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# FYB 2021

# PHA ANNUAL PLAN

<b>A.</b>	<b>PHA Information.</b>
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<b>A.1</b>	<p>PHA Name: Montgomery Housing Authority <span style="float: right;">PHA Code: <u>AL006</u></span>          PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA          PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2021</u>          PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)          Number of Public Housing (PH) Units <u>1450</u> Number of Housing Choice Vouchers (HCVs) <u>3064</u> Total Combined Units/Vouchers  <u>4514</u>          PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> 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.</p> <p><b>The Montgomery Housing Authority (MHA) Annual Plan is provided for public view on our website <a href="http://www.mhatoday.org">www.mhatoday.org</a> and at the following locations:</b></p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width:20%;">AMP NUMBER</th> <th style="width:40%;">PROPERTY NAME</th> <th style="width:40%;">PROPERTY ADDRESS</th> </tr> </thead> <tbody> <tr> <td>Main Office</td> <td>MHA Central Office</td> <td>525 S. Lawrence Street, Montgomery, AL 36104</td> </tr> <tr> <td>AL006000002</td> <td>Parks Place</td> <td>1026 Rosa Parks Avenue Montgomery, AL 36108</td> </tr> <tr> <td>AL006000004</td> <td>Paterson Court</td> <td>609 Winnie Street Montgomery, AL 36104</td> </tr> <tr> <td>AL006000006</td> <td>Gibbs Village East</td> <td>1701 Terminal Road Montgomery, AL 36108</td> </tr> <tr> <td>AL006000007</td> <td>Gibbs Village West</td> <td>2025 Terminal Road Montgomery, AL 36108</td> </tr> <tr> <td>AL006000009</td> <td>The Terrace</td> <td>1301 Adams Avenue Montgomery, AL 36104</td> </tr> <tr> <td>AL006000012</td> <td>The Plaza at Centennial Hill I</td> <td>515 Percy Drive Montgomery, AL 36104</td> </tr> <tr> <td>AL006000013</td> <td>The Plaza at Centennial Hill II</td> <td>515 Percy Drive Montgomery, AL 36104</td> </tr> <tr> <td>AL006000011</td> <td>Victor Tulane Gardens</td> <td>1101 Victor Tulane Cir, Montgomery AL 36104</td> </tr> <tr> <td>AL006000014</td> <td>Columbus Square I</td> <td>645 Columbus Street Montgomery, AL 36104</td> </tr> <tr> <td>AL006000015</td> <td>Columbus Square II</td> <td>645 Columbus Street Montgomery, AL 36104</td> </tr> </tbody> </table> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p>	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
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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

<b>Population</b>	199,525
<b>Households</b>	78,217

Source: 2017 American Community Survey, Demographic and Housing Estimates

<b>Median HH Income</b>	\$42,419
<b>Mean HH Income</b>	\$60,139
<b>Poverty Rate – Family</b>	18%
<b>Poverty Rate – Individual</b>	29.3%
<b>Vacancy Overall</b>	15.6%
<b>Vacancy Homeowner</b>	(X)
<b>Vacancy Renter</b>	(X)
<b>Median Home Value</b>	\$119,500
<b>Median Rent</b>	\$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
<b>Waiting List Total</b>	5812	308	94%	6%	2743	31%	3051
<b>Extremely low income (&lt;=30% AMI)</b>	5648	303	95%	5%	2716	57.4%	
<b>Very low income (&gt;30% but &lt;=50% AMI)</b>	131	5	2.3%	1.6%	22	0.8%	
<b>Low income (&gt;50% but &lt;80% AMI)</b>	33	0	0.6%		5	0.2%	
<b>Families with children</b>	3360	190	58.5%	61.7%	1733	53.2%	
<b>Elderly families</b>	107	8	1.9%	2.6%	52	1.9%	
<b>Families with Disabilities</b>	938	43	16.3%	14%	438	16%	
<b>Race/ethnicity (White)</b>	421	5	7.3%	1.6%	220	9%	
<b>Race/ethnicity (Black)</b>	5153	292	89.7%	94.8%	2519	91.8%	
<b>Race/ethnicity (Asian/Other)</b>	74	0	1.3%	0	36	1.3%	
<b>Race/ethnicity (Hispanic)</b>	133	4	2.3%	1.3%	51	1.9%	

**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
<b>Total</b>	<b>\$ 40,133,741</b>	

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

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

Further, as it relates to Choice Neighborhoods Planning Grant, MHA submitted an application and plans to use funds towards redevelopment in and around Paterson Court.

## **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.

As it relates to development, 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 (AI) program to build infill housing to stabilize key neighborhoods, especially in low impact areas, to aid in the deconcentration of poverty.

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

MHA will also explore off-site acquisition opportunities in the upcoming year to replace ACC units lost due to the demolition at Smiley Court. MHA will seek to replace these ACC units with other HUD subsidized units to the maximum extent feasible.

Further, MHA plans to continue engaging community stakeholders in the upcoming year to formulate a comprehensive re-development strategy for Paterson Court. MHA has applied for the Choice Neighborhoods Planning Grant and if awarded; will use the funds and resources to redevelopment in and around Paterson Court.

MHA may also elect to explore opportunities under its non-profit affiliate to leverage funding opportunities such as LIHTC, HOME, CDBG, and other appropriate housing sources.

## **3. Demolition or Disposition**

MHA 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.

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.

## **4. Conversion of Public Housing to Project-Based Assistance under RAD**

MHA intends to apply for RAD for the units at Smiley Court that were vacant at the time of the HUD demolition application approval and did not subsequently receive tenant relocation vouchers. Under this approach, MHA will expand access for quality affordable housing at Columbus Square, Plaza Centennial Hill and other potential off-site locations. MHA expects to apply for up to 147 units which will consist of a mix of multi-family 1, 2, and 3-bedroom units and/or single family, 3 and 4-bedroom units. This conversion of assistance is for units approved for demolition at Smiley Court. Since the Smiley Court site is located in non-desirable area with few amenities and across from an industrial chicken processing plant, using the RAD Project-Based Assistance option will allow MHA to develop the third phases of Columbus Square and the Plaza at Centennial Hill which are located in easily accessible locations. The Site and Neighborhood standards at these locations have been previously reviewed and approved by HUD, thereby creating opportunities to develop new subsidized units in MHA's portfolio for its low-income families.

Additionally, MHA will further explore direct RAD transfer of assistance for the ACC units in the mixed-finance developments at The Plaza at Centennial Hill Phase I and Phase II in the upcoming year.

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.

MHA further expects to issue a RFP in the upcoming year for the transfer of assistance from the vacant ACC units at Smiley Court that did not receive tenant relocation vouchers to RAD as may be necessary for various transactions which may include but is not limited to the following scenarios:

## **5. Project-Based Vouchers**

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.

## **6. Other Capital Grant Programs**

MHA will apply for Emergency Safety and Security Grants as may become available. Security concerns remain a top priority for MHA and the residents. MHA has applied for HUD Choice Neighborhoods Planning Grant 2020. MHA has applied HUD Jobs Plus Initiative 2020. MHA has applied for HUD Mainstream Voucher Program 2020.

## **7. Site-Based Waiting List**

MHA has a site-based waiting list at the Plaza at Centennial Hill and Columbus Square mixed-Finance properties.

<b>B.3</b>	<p><b>Civil Rights Certification.</b></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. See ATTACHMENT a1006a02.</p>
<b>B.4</b>	<p><b>Most Recent Fiscal Year Audit.</b></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:  See ATTACHMENT a1006b02 for most recent FY Audit.</p>
<b>B.5</b>	<p><b>Progress Report.</b></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. See ATTACHMENT a1006f02 for full progress report.</p>
<b>B.6</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></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. See ATTACHMENT a1006c02.</p>
<b>B.7</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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. See ATTACHMENT a1006e02.</p>
<b>B.8</b>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<b>C.1</b>	<p><b>Capital Improvements.</b> 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 in EPIC on June 3, 2020.</p>





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# FYB 2021

# PHA 5-YEAR PLAN

<b>A.</b>	<b>PHA Information.</b>																																																														
<b>A.1</b>	<p><b>PHA Name:</b> Montgomery Housing Authority <b>PHA Code:</b> <u>AL006</u></p> <p><b>PHA Plan for Fiscal Year Beginning: (MM/YYYY):</b> <u>04/2021</u></p> <p><b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> <b>5-Year Plan Submission</b>      <input type="checkbox"/> <b>Revised 5-Year Plan Submission</b></p> <p><b>Availability of Information.</b> 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.</p> <p><b>The Montgomery Housing Authority (MHA) Annual Plan is provided for public view on our website <a href="http://www.mhatoday.org">www.mhatoday.org</a> and at the following locations:</b></p> <table border="1" style="width:100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th style="width: 20%;">AMP NUMBER</th> <th style="width: 40%;">PROPERTY NAME</th> <th style="width: 40%;">PROPERTY ADDRESS</th> </tr> </thead> <tbody> <tr> <td>Main Office</td> <td>MHA Central Office</td> <td>525 S. Lawrence Street, Montgomery, AL 36104</td> </tr> <tr> <td>AL006000002</td> <td>Parks Place</td> <td>1026 Rosa Parks Avenue Montgomery, AL 36108</td> </tr> <tr> <td>AL006000004</td> <td>Paterson Court</td> <td>609 Winnie Street Montgomery, AL 36104</td> </tr> <tr> <td>AL006000006</td> <td>Gibbs Village East</td> <td>1701 Terminal Road Montgomery, AL 36108</td> </tr> <tr> <td>AL006000007</td> <td>Gibbs Village West</td> <td>2025 Terminal Road Montgomery, AL 36108</td> </tr> <tr> <td>AL006000009</td> <td>The Terrace</td> <td>1301 Adams Avenue Montgomery, AL 36104</td> </tr> <tr> <td>AL006000012</td> <td>The Plaza at Centennial Hill I</td> <td>515 Percy Drive Montgomery, AL 36104</td> </tr> <tr> <td>AL006000013</td> <td>The Plaza at Centennial Hill II</td> <td>515 Percy Drive Montgomery, AL 36104</td> </tr> <tr> <td>AL006000011</td> <td>Victor Tulane Gardens</td> <td>1101 Victor Tulane Cir, Montgomery AL 36104</td> </tr> <tr> <td>AL006000014</td> <td>Columbus Square I</td> <td>645 Columbus Street Montgomery, AL 36104</td> </tr> <tr> <td>AL006000015</td> <td>Columbus Square II</td> <td>645 Columbus Street Montgomery, AL 36104</td> </tr> </tbody> </table> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width:100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	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	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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<b>B.</b>	<b>5-Year Plan.</b> Required for <u>all</u> PHAs completing this form.
<b>B.1</b>	<p><b>Mission.</b> 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><b>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.</b></p> <p>In order to achieve this mission, the MHA will:</p> <ol style="list-style-type: none"> <li><b>1. Neighborhood Transformation</b> 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 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.</li> <li><b>2. Create Administrative Efficiency while Enhancing the Customer Experience</b> 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.</li> <li><b>3. Promote Fair Housing and De-concentration</b> 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 number of underrepresented families in both the Housing Choice Voucher and Public Housing programs.</li> <li><b>4. Economic Self-Sufficiency Opportunities</b> 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 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.</li> <li><b>5. Expand and Improve Affordable Housing</b> 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 when the demolition application was approved by HUD and utilize said 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-used models for future development.</li> <li><b>6. Image Transformation-Anchor the Message – MHA properties are Communities of Choice</b> 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.</li> </ol>

<b>B.2</b>	<p><b>Goals and Objectives.</b> 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. See ATTACHMENT a1006f02.</p>
<b>B.3</b>	<p><b>Progress Report.</b> Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See ATTACHMENT a1006g02.</p>
<b>B.4</b>	<p><b>Violence Against Women Act (VAWA) Goals.</b> 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><i>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.</i></p>
<b>B.5</b>	<p><b>Significant Amendment or Modification.</b> Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p><b>DEFINITION OF “SIGNIFICANT AMENDMENT OR MODIFICATION”</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<b>B.6</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y   N  <input type="checkbox"/>   <input type="checkbox"/></p> <p>(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.</p>
<b>B.7</b>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <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>

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

**ATTACHMENT a1006a02**

# **FYB 2021 PHA PLAN**

## **CIVIL RIGHT CERTIFICATION**

**Certifications of Compliance with  
PHA Plans and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the      5-Year and/or  X  Annual PHA Plan for the PHA fiscal year beginning APRIL 1, 2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Montgomery Housing Authority

AL006

\_\_\_\_\_  
PHA Name

\_\_\_\_\_  
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2021

5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official

Title

Damon E. Duncan

President/CEO

Signature

Date

11-16-2020



**Certifications of Compliance with  
PHA Plans and Related Regulations  
(Standard, Troubled, HCV-Only, and  
High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including  
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the  X  5-Year and/or   Annual PHA Plan for the PHA fiscal year beginning  APRIL 1, 2021 , hereinafter referred to as " the Plan ", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
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22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Montgomery Housing Authority

AL006


PHA Name

PHA Number/HA Code

         Annual PHA Plan for Fiscal Year 20

  X   5-Year PHA Plan for Fiscal Years 2021 - 2025

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802).

Name of Authorized Official	Title
Damon E. Duncan	President/CEO
Signature 	Date <u>12-7-2020</u>

**Civil Rights Certification**  
**(Qualified PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 02/29/2016

**Civil Rights Certification**

**Annual Certification and Board Resolution**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Montgomery Housing Authority

AL006

\_\_\_\_\_  
PHA Name

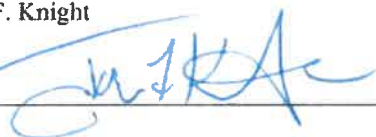
\_\_\_\_\_  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Dr. John F. Knight

Signature



Title

Chairman

Date

12/3/2020



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

**ATTACHMENT a1006b02**

# **FYB 2021 PHA PLAN RECENT AUDIT FINDINGS**

**MONTGOMERY HOUSING AUTHORITY  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
MARCH 31, 2019**

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**SECTION II – FINANCIAL STATEMENT FINDINGS**

None.

**SECTION III – FEDERAL AWARD FINDINGS AND QUESTIONED COSTS**

**Finding 2019-001 Housing Choice Voucher Tenant File Deficiency- Rent Reasonableness  
*Significant Deficiency in Internal Controls***

**Federal Program:** CFDA 14.871 Housing Choice Voucher Program

**Criteria:** The Montgomery Housing Authority (MHA) should perform annual re-certifications of all program participants to ensure that tenant files are maintained in compliance with all underlying HUD standards and requirements. This shall include documentation that a review of the rent being charged for the unit to determine that the rental rate is reasonable.

**Condition:** Our review of forty (40) Housing Choice Voucher Program files revealed that 8 out of 40 files had no evidence that a review of rent reasonableness had been performed.

**Context:** As part of the tenant re-certification process, MHA must compare the Fair Market rent from one year ago to the Fair Market Rent that is in effect 60 days before the contract expires. If the Fair Market Rent decreases by at least five percent compared to the previous year's Fair Market Rent, the unit must be reexamined to determine if the amount that will be paid to the landlord is rent reasonable. Over the last few years, Montgomery MSA rents have not changed by this threshold.

**Cause:** The Authority in conjunction with 2016 streamlining rule changes and attempting to comply with security requirements regarding protection of tenant data gathered as part of the Earned Income Verification process, resident files were purged to remove data that was in excess of 5 years old and as a result, program participants that have leased in place in excess of that term, the original rent reasonableness documentation was not retained in the resident's file.

**Effect:** Failure to maintain adequate documentation in resident's files leads to instances of noncompliance.

**Questioned Costs:** There are no questioned costs related to this finding.

**Auditors' Recommendation:** We recommend that the agency review 100% of files and perform rent reasonableness determinations to ensure that files are complete and in compliance with all HUD requirements. This shall include a review of the unit features and comparables as well as outreach with the landlord to ensure that all rents are appropriate.

**MHA Response:** MHA will review 100% of HCV participant files to ensure that MHA is in compliance with all HUD requirements. Rent reasonableness analysis will be verified, documented, and retained in each participant file.

**MONTGOMERY HOUSING AUTHORITY  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
MARCH 31, 2019**

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**SECTION III – FEDERAL AWARD FINDINGS AND QUESTIONED COSTS (continued)**

**Staff Contact:** MHA’s Lead Housing Specialist will be assigned as coordinator for this task item. Each specialist will be accountable to the Lead Specialist for participants on their respective caseload. Each specialist will be tasked to verify rent reasonableness analysis documentation and file maintenance. 60 days prior to contract anniversary and at the documented request of landlords to increase rent, analyses will be conducted with comparables units established and documented in files for final determinations.

**Target Completion date:** All files will be reviewed and properly documented by January 31, 2020.



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**ATTACHMENT a1006c02**

# **FYB 2021 PHA PLAN RESIDENT ADVISORY BOARD COMMENTS**

**Resident Advisory Board Meeting Agenda  
November 19, 2020  
Conference Call  
9:30 AM**

**Call to Order:** **ROSS Coordinator**

**Prayer:** **RAB Member**

**Occasion:** **RAB Monthly Meeting**

**Opening remarks:** **Mr. Duncan**

**Discussion:** **Old business**  
**2020 PHA Plan**  
**Resident Council Meetings**  
**Community Activities**  
**Trainings & Workshops**  
**Resident Services**

**Comments and Concerns:**

**Adjourn:**



## **Resident Advisory Board Meeting MINUTES: November 19, 2020**

**The meeting was called to order by ROSS Coordinator Dawn Taylor at 9:37AM**

**Attendees were as follows: Dawn Taylor, Alma Golson, Daphne Wright (call in), Damon Duncan, LaTonya Surls, Michaela Bostick, Christalyn Wright, & Chief Finley, MPD.**

- **The meeting was opened with a prayer and opening remarks by Mr. Duncan.**
  - Mr. Duncan shared his concerns about staying safe and healthy during the Thanksgiving break. Also, suggested possibly postponing the meeting for next month due to Christmas.
  
- **ROSS Coordinator (L. Surls) discussed old business:**
  - Addressed monthly webinars.
  - Resuming Resident Council Meetings.
  - Update contact information surveys.
  - Thanksgiving plans
  - Identifying resident's needs
  
- **Interim Director of Human Resources (C. Wright) addressed 2020 PHA Plan:**
  - Mrs. Wright provided an overview of the updates made to the PHA Plan. She asked ROSS Coordinators to email the information to residents and have them submit their questions. This information will also be updated on MHA website.
  - The PHA Plan was emailed to RAB members prior to the meeting for their review.
  
- **ROSS Coordinator (D. Taylor) discussed Resident Council Meetings:**
  - Encouraged RAB members to find creative ways to meet with residents and get feedback (i.e. Video or phone conference, newsletter, etc.). Advised that this will be discussed in more detail at the next meeting since the majority of RAB members were not in attendance.
  
- **ROSS Coordinator (D. Taylor) discussed community activities:**
  - Shared that Ms. Hicks is doing a coat giveaway at Paterson Court this week and working with an organization for assistance. Encouraged RAB Members to find creative ways to host community activities safely.
  - Ms. Golson was experiencing technical difficulties the entire meeting although IT staff Rashad Sims was present. The decision was made to wait until the next RAB meeting to address the items listed on the agenda since members were not present.
  
- **Chief Finley was offered an opportunity to speak:**
  - No comments or concerns, he was present to address any concerns presented by RAB members.

**The Resident Advisory meeting was adjourned at 10:07AM**



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**ATTACHMENT a1006d02**

# **FYB 2021 PHA PLAN PUBLIC COMMENTS**



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

EHO – EOE

DAMON E. DUNCAN  
PRESIDENT/CEO

JOHN F. KNIGHT, JR.  
CHAIRMAN

**PUBLIC NOTICE**  
**MONTGOMERY HOUSING AUTHORITY (MHA)**  
**DRAFT FYB 2021 Annual Plan & 5-Year Plan**  
**and**  
**2021-2025 Five-Year Action Plan**  
**45-day Public Comment Period**

The Montgomery Housing Authority's FYB 2021 Annual & 5-Year Plan and 2021-2025 Five-Year Action plan has been updated and is available for public comments for the next 45 days, commencing on **Wednesday, September 23, 2020 and ending Friday, November 6, 2020.**

The 2021 PHA Plan will be available for review on MHA's website at [www.mhatoday.org](http://www.mhatoday.org). All comments must be made in writing and addressed to Michaela Bostick, Real Estate Development Coordinator, Montgomery Housing Authority, 525 S. Lawrence Street, Montgomery, Alabama 36104. Written comments must be received no later than 12:00 p.m. on Wednesday, December 2, 2020.

A Public Hearing is scheduled **December 2, 2020 at 2:00 P.M.** via GoToMeeting video conference. Information will be available a week prior to the Public Hearing on MHA website.

COMMISSIONERS: PAUL HANKINS, Vice-Chair  
WILLIE DURHAM

FRANK BROWN  
RICHARD E. HANAN

ANDREA R. MOSLEY  
RAY ROTON

ALFRED HOOD  
SAMUEL FRAZIER

Hearing impaired assistance is available in Alabama by dialing 711  
Crime and Fraud hotline – call: 334-206-7111

Re: 2021-2025 Five-Year Action Plan

**PUBLIC NOTICE**  
**MONTGOMERY HOUSING AUTHORITY**  
**(MHA)**  
**DRAFT FYB 2021 Annual Plan & 5-Year**  
**Plan**  
**and**  
**2021-2025 Five-Year Action Plan**  
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The 2021 PHA Plan will be available for review on MHA's website at [www.mha-today.org](http://www.mha-today.org). All comments must be made in writing and addressed to Christalyn Wright, Interim Director of Human Resources, Montgomery Housing Authority, 525 S. Lawrence Street, Montgomery, Alabama 36104. Written comments must be received no later than 12:00 p.m. on Tuesday, November 10, 2020.

A Public Hearing is scheduled November 10, 2020 at 2:00 P.M. via GoToMeeting video conference. Information will be available a week prior to the Public Hearing on MHA's website. Mont. Adv. 10/3, 10/18, 11/1/2020  
0004394214



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

DAMON E. DUNCAN  
PRESIDENT/CEO

EHO – EOE  
JOHN F. KNIGHT, JR  
CHAIRMAN

## NOTICE OF PUBLIC HEARING

TO: Resident Council Presidents  
Mayor of the City of Montgomery  
Montgomery City Council Members  
Stakeholders/Community Partners  
Any other interested groups or organizations

FROM: Damon E. Duncan, President/CEO

SUBJECT: 2020 Annual and Five-Year Plan and Five-Year Action Plan

DATE: November 24, 2020

The Board of Commissioners and I invite you to a Public Hearing on **Wednesday, December 2, 2020** at 2:00 P.M. via GoToMeeting video conference. The link will be available the day of the Public Hearing on our website (please see below).

The Public Hearing is being held to offer an opportunity for public comments, prior to finalizing the Montgomery Housing Authority’s (MHA) 2021 Annual and Five-Year Plan including a Five-Year Action Plan for submission to the U.S. Department of Housing and Urban Development (HUD).

These plans were prepared with input from residents of public housing and are designed to identify and govern the MHA’s current and future administrative, management, development, and residents’ services policies and activities.

The draft plans and supporting documents are available at our Administrative Office at 525 S. Lawrence Street, Montgomery, and on our website at [www.mhatoday.org](http://www.mhatoday.org).

We look forward to seeing you at the public hearing.

cc: Board of Commissioners, MHA  
Department Heads  
Property Managers

COMMISSIONERS: PAUL HANKINS, Vice-Chair WILLIE DURHAM	FRANK BROWN RICHARD E. HANAN	ANDREA R. MOSLEY RAY ROTON	ALFRED HOOD SAMUEL FRAZIER
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**PHA Public Hearing  
2021 Annual and Five-Year Plan  
2021 Five-Year Action Plan**

**December 2, 2020  
Go-To-Meeting  
2:00 p.m.**

**Attendees Present**

<b>Name</b>	<b>Title</b>
Damon Duncan	MHA Chief Executive Officer (CEO)
Terese Walton	MHA Consultant
Glynis Tanner	MHA Chief Operating Officer
Christalyn Wright	MHA Interim Director of Human Resources/Real Estate Development Coordinator
Brandie Townsend	MHA Director of Resident Services
Michaela Bostick	MHA Real Estate Development Coordinator
Felicia Autry	MHA Public Housing Asset Manager
Dekeesha Norman	MHA Assisted Housing Programs Administrator
Dymond Landers	MHA Resident
Stephanie Thompson	Family Guidance
Stephanie Paul	Paul Outreach Services
Shereda Finch	COSA
Cecelia Saunders	



**PHA Public Hearing  
2021 Annual and Five-Year Plan  
2021 Five-Year Action Plan**

**December 2, 2020  
Go-To-Meeting  
2:00 p.m.**

The meeting was called to order at 2:12 pm by Christalyn Wright, Interim Director of Human Resources/Real Estate Development Coordinator. The purpose of the meeting is to provide attendees with updates on the 2020 Annual and Five-Year Plan and the 5-Year Action Plan. All comments will be recorded.

**Attendees Present-**

Damon Duncan, Chief Executive Officer; Terese Walton, Consultant; Glynis Tanner, Chief Operating Officer; Christalyn Wright, Interim Director of Human Resources/Real Estate Development Coordinator; Brandie Townsend, Director of Resident Services; Michaela Bostick, Real Estate Development Coordinator; Felicia Autry, Public Housing Asset Manager; Dekeesha Norman, Assisted Housing Programs Administrator; Dymond Landers, MHA Resident; Stephanie Thompson, Family Guidance; Stephanie Paul, Paul Outreach Services; Shereda Finch, COSA; Cecelia Saunders.

**FYB 2021 ANNUAL PLAN AND 5 YEAR PLAN SUMMARY UPDATES**

**HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN SUMMARY**

Montgomery Housing Authority (MHA) must have a written administrative plan that established local policies for the administration of the Housing Choice Voucher Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the plan to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes.

**11-11.C.**

**Family-Initiated Interim Reexaminations**

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

### ***Required Reporting***

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

#### **MHA Policy**

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. will conduct an interim reexamination to recalculate the new family share of rent and new subsidy amount. If a family with zero income experiences an increase in income, the family must report it within 10 calendar days of the date of the increase.

The MHA will conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.

### **4-111.B. Selection and HCV Funding Sources**

#### **Special Admissions [24 CFR 982.203]**

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit such families whether or not they are on the waiting list, and, if they are on the waiting list, without considering the family's position on the waiting list. These families are considered non-waiting list selections. The PHA must maintain records showing that such families were admitted with special program funding.

#### **Targeted Funding [24 CFR 982.204(e)]**

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

#### **MHA Policy**

If HUD awards MHA program funding that is targeted for families living in specified unities or for other specified families:

- a) MHA must use the assistance for the targeted families.



b) MHA may admit a family that is not on the MHA waiting list, or without considering the family's waiting list position. MHA must maintain records showing that the family was admitted with HUD-targeted assistance.

c) For housing covered by the Low-Income Housing Preservation and Resident Home Ownership Act of 1990 (41 U.S.C. 4101 est seq.);

d) A family residing in a project covered by a project-based HCV HAP contract at or near the end of the HAP contract term;

e) Tenant protection vouchers for foster youth to independence initiative (FYI).

#### **9-I.D. Special Housing Types [24 CFR 982 Subpart M]**

##### **Foster Youth to Independence (FYI) Initiative:**

Tenant Protection Vouchers (TPVs) provided by HUD for youth eligible under the Family Unification Program (FUP), subject to availability.

##### Funding:

a) The HA may request a minimum of one voucher and a maximum of 25 vouchers per Federal Fiscal Year.

b) Voucher(s) will be requested for a specific person(s) qualifying for a FYI voucher.

##### Youth Eligibility:

a) The population eligible to be assisted are youth certified by Alabama Department of Human Resources as meeting the following conditions: Has attained at least 18 years and not more than 24 years of age;

b) Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older; and

c) Is homeless or is at risk of becoming homeless. (\*\*Homeless refers to the population included in the definition of this term at 24 CFR 578.3. At Risk of Becoming Homeless means the population defined as "At Risk of Homelessness" at 24 CFR 576.2\*\*)

**NOTE:** Eligibility is not limited to single persons. For example, pregnant and/or parenting youth are eligible to receive assistance.

##### Youth Referral:

a) Youth must be certified by the Alabama Department of Human Resources as eligible for assistance under this notice and referred to the HA for assistance.

b) The HA must determine eligibility for the HCV program

#### Additional Program Requirements:

a) Turnover: These vouchers “sunset” when the youth leaves the program. This means that the PHA cannot reissue the HCV assistance issued under this notice when the youth exits the HCV program. When the youth exits the HCV program, HUD will reduce the PHA’s HCV assistance to account for the removal of the FYI voucher assistance from the PHA’s HCV baseline inventory.

b) Youth Failure to Use Voucher: Should a youth fail to use the voucher, the PHA must notify HUD, and HUD will reduce the PHA’s HCV assistance to account for the removal of the FYI voucher assistance from the PHA’s HCV baseline inventory.

c) Waiting List Administration: The funding is targeted to a specific person. As a result, the PHA must use the assistance for that person. The PHA may admit the youth that is not on the PHA waiting list, or without considering the family’s waiting list position. The PHA must maintain records showing the family was admitted with HUD-targeted assistance.

d) Length of Assistance: As required by statute, a FYI voucher may only be used to provide housing assistance for you for a maximum of 36 months.

#### **Project-Based Voucher**

#### **17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]**

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA’s whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

#### **MHA Policy**

The PHA will establish waiting lists for individual projects or buildings that are receiving PBV assistance. The PBV project will administer the site-based waiting list. The MHA currently has waiting lists for the following PBV projects:

- The Plaza at Centennial Hills

#### **17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]**

Applicants who will occupy units with PBV assistance must be selected from the PHA’s waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

### **Income Targeting [24 CFR 983.251(c)(6)]**

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

### **Units with Accessibility Features [24 CFR 983.251(c)(7)]**

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

### **Preferences [24 CFR 983.251(d), FR Notice 11/24/08]**

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

### **MHA Policy**

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with supportive services, or mobility impaired persons for accessible units). MHA will select project-based applicants based a working preference having priority over all other preferences. The preferences are for families that qualify for the HCV working preference at the time that they are selected from the Waiting List. To meet the preference, all adult household members must meet one of the following: work at least 30 hours per week; be engaged in MHA approved job training program and/or a full-time student as verified in an accredited education program; or be a person with disabilities or over 62 years of age.

The contract unit leased to each family must be appropriate for the size of the family in accordance with MHA occupancy standards.

## **PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY SUMMARY**

Montgomery Housing Authority (MHA) must have a written Admissions and Continued Occupancy Policy (ACOP) that established local policies for the administration of the Public Housing Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the policy to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes and/or clarification of policies for review and comment.

### **2-II.B. DEFINITION OF REASONABLE ACCOMMODATION**

A “reasonable accommodation” is a change, exception, or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the MHA or result in a “fundamental alteration” in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider’s operations.

#### **Types of Reasonable Accommodations**

When it is reasonable (see definition above and Section 2-II.E), the MHA shall accommodate the needs of a person with disabilities. Examples include but are not limited to:

- Permitting applications and reexaminations to be completed by mail
- Providing “large-print” forms
- Conducting home visits
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability
- Installing a ramp into a dwelling or building
- Installing grab bars in a bathroom
- Installing visual fire alarms for hearing impaired persons
- Allowing a MHA-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space
- Allowing an assistance animal

- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with MHA staff
- Displaying posters and other housing information in locations throughout the MHA's office in such a manner as to be easily readable from a wheelchair

#### **4-III.B. SELECTION METHOD**

MHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the MHA will use.

##### **Local Preferences [24 CFR 960.206]**

MHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the MHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the MHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

##### MHA Policy

The MHA will use the following local preferences:

In order to bring higher income families into public housing, the MHA will establish a preference for “working” families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)].

The MHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who has either been referred by a partnering service agency or consortia or who is seeking an emergency transfer under VAWA from the MHA’s housing choice voucher program or other covered housing program operated by the MHA.

The applicant must certify that the abuser will not reside with the applicant unless the MHA gives prior written approval.

Local preferences will be aggregated using a system in which each preference will receive an allocation of points. The more preference points an applicant has, the higher the applicant’s place on the waiting list.

The preference for victims of domestic violence, dating violence, sexual assault, or stalking seeking an emergency transfer will be equal to two points.

The preference for working families will be equal to one point.

Applicants qualifying for both preferences will thus be assigned a total of three points.

Among applicants who qualify for two preferences, date and time of application will be used to determine placement on the waiting list.

#### **5-I.B. DETERMINING UNIT SIZE**

In selecting a family to occupy a particular unit, the MHA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].

HUD does not specify the number of persons who may live in public housing units of various sizes. MHAs are permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

Although the MHA does determine the size of unit the family qualifies for under the occupancy standards, the MHA does not determine who shares a bedroom/sleeping room.

The MHA's occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

#### MHA Policy

The MHA will use the same occupancy standards for each of its developments.

The MHA's occupancy standards are as follows:

The MHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of different generations will not be required to share a bedroom, except:

A single pregnant woman with no other household members and a single parent with one child and no other household members will be assigned a one-bedroom unit. Assuming no other changes in family composition, after the child reaches the age of 2 years, the family will be eligible for a transfer to a 2-bedroom unit.

Otherwise, an unborn child will not be counted as a person in determining unit size.

Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.

Single person families will be allocated a zero or one bedroom.

Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.

Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the MHA's occupancy standards.

Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.

Children in the process of being adopted will be considered when determining unit size.

Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.

### **5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS**

#### **Types of Exceptions**

#### MHA Policy

The MHA will consider granting exceptions to the occupancy standards at the family's request if the MHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.

When evaluating exception requests the MHA will consider the size and configuration of the unit. In no case will the MHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

To prevent vacancies, the MHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.

## **REAL ESTATE DEVELOPMENT**

### **Development**

- Formulate a comprehensive re-development strategy for Paterson Court
- Move forward with Phase III of Columbus Square w/ previously selected development partner, Gulf Coast Housing Partnership.
- Develop 27 replacement units at the Plaza at Centennial Hill utilizing the Transfer of Assistance from Smiley Court.
- Conduct a "Highest and Best Use" study for Cedar Park, Smiley Court and other vacant land parcels under MHA ownership.

### **Community Development**

- Engage MHA residents in the redevelopment process
- Applied for a Choice Neighborhoods Planning Grant; the property that will be the focus of this grant if awarded is Paterson Court.

## **5-YEAR ACTION PLAN**

Budgets for the next five years were reviewed line-by-line to distinguish between capital funds (not maintenance dollars) and development activities funding. This proposed budget provides general knowledge of the items/areas that will be funded through our Capital Fund Budget Program.

## QUESTIONS

1. Stephanie Thompson: "What are the age requirements for the foster program?"

Glynis Tanner answered: "The child must be at least 18 years old but not older than 24 years old."

2. Stephanie Thompson asked: "Are there income requirements for the foster program?"

Glynis Tanner answered: "There are not income requirements for the Foster Youth to Independence (FYI) program."

No further questions were asked. Meeting was adjourned at 2:31 p.m.





**PHA Public Hearing  
2021 Annual and Five-Year Plan  
2021 Five-Year Action Plan**

**December 7, 2020  
ZOOM virtual meeting  
10:00 a.m.**

**Attendees Present**

<b>Name</b>	<b>Title</b>
Damon Duncan	MHA Chief Executive Officer (CEO)
Terese Walton	MHA Consultant
Glynis Tanner	MHA Chief Operating Officer
Christalyn Wright	MHA Interim Director of Human Resources/Real Estate Development Coordinator
Brandie Townsend	MHA Director of Resident Services
Michaela Bostick	MHA Real Estate Development Coordinator
Felicia Autry	MHA Public Housing Asset Manager
Dekeesha Norman	MHA Assisted Housing Programs Administrator
Sheila Brown	MHA Interim Contracts/Procurement Administrator
Woodrow Hughes	MHA Senior Systems Analyst
Madeline Owens	MHA Comptroller
Dymond Landers	MHA Resident
Christy Lawson	MHA Resident
Shamez Wright	MHA Resident
John Bowman	Hope Inspired Ministries
Benjamin Jones	
Donna Cooper	
Gariesa Gallbreath	
Jon Da'Voe Shelby	



**PHA Public Hearing  
2021 Annual and Five-Year Plan  
2021 Five-Year Action Plan**

**December 7, 2020  
ZOOM virtual meeting  
10:00 a.m.**

The meeting was called to order at 10:00 am by Michaela Bostick, Real Estate Development Coordinator. The purpose of the meeting is to provide attendees with updates on the 2020 Annual and Five-Year Plan and the 5-Year Action Plan. All comments will be recorded.

**Attendees Present-**

Damon Duncan, Chief Executive Officer; Christalyn Wright, Interim Director of Human Resources/Real Estate Development Coordinator; Brandie Townsend, Director of Resident Services; Michaela Bostick, Real Estate Development Coordinator; Felicia Autry, Public Housing Asset Manager; Dekeesha Norman, Assisted Housing Programs Administrator; Sheila Brown, Interim Contracts/Procurement Administrator; Woodrow Hughes, Senior Systems Analyst; Madeline Owens, Comptroller; John Bowman, Hope Inspired Ministries; Dymond Landers; Benjamin Jones; Christy Lawson; Donna Cooper; Gariesa Gallbreath; Shamez Wright; Jon Da'Voe Shelby.

**FYB 2021 ANNUAL PLAN AND 5 YEAR PLAN SUMMARY UPDATES**

**HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN SUMMARY**

Montgomery Housing Authority (MHA) must have a written administrative plan that established local policies for the administration of the Housing Choice Voucher Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the plan to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes.

**11-11.C.**

**Family-Initiated Interim Reexaminations**

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

### ***Required Reporting***

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

#### **MHA Policy**

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. will conduct an interim reexamination to recalculate the new family share of rent and new subsidy amount. If a family with zero income experiences an increase in income, the family must report it within 10 calendar days of the date of the increase.

The MHA will conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.

### **4-111.B. Selection and HCV Funding Sources**

#### **Special Admissions [24 CFR 982.203]**

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit such families whether or not they are on the waiting list, and, if they are on the waiting list, without considering the family's position on the waiting list. These families are considered non-waiting list selections. The PHA must maintain records showing that such families were admitted with special program funding.

#### **Targeted Funding [24 CFR 982.204(e)]**

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

#### **MHA Policy**

If HUD awards MHA program funding that is targeted for families living in specified unities or for other specified families:

- a) MHA must use the assistance for the targeted families.

- b) MHA may admit a family that is not on the MHA waiting list, or without considering the family's waiting list position. MHA must maintain records showing that the family was admitted with HUD-targeted assistance.
- c) For housing covered by the Low-Income Housing Preservation and Resident Home Ownership Act of 1990 (41 U.S.C. 4101 est seq.);
- d) A family residing in a project covered by a project-based HCV HAP contract at or near the end of the HAP contract term;
- e) Tenant protection vouchers for foster youth to independence initiative (FYI).

#### **9-I.D. Special Housing Types [24 CFR 982 Subpart M]**

##### **Foster Youth to Independence (FYI) Initiative:**

Tenant Protection Vouchers (TPVs) provided by HUD for youth eligible under the Family Unification Program (FUP), subject to availability.

##### Funding:

- a) The HA may request a minimum of one voucher and a maximum of 25 vouchers per Federal Fiscal Year.
- b) Voucher(s) will be requested for a specific person(s) qualifying for a FYI voucher.

##### Youth Eligibility:

- a) The population eligible to be assisted are youth certified by Alabama Department of Human Resources as meeting the following conditions: Has attained at least 18 years and not more than 24 years of age;
- b) Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older; and
- c) Is homeless or is at risk of becoming homeless. (\*\*Homeless refers to the population included in the definition of this term at 24 CFR 578.3. At Risk of Becoming Homeless means the population defined as "At Risk of Homelessness" at 24 CFR 576.2\*\*)

**NOTE:** Eligibility is not limited to single persons. For example, pregnant and/or parenting youth are eligible to receive assistance.

##### Youth Referral:

- a) Youth must be certified by the Alabama Department of Human Resources as eligible for assistance under this notice and referred to the HA for assistance.
- b) The HA must determine eligibility for the HCV program

### Additional Program Requirements:

a) Turnover: These vouchers “sunset” when the youth leaves the program. This means that the PHA cannot reissue the HCV assistance issued under this notice when the youth exits the HCV program. When the youth exits the HCV program, HUD will reduce the PHA’s HCV assistance to account for the removal of the FYI voucher assistance from the PHA’s HCV baseline inventory.

b) Youth Failure to Use Voucher: Should a youth fail to use the voucher, the PHA must notify HUD, and HUD will reduce the PHA’s HCV assistance to account for the removal of the FYI voucher assistance from the PHA’s HCV baseline inventory.

c) Waiting List Administration: The funding is targeted to a specific person. As a result, the PHA must use the assistance for that person. The PHA may admit the youth that is not on the PHA waiting list, or without considering the family’s waiting list position. The PHA must maintain records showing the family was admitted with HUD-targeted assistance.

d) Length of Assistance: As required by statute, a FYI voucher may only be used to provide housing assistance for you for a maximum of 36 months.

### **Project-Based Voucher**

#### **17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]**

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA’s whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

#### **MHA Policy**

The PHA will establish waiting lists for individual projects or buildings that are receiving PBV assistance. The PBV project will administer the site-based waiting list. The MHA currently has waiting lists for the following PBV projects:

- The Plaza at Centennial Hills

#### **17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]**

Applicants who will occupy units with PBV assistance must be selected from the PHA’s waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

**Income Targeting [24 CFR 983.251(c)(6)]**

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

**Units with Accessibility Features [24 CFR 983.251(c)(7)]**

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

**Preferences [24 CFR 983.251(d), FR Notice 11/24/08]**

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

**MHA Policy**

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with supportive services, or mobility impaired persons for accessible units). MHA will select project-based applicants based a working preference having priority over all other preferences. The preferences are for families that qualify for the HCV working preference at the time that they are selected from the Waiting List. To meet the preference, all adult household members must meet one of the following: work at least 30 hours per week; be engaged in MHA approved job training program and/or a full-time student as verified in an accredited education program; or be a person with disabilities or over 62 years of age.

The contract unit leased to each family must be appropriate for the size of the family in accordance with MHA occupancy standards.

## **PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY SUMMARY**

Montgomery Housing Authority (MHA) must have a written Admissions and Continued Occupancy Policy (ACOP) that established local policies for the administration of the Public Housing Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the policy to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes and/or clarification of policies for review and comment.

### **2-II.B. DEFINITION OF REASONABLE ACCOMMODATION**

A “reasonable accommodation” is a change, exception, or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the MHA or result in a “fundamental alteration” in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider’s operations.

#### **Types of Reasonable Accommodations**

When it is reasonable (see definition above and Section 2-II.E), the MHA shall accommodate the needs of a person with disabilities. Examples include but are not limited to:

- Permitting applications and reexaminations to be completed by mail
- Providing “large-print” forms
- Conducting home visits
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability
- Installing a ramp into a dwelling or building
- Installing grab bars in a bathroom
- Installing visual fire alarms for hearing impaired persons
- Allowing a MHA-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space
- Allowing an assistance animal

- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with MHA staff
- Displaying posters and other housing information in locations throughout the MHA's office in such a manner as to be easily readable from a wheelchair

#### **4-III.B. SELECTION METHOD**

MHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the MHA will use.

##### **Local Preferences [24 CFR 960.206]**

MHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the MHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the MHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

##### MHA Policy

The MHA will use the following local preferences:

In order to bring higher income families into public housing, the MHA will establish a preference for “working” families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)].

The MHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who has either been referred by a partnering service agency or consortia or who is seeking an emergency transfer under VAWA from the MHA’s housing choice voucher program or other covered housing program operated by the MHA.

The applicant must certify that the abuser will not reside with the applicant unless the MHA gives prior written approval.

Local preferences will be aggregated using a system in which each preference will receive an allocation of points. The more preference points an applicant has, the higher the applicant’s place on the waiting list.

The preference for victims of domestic violence, dating violence, sexual assault, or stalking seeking an emergency transfer will be equal to two points.

The preference for working families will be equal to one point.

Applicants qualifying for both preferences will thus be assigned a total of three points.

Among applicants who qualify for two preferences, date and time of application will be used to determine placement on the waiting list.

#### **5-I.B. DETERMINING UNIT SIZE**

In selecting a family to occupy a particular unit, the MHA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].



HUD does not specify the number of persons who may live in public housing units of various sizes. MHAs are permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

Although the MHA does determine the size of unit the family qualifies for under the occupancy standards, the MHA does not determine who shares a bedroom/sleeping room.

The MHA's occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

#### MHA Policy

The MHA will use the same occupancy standards for each of its developments.

The MHA's occupancy standards are as follows:

The MHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of different generations will not be required to share a bedroom, except:

A single pregnant woman with no other household members and a single parent with one child and no other household members will be assigned a one-bedroom unit. Assuming no other changes in family composition, after the child reaches the age of 2 years, the family will be eligible for a transfer to a 2-bedroom unit.

Otherwise, an unborn child will not be counted as a person in determining unit size.

Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.

Single person families will be allocated a zero or one bedroom.

Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.

Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the MHA's occupancy standards.

Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.

Children in the process of being adopted will be considered when determining unit size.

Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.

### **5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS**

#### **Types of Exceptions**

#### MHA Policy

The MHA will consider granting exceptions to the occupancy standards at the family's request if the MHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.

When evaluating exception requests the MHA will consider the size and configuration of the unit. In no case will the MHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

To prevent vacancies, the MHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.

## **REAL ESTATE DEVELOPMENT**

### **Development**

- Formulate a comprehensive re-development strategy for Paterson Court
- Move forward with Phase III of Columbus Square w/ previously selected development partner, Gulf Coast Housing Partnership.
- Develop 27 replacement units at the Plaza at Centennial Hill utilizing the Transfer of Assistance from Smiley Court.
- Conduct a "Highest and Best Use" study for Cedar Park, Smiley Court and other vacant land parcels under MHA ownership.

### **Community Development**

- Engage MHA residents in the redevelopment process
- Applied for a Choice Neighborhoods Planning Grant; the property that will be the focus of this grant if awarded is Paterson Court.

## **5-YEAR ACTION PLAN**

Budgets for the next five years were reviewed line-by-line to distinguish between capital funds (not maintenance dollars) and development activities funding. This proposed budget provides general knowledge of the items/areas that will be funded through our Capital Fund Budget Program.

## QUESTIONS

1. Shamez Wright asked: "When can we sign up for the Housing Choice Voucher program?"

Dekeesha Norman answered: "Currently right now our Housing Choice Voucher waitlist is currently closed at this time. We do not have a tentative date as to when we will be reopening. We still have approximately 300 applicants waiting to be selected off of our 2018 waitlist; once we do move to opening, there will be a public announcement made about the opening of the waitlist but I can't give a tentative date right now."

2. Shamez Wright asked: "I currently live inside of a 3-bedroom apartment and I have five (5) kids. They told me that I can't move anywhere bigger because I have four (4) girls and just one (1) boy. Their ages are 8 years old, 5 years old, 3 year old, 2 year old, and 1 year old. I have a 3-bedroom apartment in Gibbs Village East."

Felicia Autry answered: "After this meeting, if you can give the admissions department a call and we will address it from there. The number is 206-7130. You'll also need to put in a transfer request through your property manager."

3. Christy Lawson asked: "My son, he's two (2), and also what the lady just asked about; I was requesting for a two bedroom apartment and they said that he had to be five (5)."

Felicia Autry answered: "Under ACOP, have you put in a transfer request also and they told you that?" [Lawson stated that she had just asked the office the question but had not put in any forms or requests.] "Okay, the age if I'm not mistaken is five (5) but I will check that to be sure, but they do have to be a certain age before they can be considered for transfer. Put in your transfer request and your reasons for needing a transfer."

No further questions were asked. Meeting was adjourned at 10:23 a.m.



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

**ATTACHMENT a1006e02**

# **FYB 2021 PHA PLAN**

## **LOCAL OFFICIAL**

## **CERTIFICATION**

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Steven Reed, the Mayor of the City of Montgomery, Alabama  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

The Housing Authority of the City of Montgomery, Alabama  
*PHA Name*

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of  
Impediments (AI) to Fair Housing Choice of the

City of Montgomery, Alabama

*Local Jurisdiction Name*

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated  
Plan and the AI.

In the City of Montgomery 2020-2024 Consolidated Plan, the Comprehensive Housing  
Affordability Strategy (CHAS) data indicates the housing need among rental households with  
incomes below 30% HAMFI with a housing cost burden greater than 50% of their income is 5,208  
households. This overburden group is served through the Montgomery Housing Authority's  
existing public housing inventory, Housing Choice Voucher (HCV) tenant-based vouchers and  
mixed-finance housing development efforts. The Montgomery Housing Authority (MHA) provides  
affordable housing for households at or below 30% of area median income in both the public  
housing and HCV programs while further including income tiers in its development efforts for  
newly constructed mixed-finance communities to help insure that the neediest families are given  
preference in the leasing process. In addition, MHA tenants pay no more than 30% of their adjusted  
household income for the tenant portion of the rent. Therefore, the activities presented in the MHA  
PHA Annual – 5-Year Plan are in alignment and fully consistent with the City of Montgomery  
Consolidated Plan.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will  
pursue false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Steven Reed

Signature

Title

Mayor, City of Montgomery, Alabama

Date

11/24/2021



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

**ATTACHMENT a1006f02**

# **FYB 2021 PHA PLAN GOALS AND OBJECTIVES**

## **FYB 2021 GOALS AND OBJECTIVES**

### **IMPROVE PUBLIC HOUSING**

#### ***Achieve “High Performer” rating under the PHAS:***

##### ***Objectives-***

- Reduce unit turn-around time to 14 days
- Complete emergency work orders within 24 hours, routine work orders within 3 days, ensure UPCS inspection of 100% of dwelling units and systems
- Manage and maintain 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 for dwelling units’ interiors and exteriors
- Upgrade existing security cameras around MHA properties
- Partner with the Montgomery Police Department to increase public patrols and to conduct periodic patrols for safety
- Add a position for the Director of Public Safety who will be the contact point between MHA and the Montgomery Police Department

#### ***Improve customer service and communication between residents, applicants, and agency:***

##### ***Objectives-***

- Improve technology utilization to facilitate communication with residents
- Update website to provide quality communication between residents and agency
- Develop and implement resident communication plan
- Respond to all inquiries the same day they are received
- Continue customer service training
- Develop and 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 in compliance with the MHA’s rent collection policy and HUD requirements

- Ensure that all indicators are performed consistently, according to high-performance criteria
- Establish a quality control on 10% of the units to be done each month
- Ensure that quality control inspections are done on MHA's work order systems each month
- Ensure that quality control on files are being handled on a monthly basis

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

***Objectives-***

- 

***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
- Enhance security equipment at all sites

***Provide staff training opportunities:***

***Objectives-***

- Increase staff capacity and growth potential

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

***Objectives-***

- Maintain an occupancy rate of 95% or better

***Develop translate marketing material in languages, as needed:***

***Objectives-***

- Provide printed documents in Spanish
- Provide language translation on MHA website
- Provide translation option on phone system

***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
- Ensure that maintenance team receives their Certified Manager of Maintenance (CMM) training
- Ensure the public housing management staff receives their Public Housing Management (PHM) certification



***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
- Prioritize the expansion of housing choices in areas of opportunity

***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
- Upgrade Kiosk in main lobby
- Implement telephone tracking system software

### **IMPROVE THE HOUSING CHOICE VOUCHER PROGRAM**

***Achieve “High Performer” rating under SEMAP (or HUD equivalent) program:***

***Objectives-***

- 

***Improve customer service and communication between residents, applicants, and agency:***

***Objectives-***

- Improve technology utilization to facilitate communication with residents
- Respond to all inquiries the same day they are received
- Continue customer service training
- Host landlord meetings and partner with stakeholders
- Develop and implement customer service satisfaction survey

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

***Objectives-***

- Increase participation of under-represented 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

***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-***

- Ensure that units are not placed “on-hold” for more than 120 days
- Ensure that program voucher utilization is at 97% or better

***Reimagine the Housing Choice Voucher (HCV) Program orientation process***

***Objectives-***

- Implement a tenant/landlord orientation video process
- Develop an electronic brochure
- Train MHA internal staff on HCVP orientation video process
- Implement remote certification option
- Adopt policies that will allow two-year re-certifications for families on fixed income and allow remote re-certifications for the program

***Rebrand the Housing Choice Voucher (HCV) Program***

***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

***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

**INCREASE ASSISTED HOUSING CHOICES**

***Objectives-***

- Implement addition of information to the agency's website to better inform and serve tenants of the HCV Department (Portability process, Waitlist information, etc.)
- Acquire additional HUD VASH vouchers to assist local and surrounding areas' homeless Veterans
- Seek opportunities to increase the Housing Choice Voucher portfolio to include mainstream vouchers
- Conduct successful and informational virtual voucher briefings within the HCV Department to ensure that tenants receive information needed to comply with HUD and agency regulations and policies
- Host virtual landlord workshops with current and prospect landlords to promote education about the HCV Program, to include providing updates and program changes that may affect tenants, the agency and landlords

**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
- Develop and implement a full DBE/WBE/MBE plan
- Develop and implement a full Section 3 plan

### **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 HAI 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 retain top talent
- Develop strategies to promote team dynamics, unity and morale

### **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-***

- Reposition/Redevelop non-performing or obsolete assets including but not limited to, Gibbs Village East, Gibbs Village West, and Paterson Court
- 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 develop Phase III of the Plaza at Centennial Hill

***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, Low-Income Housing Tax Credit (LIHTC), Bond financing, 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
- Develop new housing that could include RAD units
- Promote RAD as an opportunity for gap financing for other affordable housing developers as determined expedient

***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 strategy with walkable communities and engaging community spaces on all future MHA developments
- Encourage activities that promote resident advancement and economic independence
- Engage MHA residents in the redevelopment process
- Involve local community stakeholders in the redevelopment process
- Leverage public and private funds for sustainable economic growth

***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

**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 administer '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
- 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

**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 by 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.



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**ATTACHMENT a1006g02**

# **2021 PHA PLAN PROGRESS REPORT**

## 2021 PROGRESS REPORT

### EXPANSION OF SUPPLY (Modernization/Development)

#### *Progress:*

- 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 continues to demolish unsafe structures at Smiley and is exploring redevelopment options off-site.
- MHA has amended existing Smiley Court Demolition Approval to accommodate RAD transfer of assistance.
- MHA has converted the Smiley Court units to RAD.
- MHA partnered with the City of Montgomery on the Envision 2040 (Montgomery Comprehensive Plan) and Analysis of Impediments to Fair Housing Choice activities to ensure affordable housing was included in the plan.

### QUALITY OF ASSISTED HOUSING, INCLUDING 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.
- 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.
- MHA has become an active partner with the Foster Youth to Independence initiative to provide supportive services to at-risk young adults aging out of foster care.
- MHA has partnered with Montgomery Public Schools (MPS) and the Montgomery County District Attorney's Office to provide additional support for youth at risk of being truant.

### **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.
- Installation of kiosk in main lobby to automate services 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.

### **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.
- 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 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 track 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 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
- 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.

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 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.



## SUMMARY OF 5-YR ACTION PLAN (2021-2025)

Budgets for the next five years were reviewed line-by-line to distinguish between capital funds (not maintenance dollars) and development activities funding. This proposed budget provides general knowledge of the items/areas that will be funded through our Capital Fund Budget Program.

Property	Activity	2021	2022	2023	2024	2025
<b>Parks Place</b>						
	Dwelling-Exterior Improvements-roofing	X				
<b>Gibbs Village-East</b>						
	Site Improvements-playground, porches, curb and gutter, lighting, replace mailboxes and landscape	X				
	Interior Dwelling Improvements-countertop, paint, patch, and cabinets	X				X
	Dwelling-Exterior Improvements-roofing					X
	Replace HVAC		X			
	Replacing Floor-LVT	X	X	X	X	
	Replace 40-gallon gas water heater			X		
<b>Gibbs Village-West</b>						
	Site Improvements-playground, porches, curb and gutter, lighting, replace mailboxes and landscape	X				X
	Interior Dwelling Improvements-countertop, paint, patch, and cabinets	X				
	Dwelling-Exterior Improvements-roofing	X				X
	Replace HVAC				X	
	Replacing Floor-LVT	X	X	X	X	
<b>Victor Tulane Gardens</b>						
	Site Improvements-Repair/replace concrete, sidewalk, curbs, and secure handrails, lighting, parking lot resurfacing, paving, and landscape	X		X		X
	Interior Dwelling Improvements-electrical system and trash	X				
	Replace 20 electric water heaters	X				
	Upgrade playground equipment					X
	Replace HVAC				X	



<b>The Terrace</b>						
	Site Improvements- lighting, parking lot paving, fencing, pressure wash and landscape	X				
	Interior Building Improvements- electrical system and trash chute	X				
	Dwelling Improvements - replace dishwashers			X		
	Replace PTAC				X	
<b>Paterson Court</b>						
	Site Improvements- lighting, parking lot paving, fencing, pressure wash and landscape		X			
	Interior Dwelling Improvements- countertop, paint, patch, and cabinets	X	X	X	X	
	Install Ventilation of Gas Furnace and Water Heaters	X				
	Replace PTAC Heat Units					X
	Relocation				X	X
<b>Development Activities</b>						
	Renovating or building to improve overall inventory	X	X	X	X	X
	Community and master planning for various properties	X	X	X		

## **FYB 2021 ANNUAL PLAN AND 5 YEAR PLAN SUMMARY UPDATES**

### **HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN SUMMARY**

Montgomery Housing Authority (MHA) must have a written administrative plan that established local policies for the administration of the Housing Choice Voucher Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the plan to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes.

#### **11-11.C.**

##### **Family-Initiated Interim Reexaminations**

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

##### ***Required Reporting***

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

##### **MHA Policy**

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect. will conduct an interim reexamination to recalculate the new family share of rent and new subsidy amount. If a family with zero income experiences an increase in income, the family must report it within 10 calendar days of the date of the increase.

The MHA will conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.

#### **4-111.B. Selection and HCV Funding Sources**

### **Special Admissions [24 CFR 982.203]**

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit such families whether or not they are on the waiting list, and, if they are on the waiting list, without considering the family's position on the waiting list. These families are considered non-waiting list selections. The PHA must maintain records showing that such families were admitted with special program funding.

### **Targeted Funding [24 CFR 982.204(e)]**

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

#### **MHA Policy**

If HUD awards MHA program funding that is targeted for families living in specified unities or for other specified families:

- a) MHA must use the assistance for the targeted families.
- b) MHA may admit a family that is not on the MHA waiting list, or without considering the family's waiting list position. MHA must maintain records showing that the family was admitted with HUD-targeted assistance.
- c) For housing covered by the Low-Income Housing Preservation and Resident Home Ownership Act of 1990 (41 U.S.C. 4101 est seq.);
- d) A family residing in a project covered by a project-based HCV HAP contract at or near the end of the HAP contract term;
- e) Tenant protection vouchers for foster youth to independence initiative (FYI).

### **9-I.D. Special Housing Types [24 CFR 982 Subpart M]**

#### **Foster Youth to Independence (FYI) Initiative:**

Tenant Protection Vouchers (TPVs) provided by HUD for youth eligible under the Family Unification Program (FUP), subject to availability.

#### **Funding:**

- a) The HA may request a minimum of one voucher and a maximum of 25 vouchers per Federal Fiscal Year.

b) Voucher(s) will be requested for a specific person(s) qualifying for a FYI voucher.

Youth Eligibility:

a) The population eligible to be assisted are youth certified by Alabama Department of Human Resources as meeting the following conditions: Has attained at least 18 years and not more than 24 years of age;

b) Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older; and

c) Is homeless or is at risk of becoming homeless. (\*\*Homeless refers to the population included in the definition of this term at 24 CFR 578.3. At Risk of Becoming Homeless means the population defined as "At Risk of Homelessness" at 24 CFR 576.2\*\*)

**NOTE:** Eligibility is not limited to single persons. For example, pregnant and/or parenting youth are eligible to receive assistance.

Youth Referral:

a) Youth must be certified by the Alabama Department of Human Resources as eligible for assistance under this notice and referred to the HA for assistance.

b) The HA must determine eligibility for the HCV program

Additional Program Requirements:

a) Turnover: These vouchers "sunset" when the youth leaves the program. This means that the PHA cannot reissue the HCV assistance issued under this notice when the youth exits the HCV program. When the youth exits the HCV program, HUD will reduce the PHA's HCV assistance to account for the removal of the FYI voucher assistance from the PHA's HCV baseline inventory.

b) Youth Failure to Use Voucher: Should a youth fail to use the voucher, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI voucher assistance from the PHA's HCV baseline inventory.

c) Waiting List Administration: The funding is targeted to a specific person. As a result, the PHA must use the assistance for that person. The PHA may admit the youth that is not on the PHA waiting list, or without considering the family's waiting list position. The PHA must maintain records showing the family was admitted with HUD-targeted assistance.

d) Length of Assistance: As required by statute, a FYI voucher may only be used to provide housing assistance for you for a maximum of 36 months.

**Project-Based Voucher**

### **17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]**

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

#### **MHA Policy**

The PHA will establish waiting lists for individual projects or buildings that are receiving PBV assistance. The PBV project will administer the site-based waiting list. The MHA currently has waiting lists for the following PBV projects:

- The Plaza at Centennial Hills

### **17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]**

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

#### **Income Targeting [24 CFR 983.251(c)(6)]**

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

#### **Units with Accessibility Features [24 CFR 983.251(c)(7)]**

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

#### **Preferences [24 CFR 983.251(d), FR Notice 11/24/08]**

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that

preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

### **MHA Policy**

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with supportive services, or mobility impaired persons for accessible units). MHA will select project-based applicants based a working preference having priority over all other preferences. The preferences are for families that qualify for the HCV working preference at the time that they are selected from the Waiting List. To meet the preference, all adult household members must meet one of the following: work at least 30 hours per week; be engaged in MHA approved job training program and/or a full-time student as verified in an accredited education program; or be a person with disabilities or over 62 years of age.

The contract unit leased to each family must be appropriate for the size of the family in accordance with MHA occupancy standards.

### **PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY SUMMARY**

Montgomery Housing Authority (MHA) must have a written Admissions and Continued Occupancy Policy (ACOP) that established local policies for the administration of the Public Housing Program that is up-to-date with HUD Regulations and Federal Statutes. On an annual or an as-needed basis, MHA revisits the policy to include current language to address MHA policies or programs. Montgomery Housing Authority is submitting the following updates and changes and/or clarification of policies for review and comment.

#### **2-II.B. DEFINITION OF REASONABLE ACCOMMODATION**

A "reasonable accommodation" is a change, exception, or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the MHA or result in a

“fundamental alteration” in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider’s operations.

### **Types of Reasonable Accommodations**

When it is reasonable (see definition above and Section 2-II.E), the MHA shall accommodate the needs of a person with disabilities. Examples include but are not limited to:

- Permitting applications and reexaminations to be completed by mail
- Providing “large-print” forms
- Conducting home visits
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability
- Installing a ramp into a dwelling or building
- Installing grab bars in a bathroom
- Installing visual fire alarms for hearing impaired persons
- Allowing a MHA-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space
- Allowing an assistance animal
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with MHA staff
- Displaying posters and other housing information in locations throughout the MHA's office in such a manner as to be easily readable from a wheelchair

### **4-III.B. SELECTION METHOD**

MHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the MHA will use.

#### **Local Preferences [24 CFR 960.206]**

MHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the MHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the MHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

#### MHA Policy

The MHA will use the following local preferences:

In order to bring higher income families into public housing, the MHA will establish a preference for “working” families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR 960.206(b)(2)].

The MHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who has either been referred by a partnering service agency or consortia or who is seeking an emergency transfer under VAWA from the MHA’s housing choice voucher program or other covered housing program operated by the MHA.

The applicant must certify that the abuser will not reside with the applicant unless the MHA gives prior written approval.

Local preferences will be aggregated using a system in which each preference will receive an allocation of points. The more preference points an applicant has, the higher the applicant’s place on the waiting list.

The preference for victims of domestic violence, dating violence, sexual assault, or stalking seeking an emergency transfer will be equal to two points.

The preference for working families will be equal to one point.

Applicants qualifying for both preferences will thus be assigned a total of three points.

Among applicants who qualify for two preferences, date and time of application will be used to determine placement on the waiting list.

#### **5-I.B. DETERMINING UNIT SIZE**

In selecting a family to occupy a particular unit, the MHA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].

HUD does not specify the number of persons who may live in public housing units of various sizes. MHAs are permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

Although the MHA does determine the size of unit the family qualifies for under the occupancy standards, the MHA does not determine who shares a bedroom/sleeping room.

The MHA’s occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

##### MHA Policy

The MHA will use the same occupancy standards for each of its developments.

The MHA’s occupancy standards are as follows:

The MHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of different generations will not be required to share a bedroom, except:



A single pregnant woman with no other household members and a single parent with one child and no other household members will be assigned a one-bedroom unit. Assuming no other changes in family composition, after the child reaches the age of 2 years, the family will be eligible for a transfer to a 2-bedroom unit.

Otherwise, an unborn child will not be counted as a person in determining unit size.

Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.

Single person families will be allocated a zero or one bedroom.

Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.

Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the MHA's occupancy standards.

Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.

Children in the process of being adopted will be considered when determining unit size.

Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.

#### **5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS**

##### **Types of Exceptions**

###### MHA Policy

The MHA will consider granting exceptions to the occupancy standards at the family's request if the MHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.

When evaluating exception requests the MHA will consider the size and configuration of the unit. In no case will the MHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

To prevent vacancies, the MHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.

## **REAL ESTATE DEVELOPMENT**

### **Development**

- Formulate a comprehensive re-development strategy for Paterson Court
- Move forward with Phase III of Columbus Square w/ previously selected development partner, Gulf Coast Housing Partnership.
- Develop 27 replacement units at the Plaza at Centennial Hill utilizing the Transfer of Assistance from Smiley Court.
- Conduct a "Highest and Best Use" study for Cedar Park, Smiley Court and other vacant land parcels under MHA ownership.

### **Community Development**

- Engage MHA residents in the redevelopment process
- Applied for a Choice Neighborhoods Planning Grant; the property that will be the focus of this grant if awarded is Paterson Court.