks Drive South
AL001000006	111	4	7551 Marks Drive South
AL001000006	111	5	7553 Marks Drive South
AL001000006	111	6	7555 Marks Drive South
AL001000006	115	1	7525 Marks Drive South

AL001000006	115	2	7527 Marks Drive South
AL001000006	115	3	7529 Marks Drive South
AL001000006	115	4	7531 Marks Drive South
AL001000006	115	5	7533 Marks Drive South
AL001000006	115	6	7535 Marks Drive South
AL001000006	116	1	7537 Marks Drive South
AL001000006	116	2	7539 Marks Drive South
AL001000006	116	3	7541 Marks Drive South
AL001000006	116	4	7543 Marks Drive South


**Housing Authority of the Birmingham District Elyton Village Gymnasium
Proposed Demolition Disposition**

Housing Development	Building	Property Address
AL001000001	Gymnasium	31 4th Court West, Birmingham, AL 35204

Attachment O
New Activities: Conversion of Public
Housing to Project Based Assistance under
RAD – “Thrive 2035”



ATTACHMENT O: CONVERSION OF PUBLIC HOUSING to PROJECT-BASED ASSISTANCE under RAD

 **Thrive 2035** is the strategic framework through which the Housing Authority of Birmingham District will reposition our Public Housing portfolio and create new affordable housing in the City of Birmingham through the creation of **public/private partnerships** utilizing **private capital**. Conversion tools provided by HUD will result in the **elimination of all Public Housing** through the transition to other affordable housing platforms.

Repositioning is a mechanism through which properties are removed from the federal public housing restrictions and converted to project based rental assistance allowing access to private capital for renovation and redevelopment.

Decreased federal funding has resulted in a backlog of capital needs for public housing across the country of over \$60 Billion dollars. HABD estimates our capital needs at over \$500,000 million. HUD has provided PHA's with a variety of tools to reposition the Public Housing portfolio and HABD anticipates use of most tools available as described further below.

Thrive 2035 is the culmination of months of planning in which Public Housing properties have been assessed to determine continued viability. Based on physical and financial assessments, properties will be repositioned utilizing various redevelopment methods including moderate and substantial rehabilitation; disposition and demolition; and new construction of replacement units.

Our real estate repositioning strategy will improve the quality of affordable housing and assure that there is no loss of any affordable housing units in our community. HABD has partnered with experienced Development Teams to assist us in expediting our repositioning strategy.

RAD AND SECTION 18 BLEND WITH TRANSFER OF ASSISTANCE

The Housing Authority of Birmingham District (HABD) intends to submit RAD applications to convert the majority of the Public Housing communities to Project Based Vouchers (PBV) under the guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to PBVs, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-23, REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are described below. Additionally, the Housing Authority of Birmingham District certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HABD with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that HABD may also borrow funds to address their capital needs. HABD will also contribute Capital Funds, Public Housing Reserve Funds and non-federal funds to support the repositioning of the properties, as applicable.

The RAD conversions will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. Any change in bedroom distribution will be based on needs of the existing residents to assure protection all residents in accordance with the resident rights under the RAD Program.
3. It is anticipated that there will be RAD Transfer of Assistance to other locations/properties within Birmingham and no redevelopment of the existing public housing site. The TOA projects were determined based on environmental factors that may impede redevelopment of the existing site.

The chart below identifies each of the properties and the anticipated repositioning strategy.

PROJECT #	PROJECT NAME	# UNITS	REPOSITIONING STRATEGY
AL001000001	Elyton Village	478	RAD/Section 18 Blend
AL001000006	Marks Village	500	RAD/Section 18 Blend Transfer of Assistance
AL001000009	Smithfield Court	456	CNI/RAD/Section 18 Blend
AL001000010	Tom Brown Village	248	RAD/Section 18 Blend
AL001000011	Rev. Dr. Morrell Todd Homes	456	RAD/Section 18 Blend/Transfer of Assistance
AL001000013	Collegeville	394	RAD/Section 18 Blend/Transfer of Assistance
AL001000014	Harris Homes	188	RAD/Section 18 Blend
AL001000016	North Birmingham Homes	271	RAD/Section 18 Blend
AL001000017	Cooper Green	227	RAD/Section 18 Blend
AL001000018	Ralph Kimbrough Homes	231	RAD/Section 18 Blend
AL001000023	Roosevelt City	118	RAD/Section 18 Blend
AL001000031	Park Place	87	RAD
AL001000032	Park Place II	85	RAD
AL001000033	Park Place III	68	RAD
AL001000034	Tuxedo	56	RAD
AL001000035	Tuxedo Terrace II	54	RAD
AL001000037	Glenbrook	50	RAD
AL001000040	Mason City I	6	Complete 5h Homeownership
AL001000042	Mason City III	8	Complete 5h Homeownership
AL001000043	Mason City IV	1	Complete 5h Homeownership
AL001000044	Tuxedo Terrace Phase I	9	Complete 5h Homeownership
AL001000045	Tuxedo Terrace Phase II	6	Complete 5h Homeownership
AL001000046	Tuxedo Terrace III	6	Complete 5h Homeownership

RAD PBVs RESIDENT RIGHTS AND PARTICIPATION

1. **No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility

and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR §983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058

HABD will utilize the Three-Year Phase-in:

- a. Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP.
- b. Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- c. Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Please Note: Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to

the HCV FSS program, subject to the following:

a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties. Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing. ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. Resident Participation and Funding. In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- i.** A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
- ii.** 14 days in the case of nonpayment of rent; and

iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.

- For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
- For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).

iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion

at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

RAD PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. Additional Monitoring Requirement. The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR§983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list

given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP). To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. **Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing

administrative fees for PBV RAD units. After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply

Attachment P

New Activities: Occupancy by Police Officers



ATTACHMENT P: OCCUPANCY BY POLICE OFFICERS**Statement on Police Units**

HABD does not have current plans for Police Officers to occupy any public housing units within the plan year. However, the PHA goal is to have 8 units assigned to officers which will be reflected in the agency's 5 year plan.

Attachment Q

New Activities: Project Based Voucher Program



REVISION PENDING - ATTACHEMENT Q: PROJECT BASED VOUCHERS**OTHER PROJECT BASED VOUCHERS**

During the Plan Year, HABD will implement a PBV Program to assist in the repositioning strategies. The PBVs will also be used for the current redevelopment of Southtown Court and at other properties to be identified as replacement units for other Public Housing lost under the repositioning strategies. HABD anticipates utilization of 203 PBV's at the Southtown Development and commitments for approximately 300 PBV's for other public housing redevelopment efforts.

Additionally, HABD will use PBVs to meet the goals and objectives of HABD's 5 Year Plan, including through issuance of a solicitation or award of PBVs based on previous competition.

Attachment R
New Activities: Units Proposed for HUD
Approved Vacancies – Undergoing
Modernization



REVISION PENDING Attachment R: Units Proposed for HUD Approved Vacancies – Undergoing Modernization

The Housing Authority of the Birmingham District (HABD) submitted Modernization Units located in multiple properties as identified on the attached charts.

Attachment S

New Activities: Other Capital Grant Programs



ATTACHMENT S: OTHER CAPITAL GRANT PROGRAMS

HABD will apply for HUD Capital Fund grants as they become available. HABD will also consider applying for grants to assist in the development of affordable housing, public safety, and social services.

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.

B.3 Progress Report

Below are statements regarding HABD's progress made towards meeting goals in the previous 5-Year Plan.

PHA Goal: Expand the supply of assisted housing

1. PENDING UPDATED INFORMATION

PHA Goal: Improve the quality of assisted housing

1. PENDING UPDATED INFORMATION

PHA Goal: Increase assisted housing choices

1. PENDING UPDATED INFORMATION

PHA Goal: Provide an improved living environment

1. PENDING UPDATED INFORMATION
2. The overall year to date criminal statistics for HABD are as follow:
 - a. Violent Crime is down negative: 31.2%
 - b. Property Crime is down negative 27.0%
 - c. Overall Crime is down negative 29.1%
3. walking to and from Hayes Elementary School (K-8).
4. report crimes and policy violations which led to drug bust, arrest, and corrective actions.
5. **Police Youth Talk.** Local contract police agency meets with youth to discuss various subjects to include, bulling, gun safety, drugs, domestic violence, and law violations.
6. **VAWA EMERGENCY TRANSFER PLAN.** The Violence Against Women Act (VAWA) was used to identify victims of domestic violence and provide assistance to clients in HABD communities. Eligible clients were transferred due to being victims of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L [MAY NEED UPDATED INFORMATION]
7. **Witness Relocation Agreement.** When a credible witness/resident was identified by the local contract law enforcement agency, a section 8 voucher is issued to relocated the witness. [MAY NEED UPDATED INFORMATION]

PHA Goal: Promote self-sufficiency and asset development of assisted households

1. [PENDING UPDATE]

PHA Goal: Ensure equal opportunity and affirmatively further fair housing

1. HABD continues to comply with Fair Housing Act regulations in an effort to provide non-discriminatory housing and community development programs
2. HABD employees attend Fair Housing training annually to ensure employees are knowledgeable of Fair Housing Act updates.
3. HABD continue to comply with the Fair Housing Act by increasing awareness to our residents and community partners with the various HUD conversion transformation programs
4. HABD's Fair Housing Policy and Procedures were updated in 2023, and will be supplemented with Standard Operating Procedures for practical daily use in 2024.
5. Fair Housing Working Group (FHWG) formed and "Kick-off" meeting convened on December 15, 2023.

PHA Goal: Take a leadership role in the creation of significant additional organizational capacity to provide and maintain quality affordable housing in Birmingham and the region.

1. Thrive

PHA Goal: Increase the public awareness of HABD's resources and programs that are offered to assist in improving the lives of residents

1. Multiple press releases issued about HABD resources and programming including, but not limited to, the Housing Choice Voucher Turkey Giveaway, the HABD/Publix/Shipt Thanksgiving Dinner Giveaway for Public Housing Residents, the awarding of the \$50M CNI grant, the hiring of a CHRO and VP of Strategic Initiatives, the opening of the one- and two-bedroom PH Waitlist, the groundbreaking of Southtown redevelopment, the establishment of the HCV (Section 8) Call Center, the Conversations over Pizzas initiative, the Selma Jubilee trip for HABD youth residents, the \$262,397 grant from the FCC to increase awareness of the Affordable Connectivity Program, and the election of new HABD Board leadership.
2. Sustained strong working relationships with local and regional news outlets and received media coverage of multiple events and programs, including but not limited to the Southtown redevelopment groundbreaking, Annual Employment and Career Fair, visit from Secretary Fudge to announce CNI Award, Conversations over Pizza, Security Upgrades at Todd Homes community, Southtown redevelopment progress, Magic City YouthBuild program, and the Public Housing Waitlist.
3. Issued weekly, recurring updates to all HABD staff and the Board of Commissioners through Constant Contact.
4. Held various all-staff team bonding events to improve morale and employee wellness, including a kick off to the Magic City Classic and Wellness Day at Railroad Park.
5. Sponsored and attended various partner events to support local scholarships and community service efforts, including but not limited to the HBCU Breakfast presented by Spire and the Birmingham Business Alliance, the MLK Jr. Unity Breakfast, the MLK

Day Drum Run Scholarship Fundraiser, and the Birmingham Civil Rights Institute founding celebration.

6. Created and distributed mid-year review newsletters to all public housing residents to keep them informed of HABD happenings.
7. Created and issued magnets to Housing Choice Voucher program participants to inform them of the newly implemented Section 8 Call Center.
8. Completed and implemented the newly designed HABD website to streamline information and resource access.
9. Increased social media presence, following and engagement and created a LinkedIn account for the agency to support business efforts and talent recruitment.
10. Created and placed an advertisement in the Birmingham Times Black History Month edition.
11. Procured new technology, like Adobe Creative Cloud, to improve content creation.
12. Expanded the internal Public Relations team by recruiting and hiring a Public Relations Coordinator.
13. Created and distributed an HABD brand guide to staff to ensure all materials from HABD, and to vendors for marketing materials, are of the same branding.
14. Coordinated partner, resident and planning meetings leading up to the interview and subsequent awarding for the \$50M Choice Neighborhoods Implementation grant.
15. Maintained a website specifically for the Smithfield Court Choice Neighborhoods grant awarding, SmithfieldChoice.org.
16. Attended/participated in various community events, programs and conferences to expand on best practices, engage new partners, and build on established relationships. Events and conferences include but are not limited to SERC-NAHRO, Operation Hope Global Forums Annual Meeting, National Urban League Conference, Congressional Black Caucus Foundation's annual Legislative Forum, PHADA Annual Legislative Forum, Prosper's Connection for Communications Professionals, Birmingham Business Hall of Fame Induction, and the Kiwanis Club of Birmingham weekly business luncheons.
17. Held *Demonstrating Leadership* forum for HABD leadership to meet with City of Birmingham leadership and learn more about the agency's best practices and structures.
18. Procured new marketing materials, including a modernized podium, with branding reflecting the new motto: Mission Focused, Service Driven.
19. Participated in the City of Birmingham's *Page Pals* initiative and the Kiwanis Club of Birmingham's *Kiwanis Reads* initiative to strengthen partnerships with the City and corporate partners through providing literacy support to third graders.

Leverage public/private partnerships to provide more resources and opportunities for our residents:

1. HABD and NCRC are in preliminary discussions to revisit prior relationship and construction of potentially 50-100 newly constructed homeownership units in the Tuxedo community.
2. HABD and Navigate Affordable Housing Partners continue to engage to explore production of affordable units in the Titusville community. Navigate's Live On First model includes a modular element to them which allows for a more aggressive timeline for units to be online and available for consumption. HABD currently has parcels in the footprint with Navigate that can support structures to

- allow for our goal of producing 500 units of affordable housing by 2029.
3. Choice Neighborhoods has provided an opportunity for HABD to deepen its relationship with the Department of Community Development. With this “interagency” partnership; HOME and CDBG dollars as well as parcels with the Land Bank Authority, HABD’s ability to leverage this relationship will yield the resources needed to create additional housing opportunities and options for our residents.
 4. Partner with Community Based Development corporations for expanding options
 5. Our department’s homeownership goal is to have all thirty-five (35) units of single family detached housing sold to eligible homebuyers in accordance with our existing 5 (h) Homeownership plan.
 6. Strategic Initiatives is engaged with local housing counseling agencies to begin the process of getting our program participants “mortgage ready”. This is accomplished by engagement with our HUD Approved counseling partner agencies such as Neighborhood Housing Services of Birmingham, Birmingham Urban League, Operation HOPE, and East Lake Initiative (ELI Thrive) to provide a qualifying First Time Homebuyer Class (8 hours) and individual counseling of the residents.
 7. Continue partnership with organizations such as Habitat for Humanity, East Lake Initiative, Woodlawn United, BUILDUP, Navigate, and BEAT Builds to provide options in geographic location for residents to have choices on where to purchase their homes.
 8. Homeownership Lease Purchase Facilitator is taking the HUD certification **exam** December 28, 2023. Her successful completion will lay the groundwork for HABD to become a fully accredited HUD approved counseling agency. This critical designation allows the agency to counsel our clients directly.
 9. Sunset existing 5(h) homeownership program and establish the HUD Industry standard Section 32 homeownership program.
 10. Strategic Initiatives has also re-engaged with local lenders who still participate through Public Housing Programs and Housing Choice Vouchers to ensure that potential homeowners have the needed financing to make the purchase (Bancorp/Cadence and Renasant Bank).
 11. Utilize existing parcels for redevelopment to support Thrive 2035 plan
 12. HABD has units in Fountain Heights, Mason City, and Tuxedo (Ensley) communities that are currently in use by tenants, some of which are interested in purchasing the unit they live in. HABD’s Homeownership program is based on a 5 (h) Lease-Home Ownership Program with the purpose of providing affordable home ownership opportunities for working class families. The program currently has an inventory of thirty-five (35) units to repurpose into homeownership.
 13. Develop additional 500 units of affordable multifamily and single family detached for rental options (Collegeville) as well as for families to purchase.
 14. Utilizing Policy Map software to identify communities where there are sufficient assets to invest in new construction/modular builds for consumption. Use of the software will create a grading system for deployment of resources that will drive

where HABD/Build99 will invest.

15. Increase participation from HCV and Public Housing residents
16. Exhaust existing pipeline of over 248 Public Housing Participants and 1500+ of HCV Homeownership participants by Q4 2027.
17. Homeownership Lease Purchase Facilitator is taking the HUD certification exam December 28, 2023. Her successful completion will lay the groundwork for HABD to become a fully accredited HUD approved counseling agency. This critical designation allows the agency to counsel our clients directly.
18. Increase capacity of Homeownership department to include 2 FTE Certified Counselors and .5 PTE Relocation/Housing Counselor by Q4 2024 – Q2 2025
19. Sunset existing 5(h) homeownership program and establish the HUD Industry standard Section 32 homeownership program.
20. Strategic Initiatives has also re-engaged with local lenders who still participate through Public Housing Programs and Housing Choice Vouchers to ensure that potential homeowners have the needed financing to make the purchase (Bancorp/Cadence and Renasant Bank).

B.4 Statement of Capital Improvements

REVISION PENDING - Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

Capital Fund Program - Five-Year Action Plan

Status: Submitted

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Housing Authority of the Birmingham District			Locality (City/County & State)			
PHA Number: AL001			<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No:)	
A.	Development Number and Name	Work Statement for Year 1 2022	Work Statement for Year 2 2023	Work Statement for Year 3 2024	Work Statement for Year 4 2025	Work Statement for Year 5 2026
	AUTHORITY-WIDE	\$5,577,810.00	\$3,600,000.00	\$3,150,000.00	\$2,550,000.00	\$2,100,000.00
	CHARLES P MARKS VILLAGE (AL001000006)	\$6,239,028.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	
	COLLEGEVILLE CENTER (AL001000013)	\$3,845,000.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	
	ELYTON VILLAGE (AL001000001)	\$25,000.00	\$1,400,000.00	\$1,400,000.00	\$100,000.00	
	TOM BROWN VILLAGE (AL001000010)	\$30,000.00	\$1,400,000.00	\$350,000.00	\$950,000.00	
	COOPER GREEN HOMES (AL001000017)	\$20,000.00				
	ROOSEVELT CITY (AL001000023)	\$6,000.00				
	SOUTHTOWN (AL001000004)	\$20,000.00				
	TUXEDO TERRACE/HOPE IV-PHASE I (AL001000034)	\$100,000.00				
	SMITHFIELD COURT (AL001000009)	\$200,000.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	

Capital Fund Program - Five-Year Action Plan

Status: Submitted

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Housing Authority of the Birmingham District		Locality (City/County & State)				
PHA Number: AL001		<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No:)		
A.	Development Number and Name	Work Statement for Year 1 2022	Work Statement for Year 2 2023	Work Statement for Year 3 2024	Work Statement for Year 4 2025	Work Statement for Year 5 2026
	REV. DR. MORRELL TODD COMMUNITY (AL001000011)		\$1,400,000.00	\$1,400,000.00	\$1,900,000.00	
	RUSSELL B HARRIS HOMES (AL001000014)					\$4,900,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$5,577,810.00
ID0128	Administration(Administration (1410)-Salaries)	Administration		\$1,606,283.00
ID0129	Operations(Operations (1406))	Operations		\$3,212,567.00
ID0189	Contract Administration Other Fees (Contract Administration (1480)-Other Fees and Costs)	Fees for Real Estate Advisory Consultant		\$258,960.00
ID0193	Contract Administration Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	Environmental Testing; CNA's; Surveys, Appraisals in preparation of repositioning multiple properties.		\$500,000.00
	CHARLES P MARKS VILLAGE (AL001000006)			\$6,239,028.00
ID0151	General Development Activity(Dwelling Unit - Conversion (1480))	Environmental clean up to reposition property under Section 18 and/or RAD.		\$5,939,028.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0197	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC units.		\$300,000.00
	COLLEGEVILLE CENTER (AL001000013)			\$3,845,000.00
ID0153	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$3,600,000.00
ID0184	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO detectors.		\$45,000.00
ID0195	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC		\$200,000.00
	ELYTON VILLAGE (AL001000001)			\$25,000.00
ID0183	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Installation of CO detectors		\$25,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	TOM BROWN VILLAGE (AL001000010)			\$30,000.00
ID0185	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$30,000.00
	COOPER GREEN HOMES (AL001000017)			\$20,000.00
ID0186	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$20,000.00
	ROOSEVELT CITY (AL001000023)			\$6,000.00
ID0187	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$6,000.00
	SOUTHTOWN (AL001000004)			\$20,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0188	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$20,000.00
	TUXEDO TERRACE/HOPE IV-PHASE I (AL001000034)			\$100,000.00
ID0194	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC Units		\$100,000.00
	SMITHFIELD COURT (AL001000009)			\$200,000.00
ID0196	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC		\$200,000.00
	Subtotal of Estimated Cost			\$16,062,838.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year				
	2	2023		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$3,600,000.00
ID0137	Administration(Administration (1410)-Salaries)	Administration		\$1,200,000.00
ID0138	Operations(Operations (1406))	Operations		\$2,400,000.00
	ELYTON VILLAGE (AL001000001)			\$1,400,000.00
ID0165	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	CHARLES P MARKS VILLAGE (AL001000006)			\$1,400,000.00
ID0166	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2023				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	SMITHFIELD COURT (AL001000009)			\$1,400,000.00
ID0167	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	COLLEGEVILLE CENTER (AL001000013)			\$1,400,000.00
ID0169	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	TOM BROWN VILLAGE (AL001000010)			\$1,400,000.00
ID0170	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	REV. DR. MORRELL TODD COMMUNITY (AL001000011)			\$1,400,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 3 2024				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	COLLEGEVILLE CENTER (AL001000013)			\$1,400,000.00
ID0172	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	SMITHFIELD COURT (AL001000009)			\$1,400,000.00
ID0174	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	CHARLES P MARKS VILLAGE (AL001000006)			\$1,400,000.00
ID0175	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	ELYTON VILLAGE (AL001000001)			\$1,400,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,100,000.00
ID0190	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$700,000.00
ID0191	Operations(Operations (1406))	Operations		\$1,400,000.00
	RUSSELL B HARRIS HOMES (AL001000014)			\$4,900,000.00
ID0192	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$4,900,000.00
	Subtotal of Estimated Cost			\$7,000,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1	2022
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,606,283.00
Operations(Operations (1406))	\$3,212,567.00
Contract Administration Other Fees (Contract Administration (1480)-Other Fees and Costs)	\$258,960.00
Contract Administration Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	\$500,000.00
Subtotal of Estimated Cost	\$5,577,810.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 2	2023
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,200,000.00
Operations(Operations (1406))	\$2,400,000.00
Subtotal of Estimated Cost	\$3,600,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 3	2024
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,050,000.00
Operations(Operations (1406))	\$2,100,000.00
Subtotal of Estimated Cost	\$3,150,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4	2025
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$850,000.00
Operations(Operations (1406))	\$1,700,000.00
Subtotal of Estimated Cost	\$2,550,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 5	2026
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$700,000.00
Operations(Operations (1406))	\$1,400,000.00
Subtotal of Estimated Cost	\$2,100,000.00

B.5 Most Recent Fiscal Year Audit



Recent results of PHA's fiscal year audit. This statement provides the results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the 1937 Act (42 U.S.C. 1437c(h)).

INDEPENDENT AUDITORS' REPORT

Board of Commissioners
Housing Authority of the Birmingham District
Birmingham, Alabama

Report on the Financial Statements

We have audited the accompanying financial statements of the business-type activities and the discretely presented component units of the Housing Authority of the Birmingham District (the Authority), as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the entity's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We did not audit the financial statements of the following component unit, which represents 100% of the respective assets, net position, and revenues of the discretely presented component unit. These statements were audited by other auditors whose reports have been furnished to us, and our opinion, insofar as it relates to the amounts included for the following discretely presented component unit and blended component unit is based solely on the reports of the other auditors

- Tuxedo Court Rental I, L.P.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Opinions

In our opinion, based on our audit and the report of the other auditors, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities and the discretely presented component unit of the Authority as of June 30, 2021, and the respective changes in financial position and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and the schedule of changes in the Authority's total OPEB liability and related ratios be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Authority's basic financial statements. The accompanying financial data schedules is presented for purposes of additional analysis and are not a required part of the basic financial statements. The schedule of expenditures of federal awards, as required by Title 2 U.S. Code

of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, is also presented for purposes of additional analysis and is not a required part of the basic financial statements.

The financial data schedules and the schedule of expenditures of federal awards are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated **REPORT DATE**, on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Authority's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.

CliftonLarsonAllen LLP

Lakeland, Florida
REPORT DATE

**HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT
MANAGEMENT'S DISCUSSION AND ANALYSIS
YEAR ENDED JUNE 30, 2021**

The Housing Authority of the Birmingham District (the Authority) was incorporated in 1935 and in 1937 began participation under the provisions of the United States Housing Act of 1937. As a public benefit corporation, the Authority provides subsidized public housing within the City of Birmingham, Alabama, in accordance with federal legislation.

A five-member Board of Commissioners governs the Authority. The Mayor appoints members of the governing board for staggered terms; they, in turn, elect a Chairperson and Vice Chairperson. The Board members also appoint a President/CEO to administer the affairs of the Authority.

The governing Board authorizes subsidy contracts with the U. S. Department of Housing and Urban Development (HUD) pursuant to the latter agency's regulations and statutory authorizations. One contract allows the Authority to construct, own and operate public housing facilities. A second contract allows the Authority to accommodate the leasing of housing from private owners and make it available to low-income families at rents they can afford. Other contracts authorize the Authority to make housing assistance payments for eligible individuals and families and to participate in mixed-financing transactions to construct market-rate units and assisted housing units within the same development.

As management of the Housing Authority of the Birmingham District (the Authority), we offer readers of the Authority's financial statements this narrative overview and analysis of the financial activities for the fiscal year ended June 30, 2021 with selected comparative information for the year ended June 30, 2020. Since the Management's Discussion and Analysis (MD&A) is designed to focus on the current year's activities, resulting changes and currently known facts, it should be read in conjunction with the financial statements and the notes thereto, which follow this section.

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**HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT
MANAGEMENT'S DISCUSSION AND ANALYSIS
YEAR ENDED JUNE 30, 2021**

The Financial Statements

The Authority's financial statements, reported on an entity-wide basis, are prepared in accordance with accounting principles generally accepted in the United States of America as promulgated by the *Government Accounting Standards Board* (GASB) principles. The financial statements are prepared on an accrual basis and reflect a special-purpose government engaged in a single business-type activity.

Statement of Net Position - This statement presents information on all of the Authority's assets and deferred outflows and liabilities and deferred inflows, with the difference between the two reported as net position. This statement provides information about the nature and the amounts of investments in resources (assets) and the obligations to Authority's creditors (liabilities). It provides one way to measure the financial health of the Authority by providing the basis for evaluating the capital structure of the Authority and assessing the liquidity and financial flexibility of the Authority. However, one will need to consider other non-financial factors such as changes in economic conditions, population and resident growth, and new or changed governmental legislation.

The statement, similar to a balance sheet, is presented in the format where "Assets" minus "Liabilities" equals "Net Position". Assets and liabilities are presented in order of liquidity. The focus of the "*Statement of Net Position*" is designed to represent the net available liquid (noncapital) assets, net of liabilities for the Authority. "Net Position" (formerly equity) may be reported in three broad categories:

- *Net Position, Invested in Capital Assets, Net of Related Debt*: This component of Net Position consists of all Capital Assets, reduced by the outstanding balances of any bond, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets
- *Restricted Net Position*: This component of Net Position consists of restricted assets, when constraints are placed on the asset by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.
- *Unrestricted Net Position*: This component consists of Net Position that does not meet the definition of the above two categories.

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**HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT
MANAGEMENT'S DISCUSSION AND ANALYSIS
YEAR ENDED JUNE 30, 2021**

Statement of Revenues, Expenses and Changes in Net Position - This statement presents information concerning the Authority's current year revenues and expenses. This statement, similar to an Operating Statement, reflects the Authority's income or loss for the period. Revenues and expenses are categorized as either operating or non-operating based upon definitions provided by GASB Statement Nos. 33 and 34. All changes in Net Position are reported as soon as the underlying event giving rise to the change occurs, regardless of when cash is received or paid. Thus, revenues and expenses are reported in this statement for some items that will result in cash inflows and cash outflows in future periods.

Statement of Cash Flows - This statement complements the accrual-basis financial statements and presents information showing the total cash receipts and cash disbursements of the Authority during the current fiscal year. The statement reports cash receipts, cash payments, and net changes in cash resulting from operations, noncapital financing, capital financing, and investing activities. This statement provides answers to such questions as where did cash come from, what was cash used for, and what was the change in the cash balance during the reporting period.

Notes to the Financial Statements - Notes to the Financial Statements provide additional information that is essential to a full understanding of the data provided. These notes give greater understanding on the overall activity of the Authority and how values are assigned to certain assets and liabilities and the longevity of these values. In addition, notes reflect the impact (if any) of any uncertainty the Authority may face.

In addition to the basic financial statements listed above, our report includes supplemental information. This information is to provide more detail on the Authority's various programs and the required information mandated by regulatory bodies that fund the Authority's various programs.

Authority Programs

The Authority consists exclusively of one enterprise fund utilizing the full accrual basis of accounting. An overview of the programs that comprise the fund maintained by the Authority follows:

Low-Rent Housing

The Authority rents units that it owns to low-to-moderate income households. This program operates under an Annual Contributions Contract (ACC) with HUD. HUD provides an annual Operating Subsidy to enable the Authority to provide the housing at a rent that is based upon 30% of household adjusted income.

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**HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT
MANAGEMENT'S DISCUSSION AND ANALYSIS
YEAR ENDED JUNE 30, 2021**

HOPE VI

The HOPE VI Program was developed as a result of recommendations by the National Commission on Severely Distressed Public Housing, which was charged with proposing a National Action Plan to eradicate severely distressed public housing. The Commission recommended revitalization in three general areas: physical improvements, management improvements, and social and community services to address resident needs. This program provides grants with unprecedented flexibility to address housing revitalization and community and supportive service needs.

The Authority has been awarded two HOPE VI grants: 1999 \$34 million for revitalization of Metropolitan Gardens; 2003 \$20 million for Tuxedo Court revitalization.

Capital Fund

This program provides annual formula-based funding to the Authority for capital and management activities, including modernization and development of public housing.

Housing Choice Vouchers

Under this Section 8 program, the Authority administers contracts with independent landlords who own property that may be leased by low-to-moderate income households. The Authority subsidizes the family's rent through a Housing Assistance Payment made to the landlord. The program is also administered under an ACC with HUD. HUD provides annual funding to enable the Authority to structure a lease that sets the participants' rent at 30% of household adjusted income.

Cares Act Supplemental Funding

The CARES Act provides for additional funding to "prevent, prepare for, and respond to coronavirus, including to provide additional funds for the Agency to maintain normal operations and take necessary actions during the period that the program is impacted by coronavirus.

Other Non-major Programs

Non-major programs are defined as programs that have assets, liabilities, revenues, or expenses that represent less than 5% of the Authority's total assets, liabilities, revenues or expenses.

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**HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT
MANAGEMENT'S DISCUSSION AND ANALYSIS
YEAR ENDED JUNE 30, 2021**

Financial Highlights

The number of residents served by the Low-Rent Housing and Housing Choice Voucher programs shaped the financial results of fiscal year 2021.

- The Authority's assets exceeded its liabilities at the close of the most recent fiscal year by approximately \$201.8 million (net position). Of this amount, approximately \$127.9 million (unrestricted net position) may be used to meet the Authority's ongoing obligations.
- The Authority's total net position increased by approximately \$12.0 million (370.52%). Net position was \$201.8 million and \$189.7 million for 2021 and 2020 respectively.
- Total operating revenue increased by approximately \$12.7 million (15.31%) during 2021. Total operating revenue for 2021 was \$96.4 million and for 2020 was \$83.6 million.
- The total operating expenses for all Authority programs increased by approximately \$3.7 million (4.31%). The total operating expenses for 2021 amounted to \$88.7 million and for 2020 were \$85.1 million.

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C.1 Resident Advisory Board (RAB) Comments



PENDING RAB MEETING IN FEBRUARY 2024 - Narrative to describe the analysis of the RAB recommendations and the decisions made on those recommendations.

C.2 Certification by State or Local Officials



PENDING NEW FORM TO BE SIGNED BY THE MAYOR - 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.

C.3 Civil Rights Certification



PENDING NEW FORM TO BE SIGN BY BOARD CHAIR AND CEO - Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan