



525 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104-4611
PHONE: (334)-206-7200 – FAX: (334)-206-7222 – WEBSITE: MHA TODAY.ORG

FYB 2020 PHA ANNUAL PLAN

A. PHA Information.

A.1 PHA Name: Montgomery Housing Authority PHA Code: AL006
 PHA Type: Standard PHA Troubled PHA
 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 04/2020
 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
 Number of Public Housing (PH) Units 1450 Number of Housing Choice Vouchers (HCVs) 3048 Total Combined Units/Vouchers
4498
 PHA Plan Submission Type: Annual Submission Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C 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.

The Montgomery Housing Authority (MHA) Annual Plan is provided for public view on our website www.mhatoday.org and at the following locations:

AMP NUMBER	PROPERTY NAME	PROPERTY ADDRESS
Main Office	MHA Central Office	525 S. Lawrence Street, Montgomery, AL 36104
AL006000002	Parks Place	1026 Rosa Parks Avenue Montgomery, AL 36108
AL006000004	Paterson Court	609 Winnie Street Montgomery, AL 36104
AL006000006	Gibbs Village East	1701 Terminal Road Montgomery, AL 36108
AL006000007	Gibbs Village West	2025 Terminal Road Montgomery, AL 36108
AL006000009	The Terrace	1301 Adams Avenue Montgomery, AL 36104
AL006000012	The Plaza at Centennial Hill I	515 Percy Drive Montgomery, AL 36104
AL006000013	The Plaza at Centennial Hill II	515 Percy Drive Montgomery, AL 36104
AL006000011	Victor Tulane Gardens	1101 Victor Tulane Cir, Montgomery AL 36104
AL006000014	Columbus Square I	645 Columbus Street Montgomery, AL 36104
AL006000015	Columbus Square II	645 Columbus Street Montgomery, AL 36104

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

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:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

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

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

1. Statement of Housing Needs and Strategy for Addressing Housing Needs

MHA used information available through the U.S. Census, Comprehensive Housing Affordability Strategy (CHAS), the American Community Survey 5-Year Estimates, and other data available to the MHA, to complete the matrix below. MHA serves households with an income less than or equal to 30 percent of the Area Median Income (AMI) of the City of Montgomery. In the City, 14,080 households have an income less than or equal to 30 percent AMI. The need is further established by the number of households on the MHA combined waiting lists for Public Housing, HCV and Tenant-Based assistance, 8,024.

Housing Needs of Families in the Jurisdiction by Family type

Income Level	Number of Households
Household Income <=30% of AMI	14,080
Household Income >30 to <=50% AMI	10,500
Household Income >50% but <80% of AMI	13,140

Source: U.S. Census data: The Comprehensive Housing Affordability Strategy ("CHAS") dataset

Population	199,525
Households	78,217

Source: 2017 American Community Survey, Demographic and Housing Estimates

Median HH Income	\$42,419
Mean HH Income	\$60,139
Poverty Rate – Family	18%
Poverty Rate – Individual	29.3%
Vacancy Overall	15.6%
Vacancy Homeowner	(X)
Vacancy Renter	(X)
Median Home Value	\$119,500
Median Rent	\$827

MHA's Combined Waiting Lists data indicates that the greatest housing need in the City of Montgomery, AL, is among extremely low-income families with children. Of the combined 9,995 households on the waiting list, 9,592 are extremely low income and 5,507 are households with children that lack adequate housing. MHA plans to address this need strategically through our redevelopment efforts. Partnering with the City of Montgomery and the State of Alabama Housing Finance Agency, MHA will strive to leverage private equity funding, to undertake the construction of housing that includes two and three-bedroom units that are affordable to extremely low-income households with children. These mixed income communities will be marketed through traditional publications, as well as through supportive services partnerships. Through these efforts, MHA will increase the number of affordable housing units throughout the Montgomery market, and present mixed finance developments as viable options for extremely low-income families seeking housing.

Housing Needs of Families on the Combined Waiting Lists

	Public Housing # of Families	HCV # of Families	Public Housing % of total Families	HCV % of total Families	PBV # Families	PBV % of total Families	Total HCV Families
Waiting List Total	7828	938		32%	32%	68%	2957
Extremely low income (<=30% AMI)	7691	859	98.2%	91%	91%	93%	
Very low income (>30% but <=50% AMI)	111	13	1.4%	1.2%	1.2%	4.7%	
Low income (>50% but <80% AMI)	26	1	.3%	.1%	1%	7%	
Families with children	4729	582	60.4%	62.1%	62.1%	65.8%	
Elderly families	132	27	1.7%	2.9%	2.9%	1.7%	
Families with Disabilities	1213	131	15.5%	14%	14%	16.6%	
Race/ethnicity (White)	452	18	5.8%	1.9%	1.9%	7.2%	
Race/ethnicity (Black)	6771	887	86.5%	94.6%	94.6%	92.5%	
Race/ethnicity (Asian/Other)	143	6	1.8%	0.6%	0.6%	1.1%	
Race/ethnicity (Hispanic)	158	14	2%	1.5%	1.5%	2.1%	

2. Financial Resources

The table below lists the Montgomery Housing Authority's most current anticipated financial resources for the upcoming year, such as PHA Operating, Capital and other anticipated Federal resources available to the Authority, as well as tenant rents and other income available to support Public Housing (PH) and Housing Choice Voucher (HCV). The 2019 and earlier Capital Fund amounts are the unobligated amounts as of 7/31/2019.

HUD has not determined the 2020 funding levels. Values below are based on 2019 projected actual and are a reasonable estimate for 2020.

Funding Source	Amount	Use
<i>Federal Grants:</i>		
Public Housing Operating Subsidy (88% HUD proration)	\$ 4,666,718	PH Operations
Public Housing Capital Fund Program-2020 (estimate)	\$3,930,806	PH Capital Improvement
Section 8 Housing Choice Voucher Tenant Based Assistance HAP (99% HUD proration)	\$19,802,194	HCV - HAP
Section 8 Housing Choice Voucher Tenant Based Assistance Admin Fee (88% HUD proration)	\$1,740,000	HCV - Administration
ROSS Grants	\$ 267,722	HCV/PH FSS Coordinator
<i>Prior Year Federal Grants (Unobligated Funds Only):</i>		
Public Housing Capital Fund Program-2018	\$ 4,029,755	PH Capital Improvement
Public Housing Capital Fund Program-2019	\$ 3,930,806	PH Capital Improvement
<i>Other Sources:</i>		
Public Housing Dwelling Rental Income	\$ 1,640,820	PH Operations
Public Housing Other Tenant Charges & Misc. Income	\$ 124,920	PH Operations
Total	\$ 40,133,741	

3. Operations and Management

MHA has in the past year or intends in the upcoming year to revise the following items contained with its Housing Choice Voucher Administrative Plan as noted below:

- Update language in Section 3-1 M. to approve family members as live-in aides;
- Update language in Section 4-11. C. to require MHA website and social media as publishing outlets for notification of re-opening waiting list;
- Update language in Section 5-II.B. to remove age requirement of bedroom size for children of opposite sex;
- Update language in Section 5-II.E. to include the initial term of a voucher and criteria for extensions;
- Update language in Section 11-1. D. to eliminate the preference of conducting face-to-face re-examinations;
- Update language in Section 11-11. B. to change reporting of interim changes from 30 days to 10 days; and
- Update language in Section 8-11. A. to allow minimum cost to landlords for re-inspections under certain circumstances.

4. Community Service and Self-Sufficiency Programs

In addition to the Family Self-Sufficiency Program (FSS) that is available to public housing and housing choice voucher participants, MHA now offers the Resident Opportunities for Self-Sufficiency Program (ROSS) for all public housing residents. The ROSS program enables participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency, or help improve living conditions.

5. Significant Amendment/Modification

MHA defines "significant amendment or modification" as changes to its plans or policies which fundamentally alter the mission, goals or objectives of the Agency including; changes to the rent or admissions policies or organization of the waiting lists; additions of non-emergency work items or changes in use of replacement reserve funds under the Capital Fund; additions of new activities not included in the current Plan; and any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Substantial deviation/modification shall include any change in the planned or actual use of federal funds for activities that would prohibit or redirect MHA's mission to create affordable, sustainable housing while improving the quality of life for families and encouraging independence; and any single or cumulative

annual change in the planned or actual use of federal funds as identified in the 5-Year Plan that exceeds 20% of MHA's annual program budgets for HCV (Section 8), Public Housing or Development activities. Examples include: the need to respond immediately to Acts of God or unforeseeable significant events beyond the control of the Housing Authority. Also included are mandates from local government officials, and/or the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.

Any revision to MHA plans and/or policies adopted or implemented, as the result of a Presidential Order, Congressional appropriation or legislation, HUD revision to any program regulation governing our programs or funding streams, or editorial changes such as additional detailed language provided for clarification of activities will not be considered a significant amendment or modification to the 5-Year Plan.

In addition, in preparation for the newly contemplated Rental Assistance Demonstration (RAD), MHA is excluding from the PHA Plan the following RAD-specific items

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced because of any approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for any approved RAD conversion; and
- d. Changes to the financing structure for any approved RAD conversion.

Changes made to the Plan, or any component thereof, that do not relate to the above-mentioned definition will not be considered "substantial" or "significant" and will not require public notice or comment.

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

If subject to deconcentration requirements, MHA or Mixed-Finance Owner will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve MHA or Mixed-Finance Owner's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.

B.2 New Activities.

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

Y N

- Hope VI or Choice Neighborhoods. (see item #1 below)
- Mixed Finance Modernization or Development. (see item #2 below)
- Demolition and/or Disposition. (see item #3 below)
- 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. (see item #6 below)
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers. (see item #4 below)
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (see item #5 below)

(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.

1. Hope VI or Choice Neighborhoods

MHA intends to explore all potential grant opportunities in the upcoming year for Choice Neighborhood Planning and Implement grants, as well as Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) funding and public and private funding sources as appropriate.

2. Mixed-Finance Modernization or Development

MHA's Modernization efforts will be focused on implementing a comprehensive site and dwelling maintenance improvement plan for all outstanding capital needs and ongoing maintenance concerns.

MHA expects to self-develop the Plaza at Centennial Hill Phase 3 in the upcoming year utilizing MHA eligible resources, including Capital Funds and/or operating reserves through a RAD transaction to complete the redevelopment of the former Tulane Courts Public Housing site.

One of MHA's developer partners was awarded 9% tax credits in 2017 for Columbus Square Phase II. The project is expected to be completed in 2019. In the upcoming year, MHA intends to execute a Development Rights Agreement with a new developer partner, revisit the master site planning component for the remainder of the site, and submit another 9% tax credit application for Columbus Square Phase III in 2021.

MHA will partner with other non-profit and for-profit developers as appropriate to develop strategies and increase the number of affordable units in MHA's portfolio. MHA will focus on poverty de-concentration by seeking to develop mixed income housing in communities with desirable amenities. MHA may establish an Acquisition Infill program to build infill housing to stabilize key neighborhoods, especially in low impact areas, to aid in the de-concentration of poverty.

	<p>MHA will also explore off-site acquisition opportunities in the upcoming year to replace units lost due to the pending demolition at Smiley Court.</p> <p>Further, MHA intends to engage community stakeholders in the upcoming year to formulate a comprehensive re-development strategy for Patterson Court.</p> <p>MHA may also elect to explore opportunities under its non-profit affiliate to leverage funding opportunities such as HOME, CDBG, and other sources.</p> <p>3. Demolition or Disposition</p> <p>Smiley Court demolition activities are expected to commence in 2019. MHA further intends to amend the HUD approved demolition letter for Smiley Court to allow for RAD transfer of assistance for units which were vacant at the time the demolition application was initially approved by HUD. MHA may opt to seek HUD approval for the demolition/disposition of Paterson Courts.</p> <p>MHA continues to seek out potential interested buyers for the former Cedar Park public housing site at Fair Market Value and/or a land swap as may be approved by HUD.</p> <p>4. Project-Based Vouchers</p> <p>Consider expansion of PBV program in privately owned properties. Other efforts, to increase the supply of affordable housing in Montgomery, include reviewing PBVs under the Housing Choice Voucher program, in conjunction with property acquisitions and new construction efforts. These efforts may also include joint partnerships with the private sector, to the extent such partnerships would benefit the MHA and create additional revenue streams for the agency. In the upcoming year MHA intends to issue an RFP for Project-Based Vouchers.</p> <p>5. Other Capital Grant Programs</p> <p>MHA will apply for Emergency Safety and Security Grants as may become available. Security concerns remain a top priority for MHA and the residents.</p> <p>6. Conversion of Public Housing to Project-Based Assistance under RAD</p> <p>MHA intends to apply convert to RAD the units at Smiley Court that were vacant at the time of the HUD demolition application approval and not eligible for tenant protection vouchers. Under this approach, MHA maintain the RAD units in its affordable housing portfolio. MHA intends to utilize the RAD vouchers at Columbus Square, Plaza Centennial Hill and additional off-site locations. MHA expects to apply for 147 units. MHA anticipates issuing an RFP in the upcoming year for the RAD transfer of assistance not utilized at Columbus Square, Plaza Centennial Hill.</p> <p>MHA anticipates exploring RAD for the ACC units in the mixed-finance developments at The Plaza at Centennial Hill Phase I and Phase II.</p> <p>MHA is not under any voluntary compliance agreement, other order or decree, or judicial or administrative ruling or decision. MHA certifies that the RAD application and conversion process will comply with all applicable site selection and neighborhood review standards, and that we will follow all appropriate procedures. MHA recognizes that HUD's total development cost limits apply to RAD acquisition/rehabilitation and new construction developments. Assuming development of 147 units, the maximum projected RAD-eligible funds (including capital funds and operating reserves) would be approximately \$30,000,000.</p>
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
B.5	<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.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>

B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>MHA's most recent 5-Year Action Plan (HUD-50075.2) was approved by HUD on [insert date].</p>



525 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104-4611
PHONE: (334)-206-7200 – FAX: (334)-206-7222 – WEBSITE: MHA TODAY.ORG

FYB 2020 PHA 5-YEAR PLAN

A. PHA Information.

A.1 PHA Name: Montgomery Housing Authority **PHA Code:** AL006

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 04/2020

PHA Plan Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The Montgomery Housing Authority (MHA) Annual Plan is provided for public view on our website www.mhatoday.org and at the following locations:

AMP NUMBER	PROPERTY NAME	PROPERTY ADDRESS
Main Office	MHA Central Office	525 S. Lawrence Street, Montgomery, AL 36104
AL006000002	Parks Place	1026 Rosa Parks Avenue Montgomery, AL 36108
AL006000004	Paterson Court	609 Winnie Street Montgomery, AL 36104
AL006000006	Gibbs Village East	1701 Terminal Road Montgomery, AL 36108
AL006000007	Gibbs Village West	2025 Terminal Road Montgomery, AL 36108
AL006000009	The Terrace	1301 Adams Avenue Montgomery, AL 36104
AL006000012	The Plaza at Centennial Hill I	515 Percy Drive Montgomery, AL 36104
AL006000013	The Plaza at Centennial Hill II	515 Percy Drive Montgomery, AL 36104
AL006000011	Victor Tulane Gardens	1101 Victor Tulane Cir, Montgomery AL 36104
AL006000014	Columbus Square I	645 Columbus Street Montgomery, AL 36104
AL006000015	Columbus Square II	645 Columbus Street Montgomery, AL 36104

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

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:					

B.	5-Year Plan. Required for all PHAs completing this form.
B.1	<p>Mission. State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA’s jurisdiction for the next five years. Mission. State the PHA’s mission for serving the needs of low- income, very low- income, and extremely low-income families in the MHA’s jurisdiction for the next five years.</p> <p>The mission of the Montgomery Housing Authority (MHA) is to create affordable, sustainable housing while improving the quality of life for families and encouraging independence.</p> <p>In order to achieve this mission, the MHA will:</p> <ol style="list-style-type: none"> 1. Neighborhood Transformation <p>Build partnerships for substantive community redevelopment by increasing the knowledge base and development acumen of community partners to achieve the critical capacity necessary to generate increased investment in quality affordable housing through acquisition, rehabilitation, in-fill development, and asset repositioning. Lead as a bridgebuilder between community stakeholders, private developers, financial institutions and governmental agencies. Outcomes: (a) submit a 9% low-income tax credit application in early 2020 for Columbus Square Phase III; (b) seek design build partners to allow MHA to self-develop the remaining portion of The Plaza at Centennial Hill Phase III; (c) incorporate the former Lister Hill clinic and other adjacent parcels under HUD’s site acquisition process to further enhance the recently re-developed sites at The Plaza at Centennial Hill and/or Columbus Square; (d) create community space for the residents at Parks Place to include a playground/amenity space; (e) demolish Smiley Courts and reposition through acquisition/rehabilitation and/or RAD transfer of assistance at off-site locations; (f) plan for the repositioning of Paterson Court through possible Choice Neighborhoods Initiative (CNI) Planning Grant ; new development using LIHTC (and any proceeds) and rental assistance demonstration (RAD), where appropriate; (g) implement the plan for offsite lease/purchase through developing new infill housing; (h) submit a RAD application for a portion of the units at Smiley Court and explore opportunities to utilize RAD transfer of assistance in on-going development efforts; and (i) explore opportunities to submit additional RAD applications for other ACC units as may be in the best interest of MHA.</p> 2. Create Administrative Efficiency while Enhancing the Customer Experience <p>Maximize existing technology to create touchless access points and improve ease of use for both external and internal customers. Create staff efficiency around processing by reducing the number of interactions necessary to gather information and complete transactions with landlords, tenants and development partners. Outcomes: (a) reduce redundancies and re-work; (b) create reliability by strengthening the critical business pathways improving resident access when placing service requests, receiving official letters/documents and paying rent/other charges; (c) and, implement remote re-certifications.</p> 3. Promote Fair Housing and De-concentration <p>Use redevelopment activities as an opportunity to expand MHA’s portfolio across the Montgomery metropolitan area and continue to promote poverty de-concentration efforts in compliance with prevailing laws. Encourage mobility of voucher holders into areas with greater economic opportunities and amenities, through housing programs and redevelopment activities. Outcomes: (a) work with City and County leadership to encourage changes to local city ordinances and policies to promote inclusionary zoning, requiring new multi-family developers to earmark a percentage of dwellings for low-income families - inclusionary zoning; (b) acquire suitable land in non-impacted census tracts and hold for future development; (c) increase the marketing of MHA programs to target underrepresented families in both the Housing Choice Voucher and Public Housing programs .</p> 4. Economic Self-Sufficiency Opportunities <p>Create resident training programs that promote economic independence, through practical skills development and small business start-up training. Create workforce and business development training opportunities for residents to learn administrative, painting and maintenance trades at MHA properties. Build partnerships with employment and training to support a direct pathway for resident enrollment in local colleges and technical schools. Outcomes: (a) placements to employers who rely on local workforce; (b) increase the number of families participating in the Housing Choice Voucher home-ownership and Public Housing home-ownership program; (c) increase the number of MHA residents participating in section 3 for MHA sponsored construction activities; (d) establish relationships with banks who will offer incentivized savings programs and mortgage loans.</p> 5. Expand and Improve Affordable Housing <p>Create and take advantage of opportunities to leverage resources to build, acquire/renovate and rehabilitate new affordable housing. Outcomes: (a) submit a tax credit application for Columbus Square Phase III; (b) self-develop the remaining portion of The Plaza at Centennial Hill Phase III; (c) reposition Paterson Court using proceeds from sale; low income housing tax credits and capital/operating reserves; (d) demolish Smiley Court and convert assistance to RAD for a portion of the Smiley Court units that were vacant and utilize RAD transfer of assistance in MHA’s on-going development efforts; (e) advertise for PBV and/or RAD vouchers to partner with other developers building affordable housing; (f) use MHA’s non-profit instrumentality as a vehicle for redevelopment; and (g) explore mixed-use models for future development.</p> 6. Transformation and Rebranding of MHA properties as safe and valuable assets to the City <p>Develop multi-media rebranding message to promote positive attributes, amenities, and public benefit of MHA housing programs and development activities. Outcomes: (a) rebranding and messaging including an annual marketing document; (b) expand communication reach for initiatives and positive messaging through modern tech-comm vehicles including Instagram, Facebook and twitter; (c) participate in local apartment associations and neighborhood association meetings; (d) improved public image; (e) expand partnerships and create signature programs.</p>

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low-income, and extremely low- income families for the next five years.

IMPROVE PUBLIC HOUSING & HCV OPERATIONS

1. Achieve "High Performer" rating under the PHAS and SEMAP (or HUD equivalent) program.
2. Improve the quality of life of residents in all communities:
 - Upgrade curb appeal to all properties and, improve common areas
 - Install additional security and safety measures dwelling units' interiors and exteriors
 - Partner with the Montgomery Police Department to increase public patrols and to conduct periodic patrols for safety
3. Improve customer service and communication between residents and applicants and landlords.
4. Utilize the established asset management protocol to routinely measure performance in management indicators at mixed finance developments.
5. Develop and implement an affirmative marketing plan to reach out to under-represented groups.
6. Decrease crime in all public housing communities.
7. Streamline business processes, to create effective and/or efficient program administration:
 - Adopt policies that will allow two-year re-certifications, for families on fixed income
8. Develop translate marketing material in languages, as needed:
 - Provide printed documents in Spanish

Create and promote economic self-sufficiency opportunities through Homeownership programs and community partnerships.

IMPROVE PROCUREMENT OPERATIONS

- Automate and streamline procurement/contract processes, to include a qualified vendor listing of pre-negotiated prices for trades services
- Improve minority participation involvement in trade service workshops
- Implement E-Procurement and work with companies to increase participation
- Increase Section 3 participation

AUGMENT INFORMATION TECHNOLOGY AGENCY WIDE

- Improve application of new technology internal and external
- Ingrate the information technology platform across all departments

HUMAN RESOURCES

- Continue to standardize human resources management practices in the areas of hiring, retention, employee development, benefits, testing, and compliance with federal, state and local regulations
- Develop a strategy to promote workplace diversity

EXPAND AND ADVANCE REAL ESTATE ACTIVITIES TO IMPROVE HOUSING INVENTORY

Reposition assets to create viable and sustainable communities by leveraging resources and building partnerships:

- Redesign the site plan for the final phase of Columbus Square
- Engage residents, an urban planning firm and other community stakeholders to formulate a comprehensive redevelopment strategy for Paterson Court
- Seek opportunities to acquire and develop replacement housing for demolished units
- Partner with other non-profit and for-profit developers to increase the number of affordable units across the community
- Re-master plan and self-develop Phase III of the Plaza at Centennial Hill
- Demolish unsafe structures at Smiley and redevelop off-site

Strategic Financial Planning for Organizational Stability:

- Implement a comprehensive funding strategy to increase resources by pursuing Choice Neighborhood Planning and Implementation grants, Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) funding, and other public and private funding opportunities that may arise
- Use non-profit subsidiary instrumentalities as vehicles to take advantage of funding opportunities such as HOME Investment Partnership, CDBG services, and other opportunities that may come available

Implement a Rental Assistance Demonstration Initiative:

- Use RAD as tool to expand access to quality housing
- Develop new housing that will include RAD units
- Promote RAD as an opportunity for gap financing for other affordable housing developers
- Amend existing Smiley Courts Demolition Approval to accommodate RAD transfer of assistance

****See attachment for RAD Overview***

Eliminate Blight and augment current redevelopment or renovation projects:

- Acquire adjacent properties in project areas for redevelopment through new construction, rehabilitation or demolition
- Provide space to accommodate additional amenities (i.e., parking, Pre-K classrooms, playgrounds and employment training activities)

Repair, Renovate or Modernize Public Housing Units:

- Implement a comprehensive site and dwelling maintenance improvement plan for all MHA developments to extend the viability of the assets

	<p>Ensure all properties and dwelling units (where applicable) comply with governing accessibility standards:</p> <ul style="list-style-type: none"> ➤ Develop five-year plan to ensure designated units comply with the 504 accessibility requirements <p>PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS</p> <ul style="list-style-type: none"> ➤ Increase program interest, by including information in the new admission and transfer briefings, by organizing FSS orientations at public housing community centers <p>Increase partnerships with service providers:</p> <p><u>Equal Opportunity and Affirmatively Further Fair Housing Statement</u></p> <p>The Montgomery Housing Authority affirmatively furthers Fair Housing, in the administration of its programs, by complying fully with all Federal, State and local nondiscrimination laws and administering programs, in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing and marketing its program to members of protected classes who are “least likely to apply”.</p> <p>The Authority shall not discriminate against any applicant, participant, or landlord because of race, color, national or ethnic origin or ancestry, religion, sex, age, familial status, marital status, parental status, sexual orientation, military status or disability.</p> <p>This is a fundamental policy of the MHA, as it is committed to due diligence, in assuring equal housing opportunities and non-discrimination in all aspects of its housing activities. MHA has embraced an ethical, as well as the legal, imperative to aggressively ensure that MHA's housing programs comply fully with all local, state and federal fair housing laws including, the Fair Housing Act of 1968, as amended (Fair Housing Act) and its implementing regulations. Additionally, the MHA is implementing special initiatives to affirmatively further fair housing, as required by Section 808(c)(5) of the Fair Housing Act. These efforts to affirmatively further fair housing include: promoting the de-concentration of poverty; income-mixing; and opportunities for families to live in the various, diverse communities throughout the City of Montgomery.</p>
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.</p> <p>MHA will continue to comply with all requirements of HUD's VAWA and its amendments. Public Housing residents are briefed on the VAWA Policy and Lease Addendum at the time of lease-up. MHA will refer Public Housing residents impacted by VAWA to the local Sunshine Center for counseling assistance and will seek additional community partnerships to provide services to the families affected by domestic violence.</p>

B.5

Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

DEFINITION OF “SIGNIFICANT AMENDMENT OR MODIFICATION”

MHA defines “significant amendment or modification” as changes to its plans or policies which fundamentally alter the mission, goals or objectives of the Agency including; changes to the rent or admissions policies or organization of the waiting lists; additions of non-emergency work items or changes in use of replacement reserve funds under the Capital Fund; additions of new activities not included in the current Plan; and any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Substantial deviation/modification shall include any change in the planned or actual use of federal funds for activities that would prohibit or redirect MHA’s mission to create affordable, sustainable housing while improving the quality of life for families and encouraging independence; and any single or cumulative annual change in the planned or actual use of federal funds as identified in the 5-Year Plan that exceeds 20% of MHA’s annual program budgets for HCV (Section 8), Public Housing or Development activities. Examples include: the need to respond immediately to Acts of God or unforeseeable significant events beyond the control of the Housing Authority. Also included are mandates from local government officials, and/or the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.

Any revision to MHA plans and/or policies adopted or implemented, as the result of a Presidential Order, Congressional appropriation or legislation, HUD revision to any program regulation governing our programs or funding streams, or editorial changes such as additional detailed language provided for clarification of activities will not be considered a significant amendment or modification to the 5-Year Plan.

In addition, in preparation for the newly contemplated Rental Assistance Demonstration (RAD) program, the definition of a substantial deviation from the agency’s annual plan will exclude the following RAD-specific items, provided that the RAD plans are authorized by MHA’s Board of Directors in the normal course of business.

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced because of any approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for any approved RAD conversion;
- d. Changes to the financing structure for any approved RAD conversion;
- e. The date the significant amendment is submitted to the PHA Plan website; and
- f. Decisions to dedicate a portion of the agency’s existing capital funds budget and/or public housing reserve as a source of funds for proposes of a RAD conversion and recapitalization transaction.

Changes made to the Plan, or any component thereof, that do not relate to the above-mentioned definition will not be considered “substantial” or “significant” and will not require public notice or comment.

The following information follows the Significant Plan Amendment detail required in HUD Notice H-2019-09 PIH-2019-23 (HA), The Rental Assistance Demonstration – Final Implementation, Revision 4.

1. A description of the units to be converted, including: a) the number of units, b) the bedroom distribution of units, and c) the type of units (e.g., family, elderly/disabled, or elderly-only);

RAD Overview

On January 24, 2018, MHA received approval from HUD to demolish all remaining buildings at Smiley Court, consisting of 284 dwelling units and 2 non-dwelling buildings, due in part to extreme foundation failure that rendered the units as uninhabitable and obsolete. MHA subsequently applied to HUD for Tenant Protection Vouchers and received 137 TPVs for relocation purposes. All residents have been relocated from Smiley Courts.

MHA is in a position to apply for additional HUD rental assistance under RAD for the previously vacant units at Smiley Court that did not previously receive TPVs.

MHA has decided that RAD transfer of assistance will be financially beneficial to MHA.

MHA will use RAD transfer of assistance at the following sites: 1) Plaza Centennial Hill Phase 3 (PCH3); 2) Columbus Square Phase 3 (COLSQ3); and 3) additional offsite parcels to be identified.

PCH3 site boundaries are roughly Centennial Circle to the west, Hall Street to the east, King Cole Drive, Adams Avenue to the north and King Cole Drive to the south. The PCH3 census tract is 56.04.

COLSQ3 site boundaries are North Bainbridge Street, North Ripley Street, Randolph Way + Pollard Street, and the railroad tracks. The COLSQ3 census tract 33.01.

The additional offsite parcels are still to be identified. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

Units

MHA is submitting a RAD application for converting 147 of the units at Smiley Courts through RAD and transferring that assistance to new construction at the following sites: 1) Plaza Centennial Hill Phase 3 (PCH3); 2) Columbus Square Phase 3 (COLSQ3); and 3) additional offsite parcels. The additional offsite parcels are still to be identified. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

Bedroom Distribution of Units

PCH3 will include approximately 27 units, including 27 three-bedroom units.

COLSQ3 will include approximately 50 units, including 15 one-bedroom units, 20 two-bedroom units, and 15 three-bedroom units.

The additional offsite parcels are anticipated to include 70 units, including 20 1BR units, 30 2BR units, 20 3BR units.

Type of Units

PCH3 will include 27 multifamily rental units.

COLSQ3 will include 50 multifamily rental units.

MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels. So it is not known whether the units will be multifamily or elderly/disabled.

2. Any change in the number of units that is proposed as part of the conversion, including: a) de minimis unit reductions; b) unit reductions that are exempt from the de minimis cap; c) change in bedroom distribution

RAD Change in Number of Units

A change of units is not needed for the RAD transfer of assistance. MHA has received demolition approval for all 284 units at Smiley. MHA is seeking RAD transfer of assistance for PCH3, COLSQ3 and additional offsite parcels. After HUD approval of RAD application / receipt of CHAP, MHA will seek amended demolition approval from the HUD Special Applications Center. MHA will demolish the Smiley units that are not subject to the RAD transfer of assistance conversion.

3. Any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted. This includes any waiting list preferences that will be adopted for the converted project.

a. If Converting to PBV: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.6, Attachment 1B of this Notice and the Joint Housing/PIH Notice H-2014-09/PIH-2014-17.

Changes in Tenant Protections, Admission, Selection, Occupancy

As noted previously, all units at Smiley were approved for demolition under Section 18. All residents have been relocated from Smiley Courts under the relocation plan approved in connection with the demolition application.

Since Smiley Courts is vacant, and there are no existing residents, MHA will institute the provisions below for new RAD residents at PCH3, COLSQ3 and additional offsite parcels.

Project Based Voucher Requirements (Section 1.6 of PIH Notice 2019-23, REV-3 and Notice H 2016-17; PIH 2016-17)
Tenant Protections Under Section 1.6.C (PBV)
5. Resident Participation and Funding
6. Termination notification
7. Grievance process
Tenant Protections Under Section 1.6.D (PBV)
1. Establishment of Waiting List
2. Choice Mobility

Tenant Protections Under Section 1.6 C

5. Resident Participation and Funding. Residents RAD PBV 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. To facilitate the uniform treatment of residents and units at a Covered RAD Project, any non-RAD PBV units located in the same Covered RAD Project shall be subject to the terms of this provision.

6. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate.

a. Termination Notification. HUD is incorporating additional termination requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the same Covered RAD Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
 - 1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - 2. In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. Not less than 14 days in the case of nonpayment of rent; and
- iii. Not less than 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. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v), 40 an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project 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.

1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).

2. For any additional hearings required under RAD, the Project Owner will perform the hearing.

ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.

iii. The Project Owner gives 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 Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered RAD Project shall be subject to the terms of this provision.

Tenant Protections Under Section 1.6 D

1. Establishment of Waiting List. 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered RAD Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

a. Transferring an existing site-based waiting list to a new site-based waiting list.

b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.

c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.

d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 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 Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. 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. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁴³

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

2. Choice-Mobility. One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use

tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

4. If there will be a transfer of assistance at the time of conversion, the significant amendment must include: a) the location to where the assistance is being transferred; b) the number of units to be transferred; c) the bedroom distribution of the units in the new building(s); and d) the type of units, if changed (e.g. family, elderly/disabled); and e) any reduction or change in the number of units and what reduction category the fall under (i.e. de minimis); f) how the waiting list will be transferred and how households will be selected for the transfer, where applicable; g) what the PHA plans to do with the original site following the transfer of assistance, consistent with allowable uses described in RAD Section 1.4.A.12.

a) Transfer of Assistance: Overview

This RAD transfer of assistance application for Smiley Courts is somewhat unique, since all units were approved for demolition under Section 18, and all residents have been relocated from Smiley Courts under the relocation plan approved in connection with the demolition application.

Assistance will be transferred to PCH3, COLSQ3, and additional offsite parcels are still to be identified. The location for PCH3 and COLSQ3 is included in Section 1 of this Amendment. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

b) Transfer of Assistance: Units

The total units to be transferred from Smiley is 147 units.

c) Transfer of Assistance: Bedroom Distribution + Unit Type

PCH3 will include approximately 27 units, including 27 three-bedroom units.

COLSQ3 will include approximately 50 units, including 15 one-bedroom units, 20 two-bedroom units, and 15 three-bedroom units. The units will be multifamily rental units.

The additional offsite parcels are anticipated to include 70 units, including 20 1BR units, 30 2BR units, 20 3BR units.

d) Transfer of Assistance: Reduction or Change in number of units

Some of the Smiley Courts units will be transferred as part of this RAD conversion, but not all the units will be converted under RAD.

The chart below notes that the units to be converted to RAD through transfer of assistance from Smiley is within the total Smiley. The proposed RAD 147 count is within the total Smiley bedroom count.

BR	Original Smiley Units	Proposed RAD Units COLSQ3	Proposed RAD Units PCH3	Proposed RAD Offsite	Subtotal RAD Transfer of Assistance
0BR	0	0	0	0	0
1BR	51	15	0	20	35
2BR	92	20	0	30	50
3BR	94	15	27	20	62
4BR	30	0	0	0	0
5BR	17	0	0	0	0
Total	284	50	27	70	147

e) Reduction or Change in the number of units

Per the above chart, there is no change in the number of units anticipated.

f) Waiting List Transfer, where applicable

Since the Smiley Courts site is vacant, there is no existing waiting list at Smiley Courts that needs to be transferred.

g) PHA for the Original Site following the Transfer Of Assistance

Following the transfer of assistance, the Smiley Courts site will be demolished under Section 18.

5. An indication of whether the PHA is currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.

MHA + Voluntary Compliance Agreement or Consent Order

MHA is not under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision.

6. A statement certifying that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

Compliance with Site Selection Neighborhood Review Standards

The RAD conversion will comply with all applicable site selection and neighborhood reviews standards. All appropriate procedures have been followed.

7. All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.

Compliance with Significant Amendment Requirements

All Significant Amendment required information and certifications are completed, including Resident Advisory Board comments (if any) and responses, challenged elements (if any), and all required certifications.

8. For MTWs utilizing MTW Fungibility as defined in Section 1.9.E and Section 1.6 or 1.7, as applicable, a statement explaining how the MTW will be able to maintain continued service level requirements.

MTW Agency Statement

MHA is not an MTW agency.

Additional Notification: The following is from the RAD Rev 4 Notice: Additionally, in accordance with 24 CFR Part 903, during the PHA Plan submission and/or significant amendment stage, a PHA shall notify the public that the current and future Capital Fund Program Grants Budgets will be reduced as a result of any projects converting to RAD.

a. The PHA should provide an estimate of the amount of the current Capital Fund grant that is associated with the proposed project(s) and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan.

MHA's RAD financial analysis shows that MHA has more to gain over the term of the 20-year Section 8 contract for the 147 units despite needing to forego 5 years of DDTF funds and 3 years of Asset Repositioning Fees.

Potential Gain to MHA over 20 Years	
Anticipated 20 Years RAD Capital Funds	\$6,809,040
Anticipated 20 Years Section 8 Administrative Fees	\$1,764,000
Total "Lost" Capital Funds DDTF funds -- 5 years	(\$1,686,090)
Total "Lost" Asset Repositioning Fee -- 3 years	(\$1,143,072)
Projected Net Gain to MHA over 20-year RAD Section 8 Contract	\$5,743,878

B.6 Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?

Y N

(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

B.7 Certification by State or 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.



525 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104-4611
PHONE: (334)-206-7200 – FAX: (334)-206-7222 – WEBSITE: MHA.TODAY.ORG

FYB 2020 RAD OVERVIEW

1. A description of the units to be converted, including: a) the number of units, b) the bedroom distribution of units, and c) the type of units (e.g., family, elderly/disabled, or elderly-only);

RAD Overview

On January 24, 2018, MHA received approval from HUD to demolish all remaining buildings at Smiley Court, consisting of 284 dwelling units and 2 non-dwelling buildings, due in part to extreme foundation failure that rendered the units as uninhabitable and obsolete.

MHA subsequently applied to HUD for Tenant Protection Vouchers and received 137 TPVs for relocation purposes. All residents have been relocated from Smiley Courts.

MHA is in a position to apply for additional HUD rental assistance under RAD for the previously vacant units at Smiley Court that did not previously receive TPVs.

MHA has decided that RAD transfer of assistance will be financially beneficial to MHA.

MHA will use RAD transfer of assistance at the following sites: 1) Plaza Centennial Hill Phase 3 (PCH3); 2) Columbus Square Phase 3 (COLSQ3); and 3) additional offsite parcels to be identified.

PCH3 site boundaries are roughly Centennial Circle to the west, Hall Street to the east, King Cole Drive, Adams Avenue to the north and King Cole Drive to the south. The PCH3 census tract is 56.04.

COLSQ3 site boundaries are North Bainbridge Street, North Ripley Street, Randolph Way + Pollard Street, and the railroad tracks. The COLSQ3 census tract 33.01.

The additional offsite parcels are still to be identified. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

Units

MHA is submitting a RAD application for converting 147 of the units at Smiley Courts through RAD and transferring that assistance to new construction at the following sites: 1) Plaza Centennial Hill Phase 3 (PCH3); 2) Columbus Square Phase 3 (COLSQ3); and 3) additional offsite parcels. The additional offsite parcels are still to be identified. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

Bedroom Distribution of Units

PCH3 will include approximately 27 units, including 27 three-bedroom units.

COLSQ3 will include approximately 50 units, including 15 one-bedroom units, 20 two-bedroom units, and 15 three-bedroom units.

The additional offsite parcels are anticipated to include 70 units, including 20 1BR units, 30 2BR units, 20 3BR units.

Type of Units

PCH3 will include 27 multifamily rental units.

COLSQ3 will include 50 multifamily rental units.

MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels. So it is not known whether the units will be multifamily or elderly/disabled.

2. Any change in the number of units that is proposed as part of the conversion, including: a) de minimis unit reductions; b) unit reductions that are exempt from the de minimis cap; c) change in bedroom distribution

RAD Change in Number of Units

A change of units is not needed for the RAD transfer of assistance. MHA has received demolition approval for all 284 units at Smiley. MHA is seeking RAD transfer of assistance for PCH3, COLSQ3 and additional offsite parcels. After HUD approval of RAD application / receipt of CHAP, MHA will seek amended demolition approval from the HUD Special Applications Center. MHA will demolish the Smiley units that are not subject to the RAD transfer of assistance conversion.

3. Any changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted. This includes any waiting list preferences that will be adopted for the converted project.

a. If Converting to PBV: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.6, Attachment 1B of this Notice and the Joint Housing/PIH Notice H-2014-09/ PIH-2014-17.

Changes in Tenant Protections, Admission, Selection, Occupancy

As noted previously, all units at Smiley were approved for demolition under Section 18. All residents have been relocated from Smiley Courts under the relocation plan approved in connection with the demolition application.

Since Smiley Courts is vacant, and there are no existing residents, MHA will institute the provisions below for new RAD residents at PCH3, COLSQ3 and additional offsite parcels.

Project Based Voucher Requirements (Section 1.6 of PIH Notice 2019-23, REV-3 and Notice H 2016-17; PIH 2016-17)	
Tenant Protections Under Section 1.6.C (PBV)	
5.	Resident Participation and Funding
6.	Termination notification
7.	Grievance process
Tenant Protections Under Section 1.6.D (PBV)	
1.	Establishment of Waiting List
2.	Choice Mobility

Tenant Protections Under Section 1.6 C

5. Resident Participation and Funding. Residents RAD PBV 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. To facilitate the uniform treatment of residents and units at a Covered RAD Project, any non-RAD PBV units located in the same Covered RAD Project shall be subject to the terms of this provision.

6. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner’s lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate.

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 and to non-RAD PBV units located at the same Covered RAD Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
 - 1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - 2. In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. Not less than 14 days in the case of nonpayment of rent; and
- iii. Not less than 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. Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),⁴⁰ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project 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.
 1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
- iii. The Project Owner gives 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 Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered RAD Project shall be subject to the terms of this provision.

Tenant Protections Under Section 1.6 D

1. Establishment of Waiting List. 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the Covered RAD Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

- a. Transferring an existing site-based waiting list to a new site-based waiting list.
- b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
- c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
- d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 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 Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. 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. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁴³

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision. A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

2. Choice-Mobility. One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD. MTW agencies may not alter this requirement.

4. If there will be a transfer of assistance at the time of conversion, the significant amendment must include: a) the location to where the assistance is being transferred; b) the number of units to be transferred; c) the bedroom distribution of the units in the new building(s); and d) the type of units, if changed (e.g. family, elderly/disabled); and e) any reduction or change in the number of units and what reduction category they fall under (i.e. de minimis); f) how the waiting list will be transferred and how households will be selected for the transfer, where applicable; g) what the PHA plans to do with the original site following the transfer of assistance, consistent with allowable uses described in RAD Section 1.4.A.12.

a) Transfer of Assistance: Overview

This RAD transfer of assistance application for Smiley Courts is somewhat unique, since all units were approved for demolition under Section 18, and all residents have been relocated from Smiley Courts under the relocation plan approved in connection with the demolition application.

Assistance will be transferred to PCH3, COLSQ3, and additional offsite parcels are still to be identified. The location for PCH3 and COLSQ3 is included in Section 1 of this Amendment. MHA anticipates issuing a Request for Proposals in order to identify the additional offsite parcels.

b) Transfer of Assistance: Units

The total units to be transferred from Smiley is 147 units.

c) Transfer of Assistance: Bedroom Distribution + Unit Type

PCH3 will include approximately 27 units, including 27 three-bedroom units.

COLSQ3 will include approximately 50 units, including 15 one-bedroom units, 20 two-bedroom units, and 15 three-bedroom units. The units will be multifamily rental units.

The additional offsite parcels are anticipated to include 70 units, including 20 1BR units, 30 2BR units, 20 3BR units.

d) Transfer of Assistance: Reduction or Change in number of units

Some of the Smiley Courts units will be transferred as part of this RAD conversion, but not all the units will be converted under RAD. The chart below notes that the units to be converted to RAD through transfer of assistance from Smiley is within the total Smiley. The proposed RAD 147 count is within the total Smiley bedroom count.

BR	Original Smiley Units	Proposed RAD Units COLSQ3	Proposed RAD Units PCH3	Proposed RAD Offsite	Subtotal RAD Transfer of Assistance
OBR	0	0	0	0	0
1BR	51	15	0	20	35
2BR	92	20	0	30	50
3BR	94	15	27	20	62
4BR	30	0	0	0	0
5BR	17	0	0	0	0
Total	284	50	27	70	147

e) Reduction or Change in the number of units

Per the above chart, there is no change in the number of units anticipated.

f) Waiting List Transfer, where applicable

Since the Smiley Courts site is vacant, there is no existing waiting list at Smiley Courts that needs to be transferred.

g) PHA for the Original Site following the Transfer Of Assistance

Following the transfer of assistance, the Smiley Courts site will be demolished under Section 18.

5. *An indication of whether the PHA is currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.*

MHA + Voluntary Compliance Agreement or Consent Order

MHA is not under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision.

6. *A statement certifying that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.*

Compliance with Site Selection Neighborhood Review Standards

The RAD conversion will comply will all applicable site selection and neighborhood reviews standards. All appropriate procedures have been followed.

7. *All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.*

Compliance with Significant Amendment Requirements

All Significant Amendment required information and certifications are completed, including Resident Advisory Board comments (if any) and responses, challenged elements (if any), and all required certifications.

8. *For MTWs utilizing MTW Fungibility as defined in Section 1.9.E and Section 1.6 or 1.7, as applicable, a statement explaining how the MTW will be able to maintain continued service level requirements.*

MTW Agency Statement

MHA is not an MTW agency.

Additional Notification

The following is from the RAD Rev 4 Notice: Additionally, in accordance with 24 CFR Part 903, during the PHA Plan submission and/or significant amendment stage, a PHA shall notify the public that the current and future Capital Fund Program Grants Budgets will be reduced as a result of any projects converting to RAD.

a. The PHA should provide an estimate of the amount of the current Capital Fund grant that is associated with the proposed project(s) and the impact on the PHA’s current Five-Year PHA Plan and Five-Year Capital Fund Action Plan.

MHA’s RAD financial analysis shows that MHA has more to gain over the term of the 20-year Section 8 contract for the 147 units despite needing to forego 5 years of DDTF funds and 3 years of Asset Repositioning Fees.

Potential Gain to MHA over 20 Years	
Anticipated 20 Years RAD Capital Funds	\$6,809,040
Anticipated 20 Years Section 8 Administrative Fees	\$1,764,000
Total “Lost” Capital Funds DDTF funds -- 5 years	(\$1,686,090)
Total "Lost" Asset Repositioning Fee -- 3 years	(\$1,143,072)
Net Gain to MHA over 20-year RAD Section 8 Contract	\$5,743,878



525 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104-4611
PHONE: (334)-206-7200 – FAX: (334)-206-7222 – WEBSITE: MHA TODAY.ORG

FYB 2020

GOAL & OBJECTIVES

FYB 2020 Goals and Objectives

IMPROVE PUBLIC HOUSING & HCV OPERATIONS

Achieve “High Performer” rating under the PHAS and SEMAP (or HUD equivalent) program:

Objectives-

- Reduce unit turn-around time to 10 days
- Complete emergency work orders within 24 hours, routine work orders within 1 day, ensuring UPCS inspection on 100% of dwelling units and systems
- Identify the systems to be inspected by site and include in the preventive maintenance plan
- Ensure that all indicators are performed consistently, according to high-performance criteria
- Ensure units are inspected annually, and re-inspections are conducted within 28 days after failed inspection

Improve the quality of life of residents in all communities:

Objectives-

- Upgrade curb appeal to all properties and, improve common areas
- Install additional security and safety measures dwelling units’ interiors and exteriors
- Partner with the Montgomery Police Department to increase public patrols and to conduct periodic patrols for safety

Improve customer service and communication between residents and applicants:

Objectives-

- Improve technology utilization to facilitate communication with residents
- Implement resident communication plan
- Continue waitlist management
- Respond to all (internal & external) inquiries the same day they are received
- Continue customer service training
- Host landlord meetings, and partner with stakeholders
- Implement customer service satisfaction survey

Utilize the established asset management protocol to routinely measure performance in management indicators at mixed finance developments:

Objectives-

- Ensure that properties are in compliance with prevailing building code and HUD regulations
- Ensure properties are following the rent collection policy per MHA policy and HUD requirements

FYB 2020 Goals and Objectives

Develop and implement an affirmative marketing plan to reach out to under-represented groups:

Objectives-

- Increase participation of underrepresented groups in all housing and HCV programs by promoting diversity and inclusion
- Increase presence among under-represented populations
- Continue to comply with all fair housing policies and laws
- Promote fair housing and equal opportunity

Decrease crime in all public housing communities:

Objectives-

- Increase participation in public safety efforts
- Continue to monitor surveillance activity, during and after business hours
- Ensure that all exterior lighting is in working order
- Enforce parking policies at all sites

Provide staff training opportunities:

Objectives-

- Increase staff capacity and growth potential

Streamline business processes, to create effective and/or efficient program administration

Objectives-

- Adopt policies that will allow two-year re-certifications, for families on fixed income

Optimize Management (and HUD) reports to ensure that the program resources are being optimized and/ or utilized, within the budget authority:

Objectives-

- Maintain a funding utilization rate of 98% or better
- Ensure that units are not placed "on-hold" for more than 120 days
- Ensure that program voucher utilization is at 97% or better

Develop translate marketing material in languages, as needed:

Objectives-

- Provide printed documents in Spanish

Rebrand the Housing Choice Voucher (HCV) Program by developing a new HCV orientation package to include an electronic brochure and tenant orientation video to website:

Objectives-

- Inform the public of available affordable housing resources
- Display materials, to project a positive image of affordable housing communities
- Establish visibility, in the broader community by actively participating in local professional organizations

FYB 2020 Goals and Objectives

Streamline business processes by utilizing technology paperless communication where applicable:

Objectives-

- Fully utilize software, train staff accordingly
- Evaluate Staffing needs, realign where necessary
- Adopt policies that will allow two-year re-certifications for families on fixed income and allow remote re-certifications for the program

Train and cross-train staff:

Objectives-

- Minimize the need for outside contractors
- Cross-train staff on all components of HCV Program
- Ensure that all HCV Housing Specialists obtain certification within first year of employment
- Ensure that each new HCV Housing Specialist completes the 6-week, outlined "New Housing Specialist Training", within the first two months of employment

Create and promote economic self-sufficiency opportunities through Homeownership programs and community partnerships:

Objectives-

- Increase the number of families participating in the HCV Homeownership Program
- Increase the number of families participating in the HCV Family Self-Sufficiency program
- Forge relationships with higher learning institutions and technical schools

Ensure that properties on the program comply with HQS, neighborhood and local building codes:

Objectives-

- Ensure that families are living in decent, safe communities and dwellings
- Deconcentrate poverty areas

Increase Customer Satisfaction:

Objectives-

- Respond to internal and external inquiries within 24 hours
- Continue customer service training sessions for employees
- Review internal controls to improve the delivery of services to our constituents
- Promote excellence by exceeding standards
- Install Kiosk in main lobby to automate service
- Implement telephone tracking system software



FYB 2020 Goals and Objectives

IMPROVE FINANCIAL HEALTH OF THE MHA

Objectives-

- Develop five-year budget forecasting tool

IMPROVE PROCUREMENT OPERATIONS

Objectives-

- Automate and streamline procurement/contract processes, to include a qualified vendor listing of pre-negotiated prices for trades services
- Improve minority participation involvement in trade service workshops
- Implement E-Procurement and work with companies to increase participation
- Increase Section 3 participation
- Conduct minority-owned business workshops

AUGMENT INFORMATION TECHNOLOGY AGENCY WIDE

Objectives-

- Improve application of new technology internal and external
- Ingrate the information technology platform across all departments

HUMAN RESOURCES

Objectives-

- Continue to standardize human resources management practices in the areas of hiring, retention, employee development, benefits, testing, and compliance with federal, state and local regulations
- Implement outreach efforts to reach a diverse group of competent workers, when recruiting for vacancies
- Implement leadership training, to promote a positive company culture, sense of belonging, empower, inspire and drive overall goals and objectives of MHA
- Continue Customer Service Training, to ensure high levels of customer service
- Ensure that HAIG identified deficiencies are corrected within 30 days after being identified
- Develop a strategy to promote workplace diversity
- Improve public image of MHA, through networking opportunities
- Develop staff/compensatory retention plan to recruit top talent
- Develop strategies to promote team dynamics, unity and morale

FYB 2020 Goals and Objectives

EXPAND AND ADVANCE REAL ESTATE ACTIVITIES TO IMPROVE HOUSING INVENTORY

Reposition assets to create viable and sustainable communities by leveraging resources and building partnerships:

Objectives-

- Redesign the site plan for the final phase of Columbus Square
- Engage residents, an urban planning firm and other community stakeholders to formulate a comprehensive redevelopment strategy for Paterson Court
- Complete the disposition of obsolete properties in the MHA portfolio
- Seek opportunities to acquire and develop replacement housing for demolished units
- Partner with other non-profit and for-profit developers to increase the number of affordable units across the community
- Re-master plan and self-develop Phase III of the Plaza at Centennial Hill
- Demolish unsafe structures at Smiley and redevelop off-site
- Reposition/Redevelop of non-performing or obsolete assets

Strategic Financial Planning for Organizational Stability:

Objectives-

- Use MHA's investment in development activities to leverage additional funding for services and economic development activities that will benefit residents
- Implement a comprehensive funding strategy to increase resources by pursuing Choice Neighborhood Planning and Implementation grants, Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) funding, and other public and private funding opportunities that may arise
- Focus on poverty deconcentration by seeking to develop mixed income housing in communities with better access to desirable amenities
- Use non-profit subsidiary instrumentalities as vehicles to take advantage of funding opportunities such as HOME Investment Partnership, CDBG services, and other opportunities that may come available
- Streamline data collection to ensure that all required reporting for grant funding is easily accessible and consistent with the respective requirements

Implement a Rental Assistance Demonstration Initiative:

Objectives-

- Use RAD as tool to expand access to quality housing
- Convert Smiley Court Units to RAD
- Develop new housing that will include RAD units
- Promote RAD as an opportunity for gap financing for other affordable housing developers
- Amend existing Smiley Courts Demolition Approval to accommodate RAD transfer of assistance

FYB 2020 Goals and Objectives

Continue Implementing Overall Community Redevelopment Strategy:

Objectives-

- Seek opportunities in the public and private market to eliminate blight, through comprehensive neighborhood planning
- Develop affordable rental housing units, complementary to the previous Phases I and II of Columbus Square and the Plaza at Centennial Hill
- Implement a walkable communities' strategy with engaging community spaces on all future MHA developments
- Encourage activities that promote resident advancement and economic independence
- Involve local community stakeholders in the redevelopment process
- Leverage public and private funds for sustainable economic growth
- Partner with the City of Montgomery on the Comprehensive Plan and Analysis of Impediments to Fair Housing Choice activities to ensure affordable housing is included

Eliminate Blight and augment current redevelopment or renovation projects:

Objectives-

- Acquire adjacent properties in project areas for redevelopment through new construction, rehabilitation or demolition
- Provide space to accommodate additional amenities (i.e., parking, Pre-K classrooms, playgrounds and employment training activities)
- Implement an infill housing strategy that will complement de-concentration efforts

Repair, Renovate or Modernize Public Housing Units:

Objectives-

- Implement a comprehensive site and dwelling maintenance improvement plan for all MHA developments to extend the viability of the assets
- Replace energy-efficient equipment and appliances across all properties

Ensure all properties and dwelling units (where applicable) comply with governing accessibility standards:

Objectives-

- Develop five-year plan to ensure designated units comply with the 504 accessibility requirements

INCREASE ASSISTED HOUSING CHOICES

Objectives-

- Approve family members as live-in aides
- Change reporting of interim changes from 30 days to 10 days
- Eliminate the preference of conduct face-to-face reexaminations
- Allow minimum cost to landlords for reinspections under certain circumstances

FYB 2020 Goals and Objectives

- MHA Website and social media as publishing outlets for notification of reopening waiting list
- MHA Administrative Plan, one-third (33%) of the amount owed must be paid. Amount changed from 25%
- Initial voucher term will be 60 calendar days
- Remove age requirement of bedroom size for children of opposite sex

**PROVIDE AN IMPROVED LIVING ENVIRONMENT FOR PUBLIC HOUSING
COMMUNITIES**

Objectives-

- Implement infill development strategy around existing developments
- Foster a positive narrative through affirmative marketing
- Promote safety and energy saving standards

**PROMOTE SELF-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED
HOUSEHOLDS**

Objectives-

- Increase program interest, by including information in the new admission and transfer briefings, by organizing FSS orientations at public housing community centers
- Present both FSS and HCV Homeownership information during new admission and relocation briefings
- Present Homeownership seminars, from local mortgage companies and local realtors, to encourage future homeownership opportunities and participation in the HCV Homeownership program
- Enroll families to participate in the HCV homeownership program
- Increase participation in FSS and ROSS programs and establish more escrow accounts
- Post list of job opportunities within public housing communities
- Continue to enforce Assist the work activity policy, and increase awareness of employment opportunities
- Assist residents interested in entrepreneurial activities
- Increase the number of persons receiving a GED and post-secondary/technical school degree

Increase partnerships with service providers:

Objectives-

- Connect residents with services in the community that promote wellness, education, employment, and financial literacy
- Formalize partnerships with service providers that outline goals, objectives, and reporting requirements

FYB 2020 Goals and Objectives

- Partner with organizations to sponsor at least one wellness/prevention activity per quarter within at least 2 housing communities
- Coordinate financial literacy workshops for adults and youth
- Partner with Montgomery Public School (MPS) and the Montgomery Co. District Attorney's Office to provide additional support for youth at risk of being truant.

Equal Opportunity and Affirmatively Further Fair Housing Statement

The Montgomery Housing Authority affirmatively furthers Fair Housing, in the administration of its programs, by complying fully with all Federal, State and local nondiscrimination laws and administering programs, in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing and marketing its program to members of protected classes who are "least likely to apply".

The Authority shall not discriminate against any applicant, participant, or landlord because of race, color, national or ethnic origin or ancestry, religion, sex, age, familial status, marital status, parental status, sexual orientation, military status or disability.

This is a fundamental policy of the MHA, as it is committed to due diligence, in assuring equal housing opportunities and non-discrimination in all aspects of its housing activities. MHA has embraced an ethical, as well as the legal, imperative to aggressively ensure that MHA's housing programs comply fully with all local, state and federal fair housing laws including, the Fair Housing Act of 1968, as amended (Fair Housing Act) and its implementing regulations. Additionally, the MHA is implementing special initiatives to affirmatively further fair housing, as required by Section 808(c)(5) of the Fair Housing Act. These efforts to affirmatively further fair housing include: promoting the de-concentration of poverty; income-mixing; and opportunities for families to live in the various, diverse communities throughout the City of Montgomery.



525 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104-4611
PHONE: (334)-206-7200 – FAX: (334)-206-7222 – WEBSITE: MHA TODAY.ORG

FYB 2020 PROGRESS REPORT

FYB 2020 PROGRESS REPORT

EXPANSION OF SUPPLY
(Modernization/Development)

Progress:

- The site plan and specifications for the final phase of The Plaza at Centennial Hill, including the Lister Hill lot were completed in 2018. The project was advertised for bid at the end of 2018 with bids received in February of 2019.
- MHA launched the construction of Phase II of Columbus Square. It is comprised of 80 total units of affordable housing, of which 25 will be public housing units;
- Phase III of Columbus Square planning and design began in 2018. The construction pricing far exceeded the TDC limits. MHA is evaluating alternative funding sources and a new co-development partner to implement the final phase of Columbus Square.
- MHA issued an RFP for a Co-developer in 2018. The primary focus of the partnership is new construction of replacement housing for units lost at Smiley Court and planning for the anticipated repositioning of Paterson Court. MHA selected a co-developer partner and is currently in negotiations for the Development Rights Agreement.
- MHA in collaboration with the Cleveland Avenue YMCA secured a grant for a new Pre-K classroom which will be located in the new Parks Place administration building.

QUALITY OF ASSISTED HOUSING, TO INCLUDE MANAGEMENT OF PUBLIC HOUSING AND HOUSING MANAGEMENT OF PUBLIC HOUSING

Progress:

- MHA has implemented a site-based, waiting lists, at select public housing communities.
- MHA contracted with a private management company to conduct annual inspections on all its public housing units, using HUD-approved UPCS protocol. This continues to lead to significant increases in physical inspection scores for all public housing sites.
- The regularity of housekeeping inspections and grounds inspections has increased. This has enabled management to prevent severe damages to units.
- MHA has implemented an online work order system for residents.
- MHA has installed surveillance cameras, to improve safety in the public housing communities.
- MHA continues its collaboration with the local law enforcement. MPD provides weekly walk-throughs, with site-management, and attends monthly community meetings. MHA has contracted off-duty MPD officers to provide security in select public housing properties.
- MHA Continues to utilize the point-of-sale machines, in public housing communities;
- MHA has implemented online payments, where residents can pay rent and other charges, with selected retailers.

FYB 2020 PROGRESS REPORT

- MHA continues to encourage the use of email addresses and cell phone numbers, to improve communication with public housing residents and applicants.
- MHA continues to enforce the Smoke-Free Policy at all Public Housing communities.
- MHA continues to utilize the online public housing/ assisted housing applications and is in the process of implementing online certification processes.
- Imaged 100% of public housing and housing choice voucher files.

CUSTOMER SATISFACTION

Progress:

- Using its website and virtual community networks, MHA has provided increased opportunities for customers to provide timely feedback.
- Specific Management functions, in addition to those referenced above, include Customer Service training, semi-annually, for all HCV staff members.
- Online application submittal, whenever the waiting list is open.
- Online service request has been implemented.

FINANCE

Progress:

- Streamlined accounts payables process, with automatic approval and invoice tracking and matching to purchase orders.
- Implemented a new process to receive online payments from residents for rent and other tenant-related charges.
- Increased training for staff, through webinars and online classrooms for more efficient results.
- Improved accounting processes, by developing more analytical reviews to align with month end reporting.
- Achieved budgetary goals, through increased communication with procurement and other areas to maintain costs.

Procurement

Progress:

- Adopted an electronic procurement system, to streamline operations and ensure compliance with the complex HUD procurement guidelines.
- Implemented electronic Inventory system and trained the management on to adequately record inventory in the database.

FYB 2020 PROGRESS REPORT

HOUSING CHOICE VOUCHER (HCV) PROGRAM

Progress:

- MHA continues to organize public workshops and highlight the virtues of the HCV program to increase the level of participation.
- Uses virtual community networks, and the MHA website, to alert stakeholders on affordable housing program updates.
- Changed program policy for HQS enforcement; reducing the amount of time a unit can remain on abatement before the family has to relocate to a new unit.
- MHA continues to research the practicality of recertifying a select population (Fixed Income participants) every two years. This practice is addressed in HUD's Streamlining PIH Notice of 2016 to reduce administrative costs, as well as, to reduce inconvenience to residents and increases operational efficiency.
- MHA staff has updated Administrative Plan to include updated PIH Notices and best practices to optimize program utilization and operational efficiency.
- MHA HCV department has completed document scans for existing participants. Document scanning is now a procedural process with all transactions.
- SOP's are being updated for all procedures.

IMPROVE LIVING ENVIRONMENT FOR PUBLIC HOUSING RESIDENTS

Progress:

- Continues to increase collaboration with the MPD. Community Police are providing weekly park, walk and talk at all communities and attend monthly community meetings. This will empower residents to take ownership of their communities.
- MHA has installed Security cameras at Public Housing sites. This serves as a deterrent to criminal activities and provides the MPD additional tools in policing housing communities.
- MHA will conduct and implement recommendations, from a 2018 Energy Audit, in an effort to promote energy efficiency.
- MHA has completed the file scan for all public housing documents and continues the utilization of this process.

PROMOTION OF SELF-SUFFICIENCY

Progress:

- Currently, 198 families are participating in the combined Family Self-Sufficiency FSS program.
- MHA continues to distribute interest forms to participants wanting to know more about the FSS program at the HCV new admission and transfer briefings. A follow-up contact was scheduled with all interested participants.

FYB 2020 PROGRESS REPORT

- FSS Coordinators work with participants individually to assist them with job search and scheduling interviews. MHA works very closely with the Career Center and LEAD Staffing to link residents/participants to employment opportunities.
- The Montgomery Housing Authority continues to maintain a partnership with several local agencies and organizations to assist residents with becoming self-sufficient. Available services include assistance with job readiness, employment searching, credit repair/rebuilding, money management, job training, education, and homeownership.
- Homeownership seminars are offered, throughout the year, to educate residents on the home buying process and the advantages of owning a home. Sessions covered included: HCV Homeownership program; the importance of credit scores; money management/budgeting; what to look for in a home; down payment assistance; equity and closing costs.
- The FSS Program continues to host Financial Literacy workshops, throughout the year, to educate residents on saving money and improving their credit to become eligible for mortgage loans with the lowest interest rates.

ENSURING EQUAL OPPORTUNITY AND AFFIRMATIVELY FURTHERING FAIR HOUSING

Progress:

The MHA has maintained, in its lobby, a bulletin board, which accommodate the following posted materials:

1. Statement of Policies and Procedures governing the HCV Administrative Plan and the Public Housing ACOP.
2. Open Occupancy Notice (applications being accepted and/or not accepted)
3. Income Limits for Admission
4. Utility Allowances
5. Informal Review and Hearing Procedures
6. Fair Housing Poster
7. "Equal Opportunity in Employment" Poster

Additionally, as part of the briefing process, the MHA has provided information to applicant families, about civil rights requirements and the opportunity to rent in a broad range of neighborhoods.

The City of Montgomery, Alabama conducted an Analysis of Impediments (AI) to Fair Housing Choice in 2014, as part of its 2014-2019 Consolidated Plan. The AI identified fourteen impediments, with one specifically directed to MHA that impacts residents' fair housing choice

FYB 2020 PROGRESS REPORT

in the City: Racial and Economic Isolation of Public Housing Residents, which states that both voucher holders and public housing residents live in poor, racially-concentrated neighborhoods.

Since the initial 2014 AI report, MHA has endeavored to address this impediment. To lessen racial and economic isolation, and achieve greater housing choice, MHA expanded landlord outreach and conducted annual landlord orientation meetings. In addition, MHA encourages applicants to seek housing throughout the City and the surrounding MSA as part of the HCV briefing process.

To further combat the disparity, MHA has coordinated with the City of Montgomery to educate and inform community stakeholders to encourage the development of affordable housing throughout the City with the support and mutual investment of city funds. MHA is engaged in ongoing efforts to identify land suitable for housing development efforts that will meet or exceed the HUD site and neighborhood standards and deconcentration goals.

MHA is committed to overcoming this impediment through the following actions which, along with others, have been included in MHA's 2019 Annual and 5-Year Plan submission.

- propose a City ordinance requiring new multi-family developers to earmark a percentage of dwellings for low-income families – inclusionary zoning, to encourage the development of affordable housing throughout the City, with the support and mutual investment of City funds. City officials need to take a strong stand against “Not in My Backyard” attitudes;
- land bank future development sites in non-impacted census tract areas;
- continue to work to identify land for acquisition, suitable for MHA's housing development efforts that meet or exceed the HUD site and neighborhood standards;
- conduct outreach efforts, to recruit potential HCV landlords and continue to host workshops to educate and familiarize potential and existing landlords on the HCV program;
- coordinate annual fair housing training.

MIXED-FINANCE HOUSING DEVELOPMENT PLAN

Progress:

The Plaza at Centennial Hill (formerly Victor Tulane Court)

- Victor Tulane Court Phase Redevelopment, now known as The Plaza at Centennial Hill, was approved by HUD, on March 28, 2012. Phase I is comprised of 129 dwelling units and was completed in 2013. Phase II consisted of 129 dwelling units and was completed in July 2016. MHA is currently master planning Phase III to be self-developed by MHA, for

FYB 2020 PROGRESS REPORT

an additional 40 public housing units, utilizing MHA operating reserves, escrow funds and/or Capital Funds. MHA intends to make an OFFP submission, and development/site acquisition proposal, to HUD in 2018. Construction is expected to commence in 2019.

Columbus Square (formerly Trenholm Court)

- The second property scheduled for new construction, using the mixed-finance model, is the former Trenholm Court. The MHA received approval from HUD and the Special Applications Center to demolish Trenholm Court in 2011. MHA and its developer partner applied for and received a 9% tax credit allocation from the Alabama Housing Finance Authority (AHFA), in June 2015 for Phase I and in June 2017 for Phase II. Phase I and Phase II of Columbus Square are comprised of 80 units in each phase. Construction is completed on Phase I and fully occupied. Phase II construction is underway and scheduled to be complete by December 2019. MHA expects its developer partner to submit a 9% tax credit application for Phase III in early 2019.

Smiley Court and Paterson Court

- MHA issued an RFP for a private developer partner to develop Smiley Court replacement housing, off-site, through new construction and/or acquisition/rehab in 2018. MHA expects to select a developer partner, execute a Master Developer Agreement and commence initial master-planning for the first phase in 2019.
- MHA issued an RFP for a private developer partner to reposition Paterson Court and redevelop additional affordable housing units at off-site locations in 2018. Paterson Court redevelopment is expected to follow Smiley Court's redevelopment on the overall schedule at this time.

DEVELOPMENT TEAM

Progress:

The Authority plays a significant role in each mixed-finance development and responsible for overall project success. This approach allows the agency to build its development skills and replicate the process in future development projects.

The development team is comprised of the following:

- Executive Director
- Financial Consultant
- Development Partner
- Architect and Engineer
- General Contractor
- Environmental Consultant

FYB 2020 PROGRESS REPORT

- Mixed-finance Legal Counsel
- Market Analyst
- Director of Real Estate Development
- Program Manager

SCHEDULE & FINANCING

Progress:

The Director of Real Estate Development works closely with MHA's financial and development consultants and the developer, to create a comprehensive schedule for the redevelopment of Columbus Square and the final phase of development at The Plaza at Centennial Hill. The redevelopment schedule for Columbus Square is heavily dependent upon the award of Low-Income Housing Tax Credits (LIHTC), while The Plaza at Centennial Hill Phase III will be self-developed, by MHA, through OFFP funds.

MHA has sufficient sources to complete the redevelopment of Tulane Court/The Plaza at Centennial Hill and continue the redevelopment at Trenholm Court/ Columbus Square. MHA realized a share of the developer-fee, from each phase of the redevelopment at both Tulane Court and Trenholm Court. The Authority provided a ground lease, to the partnership formed to own the improvements, at each phase of the housing developments. MHA's development partners provided necessary financial guarantees.

PROGRAM CHARACTERISTICS AND NEXT STEPS

Progress:

MHA is committed to utilizing its public assets to improve the quality of life and economic health of its residents as well as community neighborhoods. The Victor Tulane Court property was recognized by the City of Montgomery as an "opportunity site" in the Downtown Master Plan. MHA's vision for this redevelopment is to create a community where people of different economic strata, races, and cultures will live, learn, work, and raise families in close proximity to abundant employment, retail and cultural opportunities.

The Authority is committed to expanding its presence in the affordable housing community and going beyond the bounds of a traditional HUD-subsidized public housing. MHA realizes that there is a substantial demand for not only housing at the low- income level, but also for workforce housing and subsidized, service-enriched housing for the elderly. Having studied models of other public housing authorities, in communities across the country that have become agents of change in those cities, MHA plans to play a significant role in the revitalization of the City of Montgomery.

FYB 2020 PROGRESS REPORT

The Authority has worked with city planners to ensure that its new developments are in line with the City's Downtown Master Plan and the recent redevelopment study of Centennial Hill - the historically significant neighborhood of which the Plaza at Centennial Hill (formerly Victor Tulane Court) is a part.

MHA requires that development, design, construction and long-term operations of the project is environmentally sound, resource efficient and respectful of the physical, historical and cultural traditions of the prospective residents and surrounding neighborhoods. LIHTC is vital to the success of this project; the Authority must adhere to standards outlined in the most recent Qualified Allocation Plan ("QAP") from the Alabama Housing Finance Authority (AHFA). MHA and its development partner also ensure that the following development values are represented in the redevelopment program of Tulane and Columbus Square:

- Creation of rental units indistinguishable, in quality and visual appearance, from rental units for other levels of income in developments that are contiguous and integrated into the larger community.
- Maximization of public and affordable housing opportunities for residents.
- Maximization of the use of private financing, to minimize the investment of limited MHA resources.
- Establishment of an avenue, to engage residents of all income levels and backgrounds, local institutions and other stakeholders in the revitalization effort.
- Creation of employment and business opportunities for public housing residents, resident-owned businesses and other minority/women-owned businesses that provide bona-fide commercial value to the project, such that residents and businesses obtain/build skills and experiences, through working with MHA-related development projects, that can be valuable in non-MHA-related work.
- Reflection of architectural and urban design standards of Montgomery neighborhoods, recognizing applicable cost limitations.
- Enhancement of the professional knowledge, skills and ability of the MHA development, financial and management staff.
- Inclusion of the community and potential residents, throughout the development process.
- Use of the principles of New Urbanism, whenever feasible, to establish an environmentally affable community that promotes diverse, compact, vibrant and mixed-use communities.

In addition to the redevelopment projects listed above, the Housing Authority also investigated the feasibility to add more affordable housing units to its portfolio, through acquisition and



FYB 2020 PROGRESS REPORT

rehab and/or new construction projects and joint public/private partnerships. Multiple sites are currently under review for financial feasibility.

Other efforts, to increase the supply of affordable housing in Montgomery, include reviewing PBVs, under the HCV program. These efforts may also include issuing an RFP for PBVs, through joint partnerships with the private sector, to the extent such partnerships would benefit the MHA and create additional revenue streams for the agency.

In regard to the demolition and disposition activities planned for the upcoming year, MHA intends:

- Acquisition Rehab and/or new construction for the development of replacement housing for Smiley Court.
- To explore seeking approval for the demolition/disposition of Paterson Court and potential off-site acquisition/rehab and/or new construction.
- Submit additional disposition amendments, as necessary, for Phases III and IV of the former Trenholm Court for development activities.

Finally, MHA previously received disposition approval from HUD for the sale of the Cedar Park property. This property is the former site of 230 public housing units that were previously demolished in 2003. The Housing Authority intends to work with the non-profit community to discuss using the property for a commensurate public benefit.