5-Y	ear PHA Pla	n		nt of Housing and Ur	ban		0. 2577-0226
for	· All PHAs)		Development Office of Public	and Indian Housing	ξ	Expire	es 03/31/2024
	Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families. Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.						
L	PHA Informa	tion.					
	PHA Name: Metropolitan Development and Housing Agency PHA Code: TN005 PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2024 PHA Submission Type: 5-Year Plan Submission Revised 5-Year Plan Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. ■ Administrative Office − 701 S. 6 th Street, Nashville, TN 37206 □ PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below)						
	Participating PHA Program(s) in Programs Not in No. of Units in the Consortia Each Program						
					PH	HCV	-
	Lead HA:						
						_	

- **B** Plan Elements. Required for all PHAs completing this form
- **B.1 Mission.** State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.

In addition, there are over 5,639 households who reside in MDHA-owned housing which had originally been built as public housing under Section 9 of the Housing Act. All of this inventory has been converted to Project Based Rental Assistance under the RAD program. MDHA is implementing its Transformation Plans formerly "Envision" for this housing with the purpose of deconcentrating very low-income families by demolishing the existing units and replacing the same number of subsidized units in higher density mixed-income housing, bringing significant percentages ow workforce and market-rate residents into the communities and bringing in various amenities which will help to ensure the long-term viability of those communities. While MDHA has already transitioned all of its legal public housing inventory to PBRA, MDHA has a remaining allocation of approximately 997 Faircloth Amendment units which it intends to utilize by further development of mixed-income housing. The development of these mixed-income communities (including both the PBRA converted units and the proposed Faircloth Amendment units) will be financed through combinations of 9% and 4% Low Income Housing Tax Credits, bank financing, FHA-insured loans, MDHA equity, financial assistance from the Metropolitan Government, grant assistance from the state and federal housing trust fund.

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

GOAL #1: INCREASE THE SUPPLY OF MDHA-OWNED HOUSING

MDHA established the following objectives to strive in meeting goal #1

- Utilize remaining capacity (approximately 997 units) under the Faircloth Amendment to increase the number of public housing units (which will later be converted to Project-Based Rental Assistance).
- Utilize various forms of financial assistance (grants, loans, contributions, MDHA equity, etc.) to construct workforce and market-rate housing in conjunction with subsidized housing being development so as to deconcentrate poverty.

GOAL #2: INCREASE AND IMPROVE THE SUPPLY OF AND ACCESS TO HOUSING CHOICE VOUCHERS

MDHA established the following objectives to strive in meeting goal #2:

- Apply for replacement vouchers that become available as owners opt-out of Section 8 Project-Based assistance or any other voucher assistance that is made available and is suitable for MDHA.
- Maximize utilization by maintaining a utilization rate of at least 99% annually.

B.2 • Conduct at least three landlord meetings per year.

- Attract at least 40 new property owners to the Housing Choice Voucher program each year.
- Increase the percentage of vouchers leased in non-impacted census tracts from 69% to 72%.
- Have at least three Housing Choice Voucher clients graduate to homeownership each year.
- Explore ways to fund and expand landlord incentive program for VASH participants to apply to other program participants.
- Maintain a SEMAP score of 97 or higher.
- In Rental Assistance, conduct staff meetings addressing quality control issues at least monthly.
- Conduct a Housing Choice Voucher program participant survey biennially.

PHA GOAL #3: SUSTAIN VIABLE COMMUNITIES AND THE URBAN CORE

MDHA established the following objectives to strive in meeting goal #3

- Increase and maintain the number of Family Self-Sufficiency Voucher households to 150 participants.
- Establish three new partnerships annually with agencies that promote aspects of family self-sufficiency (homeownership, budget management, career development, job training and readiness, etc.)
- Working with new and existing partners, provide at least four sessions annually that focus on job training, job readiness, and employability.

PHA GOAL #4: PURSUE THE BEST HOUSING AND BUSINESS PRACTICES

MDHA established the following objectives to strive in meeting goal #4

- Improve the quality and capability of Agency staff in all areas. Identify specific training needs for staff and develop a training schedule.
- Integrate programs and staff from other Agency departments in housing initiatives, including Transformation Plans formerly "Envision".
- Seek ways to further automate processes, digitalize forms and files.

Progress Statements. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Mission

The mission of MDHA is to provide federal housing subsidy assistance to low-income families through a variety of financing mechanisms. For many households, this will involve Housing Choice Vouchers or VASH vouchers, where the recipients can select the housing of their choice. In addition, there are over 5,639 households who reside in MDHA-owned housing which had originally been built as public housing under Section 9 of the Housing Act. All of this inventory has been converted to Project Based Rental Assistance under the RAD program. MDHA is implementing its Transformation Plans formerly "Envision" for this housing with the purpose of deconcentrating the concentration of very low-income families by demolishing the existing units and replacing the same number of subsidized units in higher density mixed-income housing, bringing significant percentages ow workforce and market-rate residents into the communities and bringing in various amenities which will help to ensure the long-term viability of those communities. While MDHA has already transitioned all of its legal public housing inventory to PBRA, MDHA has a remaining allocation of approximately 997 Faircloth Amendment units which it intends to utilize by further development of mixed-income housing. The development of these mixed-income communities (including both the PBRA converted units and the proposed Faircloth Amendment units) will be financed through combinations of 9% and 4% Low Income Housing Tax Credits, bank financing, FHA-insured loans, MDHA equity, financial assistance from the Metropolitan Government, grant assistance from the state and federal housing trust fund.

Goals/Objectives

GOAL #1: INCREASE THE SUPPLY OF MDHA-OWNED HOUSING

MDHA established the following objectives to strive in meeting goal #1

- Utilize remaining capacity (approximately 997 units) under the Faircloth Amendment to increase the number of public housing units (which will later be converted to Project-Based Rental Assistance).
- Utilize various forms of financial assistance (grants, loans, contributions, MDHA equity, etc.) to construct workforce and market-rate housing in conjunction with subsidized housing being development so as to deconcentrate poverty.

Progress Statement:

In 2023, MDHA began vertical construction on Cherry Oak Apartments. This 96-unit development includes 45 PBRA assisted units replace outdated Cayce Place units, 8 new affordable units, 6 workforce units, and 37 market rate units. It is expected to be completed in Spring 2024.

B.3 MDHA broke ground on 5th & Summer. This 107-unit development includes 10 PBRA assisted units replace outdated Cayce Place units, 56 new affordable units, and 41 market rate units. It is expected to be completed in Fall 2025.

MDHA continues to evaluate opportunities to utilize Faircloth Amendment authority to add to its subsidized housing inventory through new development and/or acquisition of appropriate units.

GOAL #2: INCREASE AND IMPROVE THE SUPPLY OF AND ACCESS TO HOUSING CHOICE VOUCHERS

MDHA established the following objectives to strive in meeting goal #2:

- Apply for replacement vouchers that become available as owners opt-out of Section 8 Project-Based assistance or any other voucher assistance that is made available and is suitable for MDHA.
- Maximize utilization by maintaining a utilization rate of at least 99% annually.
- Conduct at least three landlord meetings per year.
- Attract at least 40 new property owners to the Housing Choice Voucher program each year.
- Increase the percentage of vouchers leased in non-impacted census tracts from 69% to 72%.
- Have at least three Housing Choice Voucher clients graduate to homeownership each year.
- Explore ways to fund and expand landlord incentive program for VASH participants to apply to other program participants.
- Maintain a SEMAP score of 97 or higher.
- In Rental Assistance, conduct staff meetings addressing quality control issues at least quarterly.
- Conduct a Housing Choice Voucher program participant survey biennially.
- Increase the project-based voucher PBV program cap from the currently Board approved 900.

Progress Statement:

MDHA utilized 99% of HUD funding provided for the FY ending 9/30/2023. To date, two landlord briefings have been conducted with both in person and virtual attendance options. There are two meetings/briefings planned for remaining quarters of the year. 103 new landlords were added in 2023. There have been seven participants who graduated to homeownership in 2023; along with 17 participants who have graduated from homeownership classes. It can be anticipated that we will meet the goal of three for 2024 for homeownership.

MDHA has collaborated with Low Barrier Housing Collective of Nashville, TN which provided services such as incentives for landlords in the areas of VASH and special programs in 2023. Presently, 91 landlords have taken advantage of this service. Our SEMAP score for the 2023 fiscal year is 100. Rental Assistance conducts monthly staff meetings

B.3 addressing quality control issues with an emphasis on training and education to help improve any quality control findings. In 2023; a Housing Choice Voucher participant survey was conducted in which 676 responses were received from participants. Our PBV voucher cap was broadened from 900 to 1400.

PHA GOAL #3: SUSTAIN VIABLE COMMUNITIES AND THE URBAN CORE

MDHA established the following objectives to strive in meeting goal #3

- Increase and maintain the number of Family Self-Sufficiency Voucher households to 150 participants.
- Establish three new partnerships annually with agencies that promote aspects of family self-sufficiency (homeownership, budget management, career development, job training and readiness, etc.)
- Working with new and existing partners, provide at least four sessions annually that focus on job training, job readiness, and employability.

Progress Statement:

The HCV program has a total of 147 participants enrolled in the FSS program. The RAD converted sites have a total of 78 participants in the FSS program. Several new Social Services partnerships formed for the purpose of promoting aspects of family self-sufficiency. A few of the most valuable partnerships established during this reporting year were with the following organizations:

Regions Bank Group- Financial Counseling, Down payment assistance, Home equity and Mortgage programs/Internships

Wilson Bank and Trust-Home mortgage loans, Financial Planning and 1st Time Homebuyers Loans

Nashville State Community College- Career Advancement, Business and Industry Training and Cooperative Education (Co-op)

Goodwill Industries- Comprehensive job training, Educational Initiatives and Career Opportunities

Additional new partnerships include Corner to Corner and You Can Make It along with the following banks: 5th 3rd, Regions and Ascend to promote the aspects of family self-sufficiency.

MDHA held many events and activities that were designed to increase and enhance employability skills of residents were held over this reporting period. Events and activities included but were not limited to: On-site Job Fairs, Resource Fairs, employability training by the mobile Career Coach Bus and workshops designed to increase marketability and as well as job readiness. MDHA also participated in programs through NACA, the Martha O'Bryan Center, and the Metro Action Commission.

B.3 PHA GOAL #4: PURSUE THE BEST HOUSING AND BUSINESS PRACTICES

MDHA established the following objectives to strive in meeting goal #4

- Improve the quality and capability of Agency staff in all areas. In the first year, identify specific training needs for staff and develop a training schedule for the remaining 4 years for the department.
- Integrate programs and staff from other Agency departments in housing initiatives, including *Transformation Plans formerly "Envision"*.
- Seek ways to further automate processes, digitalize forms and files.

PHA changed the 1st bullet above and deleted the 2nd bullet.

- Integrate programs and staff from other Agency departments in housing initiatives, including RAD and Envision Cayce.
- Apply for Moving to Work designation should the opportunity arise.

Progress Statement:

Our training needs have been identified based on quality control reviews, administrative errors and staff suggestions. The training schedule has been developed with flexibility to address any areas that may arise. Within 6 months of hire, our new specialist attends a Nan McKay HCV class to include a test to obtain that certification. Along with Nan McKay we utilize Nelrod, Association for Talent Development, HUD-Exchange Webinars, Knowledge Wave and Yardi's sources such as the Client Central database, Homeless Training-De-escalation. In addition, the CCD program staff has been trained by MEF & Associates and 1st PIC.

Our inhouse training covers areas such as Violence Against Women's Act, CCD Program, reasonable accommodation, administrative professional assistant training, along with policies and procedures pertaining to operations. Our focus for 2024 has been on the new regulations that HUD has required to be implemented which includes NSpire and HOTMA.

Our most utilized HUD forms are available on the website, and we encourage usage. Rent Cafe is being utilized for online automation for enrollment of the waitlist, application, recertification, interim and the landlord portal. Assistance is provided for landlords and participants utilizing the tools and resources upon request.

	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goactivities objectives, policies, or programs that will enable the PHA to serve the needs of characteristics.
	and adult victims of domestic violence, dating violence, sexual assault, or stalking.
	The Violence Against Women Reauthorization Act, (VAWA) provides that "criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking, engaged in a member of a tenant's household or any guest or other person under the tenant's control shall not be a cause for termination of assistance, tenancy, or occupancy rights if the tenant or an affiliated individual of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, sexual assault or stalking."
	MDHA Rental Assistance notified all program participants of their rights under VAWA in September 2017 and has continued to do so since by providing applicants and participants wit the VAWA "Notice of Occupancy Rights under the Violence Against Women Act" - (form HUD -5380) when an eligibility determination is made for an applicant family and during the annual recertification and/or any notice of termination for a participating family.
	We have updated our administrative plan to include policies and procedures related to require victim documentation, terminating the assistance of a domestic violence perpetrator and emergency moves.
	All information provided to MDHA regarding domestic violence, dating violence, or stalking including the fact that an individual is a victim of such violence or stalking, must be retained confidence and may neither be entered into any shared data base nor provided to any related entexcept to the extent that the disclosure (a) is requested or consented to by the individual in writing (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law
ì	

C.	Other Document and/or Certification Requirements.
C.1	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.
	Substantial Deviation/ Significant Amendment/Modification
	In general, MDHA has adopted the "safe harbor" working definition for significant amendments and substantial deviations/modifications to the Plan as they were contained in Notice PIH 99-51, the definition would include the following:
	 Changes to rent or admissions policies or organization of the waiting list; Additions of non-emergency work items (items not included in the current Annual Statement or Five-Year Action Plan) or change in the use of replacement reserve funds under the Capital Fund; Any change with regard to demolition or disposition, designation, homeownership
	programs or conversion activities.
	MDHA would not consider changes in program funding levels (differences between estimated grant amount and actual allocations), decisions whether or not to apply for additional discretionary grants, or initiation of changes in administrative policies which would not go into effect until a subsequent Plan year to be substantial deviations of modifications. In addition, considering the prospect of significant reductions in Federal funding for housing programs, any changes in operating policies and procedures needed to accommodate the reduced funding will not be considered a significant amendment or substantial deviation modification. MDHA would also exclude from substantial deviation/modification those changes in rents, policies or procedures mandated by Congressional action.
C.2	Resident Advisory Board (RAB Comments.
	(a) Did the RAB(s) provide comments to the 5-Year PHA Plan? (See attachment tn005a01)
	Y N
	(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>N/A</i>
C.3	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the

Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C .4	Required Submission of HUD FO Review
	(a) Did the public challenge any elements of the Plan?
	Y N N
	(b) If yes, include Challenged Elements. <i>N/A</i>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	Affirmatively Furthering Fair Housing (AFFH). (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)
	Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. <i>N/A</i>

Annual PHA Plan
(Standard PHAs and
Troubled PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 03/31/2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs.** PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) *High-Performer PHA* A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a higher performer on <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) *Housing Choice Voucher (HCV) Only PHA* A PHA that administers more the 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) *Troubled PHA* A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent
- (6) *Qualified PHA* A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

PHA Inventory (Number of Publi Number of Hous Fotal Combined	scal Year (Based on A ic Housin sing Choice	Beginning: (MM/ Annual Contributions g (PH) Units: 75	oled PHA YYYY): <u>10/2024</u> s Contract (ACC) units	s at time o	f FY beginning	
PHA Inventory (Number of Publi Number of Hous Fotal Combined	(Based on A ic Housin sing Choice	Annual Contributions g (PH) Units: 75		s at time o	f FY beginning	
Number of Hous Fotal Combined	sing Choic					abo
Fotal Combined		ce valicheriet vi	3)• 7944			
	Units/Vo		9). <u>1944</u>			
PHA Submission	ı Type: 🛭	Annual Submissi	on Revised Ann	ual Subm	ission	
The following ar Annual PHA Plan Plan Elements, an available for insperience of the property of the following ar Annual PHA Pla Additional PHA Pla	A must id and all information by Asset Man y encourage or provide the spector.	lentify the specific I rmation relevant to the public. At a minagement Project (A ged to post complet each resident councerfic locations when we Office – 701 S. 6	ocation(s) where the the public hearing at nimum, PHAs must MP) and main office PHA Plans on their a copy of their PH re the public may of the Street, Nashville,	proposed nd proposed post PHA e or central A Plans btain cop	d PHA Plan, Plan and PHA Plan and Plans, include all office of the website. PHA plans of the 202	PHA are ling e PH As a
Participating PHA Program(s) in Programs Not in No. of Units in						
	Couc	the Consortia	the Consortia	PH	HCV	
Lead HA:						
t F a	the public. A PH. Plan Elements, an available for inspendent of the public of the publ	the public. A PHA must id Plan Elements, and all information available for inspection by updates, at each Asset Man PHAs are strongly encouraged to provide also encouraged to provide The following are the special PHA Plan: Administrative PHA Consortia: (Chec Participating PHA Code	Plan Elements, and all information relevant to available for inspection by the public. At a minupdates, at each Asset Management Project (APHAs are strongly encouraged to post complete also encouraged to provide each resident countries. The following are the specific locations whe Annual PHA Plan: Administrative Office – 701 S. 6 PHA Consortia: (Check box if submitting PHA Code the Consortia)	the public. A PHA must identify the specific location(s) where the Plan Elements, and all information relevant to the public hearing as available for inspection by the public. At a minimum, PHAs must updates, at each Asset Management Project (AMP) and main office PHAs are strongly encouraged to post complete PHA Plans on their also encouraged to provide each resident council a copy of their PHA Flans: The following are the specific locations where the public may of Annual PHA Plan: Administrative Office – 701 S. 6th Street, Nashville, PHA Consortia: (Check box if submitting a joint PHA Plan and Phas Phas Program(s) in the Consortia the Consortia	The following are the specific locations where the public may obtain copy and PHA Plan: Administrative Office – 701 S. 6th Street, Nashville, TN 3720 PHA Consortia: (Check box if submitting a joint PHA Plan and complete PHA Plans PHAS are code the Consortia PHA Plans Phas Code the Consortia PHA Plans Program(s) in the Consortia PHA	■ Administrative Office – 701 S. 6 th Street, Nashville, TN 37206 PHA Consortia: (Check box if submitting a joint PHA Plan and complete table below Participating PHA Program(s) in Programs Not in the Consortia Each Program PHAS Code the Consortia PH HCV

Plan Elements
Revision of Existing PHA Plan Elements.
(a) Have the following PHA Plan elements been revised by the PHA?
Y N Statement of Housing Needs and Strategy for Addressing Housing Needs Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Operation and Management. Grievance Procedures. Homeownership Programs. Community Service and Self-Sufficiency Programs. Safety and Crime Prevention. Pet Policy. Asset Management. Substantial Deviation. Significant Amendment/Modification
(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
Statement of Housing Needs and Strategy for Addressing Housing Needs
Statement of Housing Needs:
Waiting List for Section 8:
Total: 6551 Families with children: 3271-50% Elderly Families: 321-5% Families with Disabilities: 1109-17% White: 850-13% Black/African American: 5279-81% American Indian/Alaska Native: 19-0.29% Asian: 14-0.21% Native Hawaiian/Other Pacific Islander: 6-0.09% Hispanic: 174-3%
The waiting list has been closed for 55 months. The PHA does not plan to reopen the list in the Plan Year.

B.1 Strategies for Addressing Housing Needs

Need: Shortage of affordable housing for all eligible populations

PHA shall maximize the number of affordable units available to the PHA within its current resources by:

- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

PHA shall increase the number of affordable units available to the PHA within its current resources by:

- Apply for additional Section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed-finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance

Need: Specific Family Types: Families at or below 30% of median

PHA shall target available assistance to families at or below 30% of AMI by:

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Adopt policies to support and encourage work

Need: Specific Family Types: Families at or below 50% of median

PHA shall target available assistance to families at or below 50% of AMI by:

- Employ admissions preferences aimed at families who are working
- Adopt policies to support and encourage work

Need: Specific Family Types: The Elderly

PHA shall target available assistance to the elderly by:

 Apply for special-purpose vouchers targeted to the elderly, should they become available

B.1 Need: Specific Family Types: Families with Disabilities

PHA shall target available assistance to Families with Disabilities by:

- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

PHA will increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by:

 Affirmatively market to races/ethnicities shown to have disproportionate housing needs

PHA will conduct activities to affirmatively further fair housing by:

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.
- Market the Section 8 program to owners outside areas of poverty/minority concentrations

Reason for Selecting Strategies:

- Funding constraints
- Staffing constraints
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence on the housing market on PHA programs
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions

Public Housing: N/A

Section 8:

Eligibility

Equal Access

The term "family" includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

(1) A single person, who may be an elderly person, displaced person, disabled person, nearelderly person or any other single person; or

B.1	 (2) A group of persons residing together and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (ii) An elderly family; (iii) A near-elderly family; (iv) A disabled family; (v) A displaced family; and
	(vi) The remaining member of a tenant family.
	Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.
	Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.
	Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.
	Sexual orientation means homosexuality, heterosexuality or bisexuality.
	Gender identity means actual or perceived gender-related characteristics.

B.1 Financial Resources

Sources Planned \$ Planned Uses		cial Resources: Sources and Uses	
a) Public Housing Operating Fund b) Public Housing Capital Fund c) HOPE VI Revitalization d) HOPE VI Demolition e) Annual Contributions for Section 8 Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance 2,300,000.00 Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Community Health Worker Program Community Health Worker Program Low Income Energy Assistance Program 20,000.00 2023 Capital Fund 290,000.00 Public housing operation 153,217.00 Public housing operation 155,500,000.00 Public housing operation Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Public housing operation			Planned Uses
a) Public Housing Operating Fund b) Public Housing Capital Fund 155,000.00 c) HOPE VI Revitalization d) HOPE VI Demolition 73,650,000.00 c) HOPE VI Revitalization d) HOPE VI Demolition 73,650,000.00 c) HOPE VI Demolition 73,650,000.00 c) Public Housing Operating VI Revitalization d) HOPE VI Demolition 73,650,000.00 c) Public housing operatior Other Market Rate Rental Income Public housing operatior Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Public housing operatior Other Market Rate Rental and Commercial Leasing 5. Non-federal Sources (list below) Public housing operatior of Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Public housing operatior of Public housing operatior Public housing op	1. Federal Grants (FY 2024 grants)		
b) Public Housing Capital Fund c) HOPE VI Revitalization d) HOPE VI Demolition c) Annual Contributions for Section 8 Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Community-Based Crime Reduction Emergency Shelter Grants Program Low Income Energy Assistance Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2. Public Housing Dwelling Rental Income 3. Public Housing Dwelling Rental Income 4. Other income (list below) PIDE ASSISTANCE PROGRAM PUBLIC Housing Operation 2. Prior Year Federal Grants (unobligated funds only) (list below) PIDE ASSISTANCE PROGRAM PIDE ASSISTANCE PROGRAM PUBLIC HOUSING OPERATION PUBLIC HOUSI		429,163.00	
c) HOPE VI Revitalization d) HOPE VI Demolition 73,650,000.00 e) Annual Contributions for Section 8 Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing operation PDRA Tenant Rental Income 14,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Public housing operation Other Market Rate Rental and Commercial Leasing S. Non-federal sources (list below)			
d) HOPE VI Demolition e) Annual Contributions for Section 8 Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program 2,770,000.00 Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Community Based Crime Reduction Emergency Shelter Grants Program Community Health Worker Program Community Health Worker Program 2, Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing operation PBRA Tenant Rental Income 4, Other income (list below) PBRA Tenant Rental Income 125,500,000.00 Public housing operation Development Fees 769,000.00 Public housing operation Development Fees 769,000.00 Public housing operation		,	
e) Annual Contributions for Section 8 Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Cornonavirus State & Local Fiscal Recovery Program Community Health Worker Program Community Health Worker Program Community Health Worker Program 200,000.00 Low Income Energy Assistance Program 22. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing operation PBRA Tenant Rental Income 4. Other income (list below) PBRA Tenant Rental Income 4,400,304.00 Public housing operation Development Fees Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)		73,650,000.00	
Tenant-Based Assistance f) Resident Opportunity and Self-Sufficiency Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Low Income Energy Assistance Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income Development Fees Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Pion Community Housing Operatior Public housing operatior		, ,	
Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2. Public housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 13,500,000.00 Public housing operation Development Fees Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Public housing operatior	,		
Grants g) Community Development Block Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing operation PBRA Tenant Rental Income 4. Other income (list below) PBRA Tenant Rental Income Development Fees Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below) Non-federal sources (list below) Public housing operation	f) Resident Opportunity and Self-Sufficiency	650,000.00	
Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 125,500,000.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing Leasing Show,000.00 Public housing operation 13,500,000.00 Public housing operation	,	,	
Grant/Entitlement Grants (CDBG cluster) h) HOME Investment Partnerships Program Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing Leasing S. Non-federal sources (list below)	g) Community Development Block	8,459,000.00	
Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 1			
Other Federal Grants (list below) Project-Based Rental Assistance Continuum of Care Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 1	h) HOME Investment Partnerships Program	2,770,000.00	
Continuum of Care Housing Opportunities for Persons with AIDS 2,300,000.00 Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 13,500,000.00 Public housing operation		<u> </u>	
Housing Opportunities for Persons with AIDS Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 1,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)	Project-Based Rental Assistance	36,000,000.00	
Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 155,500,000.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)	Continuum of Care	2,300,000.00	
Weatherization Assistance for Low-Income Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 155,500,000.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)	Housing Opportunities for Persons with AIDS	2,300,000.00	
Persons Community-Based Crime Reduction Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)			
Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 13,500,000.00 Public housing operation Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation Public housing operation Public housing operation 13,500,000.00 Public housing operation Public housing operation 13,500,000.00 Public housing operation	Persons	,	
Emergency Shelter Grants Program Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 13,500,000.00 Public housing operation Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation Public housing operation Public housing operation 13,500,000.00 Public housing operation Public housing operation 13,500,000.00 Public housing operation	Community-Based Crime Reduction	300,000.00	
Coronavirus State & Local Fiscal Recovery Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 4,400,304.00 Public housing operation Public housing operation 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Tother Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)	·		
Program Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 30,000.00 Public housing capital improvements 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)		<u> </u>	
Community Health Worker Program Low Income Energy Assistance Program 200,000.00 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Public housing operation 4,400,304.00 Public housing operation Public housing operation 769,000.00 Public housing operation 13,500,000.00 Public housing operation Public housing operation 13,500,000.00	•	, ,	
Low Income Energy Assistance Program 2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 3. Public Housing Dwelling Rental Income 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 4,400,304.00 Public housing operation Public housing operation 4,400,304.00 Public housing operation Public housing operation Public housing operation 13,500,000.00 Public housing operation Public housing operation Public housing operation 13,500,000.00 Public housing operation		300,000.00	
2. Prior Year Federal Grants (unobligated funds only) (list below) 2023 Capital Fund 153,217.00 Public housing capital improvements 3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)			
funds only) (list below)2023 Capital Fund153,217.00Public housing capital improvements3. Public Housing Dwelling Rental Income290,000.00Public housing operation4. Other income (list below)25,500,000.00Public housing operationPBRA Tenant Rental Income4,400,304.00Public housing operationInterest Income4,400,304.00Public housing operationDevelopment Fees769,000.00Public housing operationOther Market Rate Rental and Commercial13,500,000.00Public housing operationLeasing13,500,000.00Public housing operation		·	
2023 Capital Fund 153,217.00 Public housing capital improvements 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation 25,500,000.00 Public housing operation 4,400,304.00 Public housing operation 25,500,000.00			
3. Public Housing Dwelling Rental Income 290,000.00 Public housing operation 4. Other income (list below) PBRA Tenant Rental Income 125,500,000.00 Public housing operation 25,500,000.00		153,217.00	Public housing capital
4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial 13,500,000.00 Public housing operation Leasing 5. Non-federal sources (list below)			
4. Other income (list below) PBRA Tenant Rental Income 25,500,000.00 Public housing operation Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial 13,500,000.00 Public housing operation Leasing 5. Non-federal sources (list below)			
PBRA Tenant Rental Income Interest Income Development Fees Other Market Rate Rental and Commercial Leasing Non-federal sources (list below) Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation 13,500,000.00	3. Public Housing Dwelling Rental Income	290,000.00	Public housing operations
PBRA Tenant Rental Income Interest Income Development Fees Other Market Rate Rental and Commercial Leasing Non-federal sources (list below) Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation 13,500,000.00 Public housing operation 13,500,000.00			
Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial 13,500,000.00 Public housing operation Leasing 5. Non-federal sources (list below)	4. Other income (list below)		
Interest Income 4,400,304.00 Public housing operation Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial 13,500,000.00 Public housing operation Leasing 5. Non-federal sources (list below)	PBRA Tenant Rental Income	25,500,000.00	Public housing operations
Development Fees 769,000.00 Public housing operation Other Market Rate Rental and Commercial 13,500,000.00 Public housing operation Leasing 5. Non-federal sources (list below)			Public housing operations
Other Market Rate Rental and Commercial Leasing 5. Non-federal sources (list below)	Development Fees	<u> </u>	Public housing operations
Leasing 5. Non-federal sources (list below)		<u> </u>	Public housing operations
5. Non-federal sources (list below)		, ,	
TE 4 1			
1 otal resources \$173,925,684.00	Total resources	\$173,925,684.00	

B.1 | Rent Determination

Public Housing: N/A

Section 8:

Minimum Rent:

The PHA's minimum rent is \$50.00.

The PHA has adopted the following discretionary minimum rent hardship exemption policies.

- 1. The minimum rent requirement may be waived under certain circumstances. Financial hardship status is to be granted immediately for ninety (90) days in the event of the following:
 - a. The family has lost eligibility or is awaiting an eligibility determination to receive federal, state or local assistance, including a family having a non-citizen household member lawfully admitted for permanent residence and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996;
 - b. The family income has decreased due to changed circumstances such as separation, divorce, and abandonment;
 - c. One or more family members have lost employment;
 - d. The family would be evicted as a result of imposing the minimum rent requirement;
 - e. There has been a death in the family; or
 - f. There are other hardship situations determined by the PHA on a case-by-case basis, i.e., alimony, child support, etc.

Financial hardship exemption only applies to payment of minimum rent - not to rent based on the statutory formula for determining the Total Tenant Payment (TTP).

- 2. If tenant initiates a request for a hardship exemption that the PHA determines is temporary in nature:
 - a. If the hardship is determined to be temporary, minimum rent may be suspended; during the ninety (90) day period beginning on the day the request is made. At the end of the ninety (90) day period, the minimum rent is reinstated retroactively to the date of suspension and the HAP is again adjusted.
 - b. In the case of a temporary hardship, the PHA will allow the family a maximum of six (6) months to make payment of any delinquent minimum rent payments accrued during the suspension period. However, the family must execute a Repayment Agreement.
 - c. If the hardship is subsequently determined to be long-term, the PHA will retroactively exempt residents from the minimum rent requirement for the ninety (90)-day period.

- B.1 d. Note that the PHA can only suspend the minimum rent contribution. If the family is residing in a unit whose Gross Rent exceeds the Payment Standard, the family will be responsible for the excess rent.
 - 3. Hardship determinations are subject to the PHA's Informal Hearing Process and families are exempt from any escrow deposit that may be required under regulations governing the hearing process for other determinations.

Operation and Management

PHA Management Structure:

(See attachment tn005d01)

HUD Programs Under PHA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	N/A	N/A
Section 8 Vouchers	5835	8.5%
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	FISK – 12	N/A
	<i>MERC</i> – 25	
Special Purpose Section 8		
Certificates/Vouchers (list		
individually)		
EHV	190	N/A
FUP	39	N/A
MAIN	195	N/A
VASH	452	N/A
Other Federal Programs	N/A	N/A
(list individually)		

Homeownership

Section 8 Tenant Based Assistance:

The PHA does administer a homeownership program for Section 8. *The PHA is not enrolling new families*.

The PHA has not established criteria for participation in addition to HUD criteria.

Substantial Deviation/Significant Amendment/Modification

In general, MDHA has adopted the "safe harbor" working definition for significant amendments and substantial deviations/modifications to the Plan as they were contained in Notice PIH 99-51, the definition would include the following:

B.1	1. Changes to rent or admissions policies or organization of the waiting list;
	2. Additions of non-emergency work items (items not included in the current Annual
	Statement or Five-Year Action Plan) or change in the use of replacement reserve funds
	under the Capital Fund;
	3. Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.
	programs of conversion activities.
	MDHA would not consider changes in program funding levels (differences between estimated grant amount and actual allocations), decisions whether or not to apply for additional discretionary grants, or initiation of changes in administrative policies which would not go into effect until a subsequent Plan year to be substantial deviations of modifications. In addition, considering the prospect of significant reductions in Federal funding for housing programs, any changes in operating policies and procedures needed to accommodate the reduced funding will not be considered a significant amendment or substantial deviation modification. MDHA would also exclude from substantial deviation/modification those changes in rents, policies or procedures mandated by Congressional action.
	procedures mandated by Congressional action.
	(c) The PHA must submit its Deconcentration Policy of Field Office review. (See attachment tn005b01)
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

B.2 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

Conversion of Public Housing to Project-Based Assistance under RAD (See attachment tn005c01)

Upon completion of construction and stabilization of some of the new mixed-income housing as described in the previous paragraph, the affordable units of which will be developed as public housing under remaining eligibility of the Faircloth Amendment, MDHA will apply to have these units converted thru RAD to Project-Based Rental Assistance. Specific projects currently eligible for RAD conversion include the Randee Rogers Apartments which has 50 units eligible for PBRA conversion and the Red Oak Townhomes which has 25 such units. There may be additional projects initiated during future years.

Project-Based Vouchers

The MDHA Board of Commissioners has previously authorized up to 1,400 of its allocation of Housing Choice Vouchers to be converted to Project Based. To date, just over *1000* PBVs have been awarded. At this time, there is no plan to increase the Project-Based utilization beyond the current *1000 plus* units. However, the Board wishes to leave this option available should circumstances change and an additional utilization seem prudent.

Community Choice Demonstration Program

In April 2021, MDHA was one of nine PHAs in the country selected for the CCD program. MDHA launched the program and began enrolling families in August 2022. As of March 30, 2024, 297 families have been enrolled. Breakdown of enrollment numbers below:

Total Enrolled: 297

Total Assigned to CMRS: 148

Total Assigned to Control: 149

Total Existing Voucher Holders Enrolled: 290

Total Existing Voucher Holders Assigned to CMRS: 144 Total Existing Voucher Holders Assigned to Control: 146

Total Waitlist Families Enrolled: 7

B.3 Progress Report.

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

GOAL #1: INCREASE THE SUPPLY OF MDHA-OWNED HOUSING

MDHA established the following objectives to strive in meeting goal #1

- Utilize remaining capacity (approximately 997 units) under the Faircloth Amendment to increase the number of public housing units (which will later be converted to Project-Based Rental Assistance).
- Utilize various forms of financial assistance (grants, loans, contributions, MDHA equity, etc.) to construct workforce and market-rate housing in conjunction with subsidized housing being development so as to deconcentrate poverty.

Progress Statement:

In 2023, MDHA began vertical construction on Cherry Oak Apartments. This 96-unit development includes 45 PBRA assisted units replace outdated Cayce Place units, 8 new affordable units, 6 workforce units, and 37 market rate units. It is expected to be completed in Spring 2024.

MDHA broke ground on 5th & Summer. This 107-unit development includes 10 PBRA assisted units replace outdated Cayce Place units, 56 new affordable units, and 41 market rate units. It is expected to be completed in Fall 2025.

MDHA continues to evaluate opportunities to utilize Faircloth Amendment authority to add to its subsidized housing inventory through new development and/or acquisition of appropriate units.

GOAL #2: INCREASE AND IMPROVE THE SUPPLY OF AND ACCESS TO HOUSING CHOICE VOUCHERS

MDHA established the following objectives to strive in meeting goal #2:

- Apply for replacement vouchers that become available as owners opt-out of Section 8 Project-Based assistance or any other voucher assistance that is made available and is suitable for MDHA.
- Maximize utilization by maintaining a utilization rate of at least 99% annually.
- Conduct at least three landlord meetings per year.
- Attract at least 40 new property owners to the Housing Choice Voucher program each year.
- Increase the percentage of vouchers leased in non-impacted census tracts from 69% to 72%.
- Have at least three Housing Choice Voucher clients graduate to homeownership each year.
- Explore ways to fund and expand landlord incentive program for VASH participants to apply to other program participants.

B.3

- Maintain a SEMAP score of 97 or higher.
- In Rental Assistance, conduct staff meetings addressing quality control issues at least quarterly.
- Conduct a Housing Choice Voucher program participant survey biennially.
- Increase the project-based voucher PBV program cap from the currently Board approved 900.

Progress Statement:

MDHA utilized 99% of HUD funding provided for the FY ending 9/30/2023. To date, two landlord briefings have been conducted with both in person and virtual attendance options. There are two meetings/briefings planned for remaining quarters of the year. 103 new landlords were added in 2023. There have been seven participants who graduated to homeownership in 2023; along with 17 participants who have graduated from homeownership classes. It can be anticipated that we will meet the goal of three for 2024 for homeownership.

MDHA has collaborated with Low Barrier Housing Collective of Nashville, TN which provided services such as incentives for landlords in the areas of VASH and special programs in 2023. Presently, 91 landlords have taken advantage of this service. Our SEMAP score for the 2023 fiscal year is 100. Rental Assistance conducts monthly staff meetings addressing quality control issues with an emphasis on training and education to help improve any quality control findings. In 2023; a Housing Choice Voucher participant survey was conducted in which 676 responses were received from participants. Our PBV voucher cap was broadened from 900 to 1400.

PHA GOAL #3: SUSTAIN VIABLE COMMUNITIES AND THE URBAN CORE

MDHA established the following objectives to strive in meeting goal #3

- Increase and maintain the number of Family Self-Sufficiency Voucher households to 150 participants.
- Establish 3 new partnerships annually with agencies that promote aspects of family self-sufficiency (homeownership, budget management, career development, job training and readiness, etc.)
- Working with new and existing partners, provide at least 4 sessions annually that focus on job training, job readiness, and employability.

Progress Statement:

The HCV program has a total of 147 participants enrolled in the FSS program. The RAD converted sites have a total of 78 participants in the FSS program. Several new Social Services partnerships formed for the purpose of promoting aspects of family self-sufficiency. A few of the most valuable partnerships established during this reporting year were with the following organizations:

Regions Bank Group- Financial Counseling, Down payment assistance, Home equity and Mortgage programs/Internships

B.3 Wilson Bank and Trust- Home mortgage loans, Financial Planning and 1st Time Homebuyers Loans

Nashville State Community College- Career Advancement, Business and Industry Training and Cooperative Education (Co-op)

Goodwill Industries- Comprehensive job training, Educational Initiatives and Career Opportunities

Additional new partnerships include Corner to Corner and You Can Make It along with the following banks: 5th 3rd, Regions and Ascend to promote the aspects of family self-sufficiency.

MDHA held many events and activities that were designed to increase and enhance employability skills of residents were held over this reporting period. Events and activities included but were not limited to: On-site Job Fairs, Resource Fairs, employability training by the mobile Career Coach Bus and workshops designed to increase marketability and as well as job readiness. MDHA also participated in programs through NACA, the Martha O'Bryan Center, and the Metro Action Commission.

PHA GOAL #4: PURSUE THE BEST HOUSING AND BUSINESS PRACTICES

MDHA established the following objectives to strive in meeting goal #4

- Improve the quality and capability of Agency staff in all areas. In the first year, identify specific training needs for staff and develop a training schedule for the remaining 4 years for the department.
- Integrate programs and staff from other Agency departments in housing initiatives, including *Transformation Plans formerly "Envision"*.
- Seek ways to further automate processes, digitalize forms and files.

PHA changed the 1st bullet above and deleted the 2nd bullet.

- Integrate programs and staff from other Agency departments in housing initiatives, including RAD and Envision Cayce.
- Apply for Moving to Work designation should the opportunity arise.

Progress Statement:

Our training needs have been identified based on quality control reviews, administrative errors and staff suggestions. The training schedule has been developed with flexibility to address any areas that may arise. Within 6 months of hire, our new specialist attends a Nan McKay HCV class to include a test to obtain that certification. Along with Nan McKay we utilize Nelrod, Association for Talent Development, HUD-Exchange Webinars, Knowledge Wave and Yardi's sources such as the Client Central database, Homeless Training-De-escalation. In addition, the CCD program staff has been trained by MEF & Associates and 1st PIC.

Our inhouse training covers areas such as Violence Against Women's Act, CCD Program, reasonable accommodation, administrative professional assistant training, along with

В.3	policies and procedures pertaining to operations. Our focus for 2024 has been on the new regulations that HUD has required to be implemented which includes NSpire and HOTMA.
	Our most utilized HUD forms are available on the website, and we encourage usage. Rent Cafe is being utilized for online automation for enrollment of the waitlist, application, recertification, interim and the landlord portal. Assistance is provided for landlords and participants utilizing the tools and resources upon request.
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) in EPIC and the date that it was approved.
	See Capital Fund 5 Year Action Plan in EPIC approved by HUD on/ /
B.5	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N
	(b) If yes, please describe: N/A
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) provide comments to the PHA Plan? (See attachment tn005a01)
	Y N
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>N/A</i>
C.2	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.			
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations - Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.			
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.			
	(a) Did the public challenge any elements of the Plan?			
	Y N			
	If yes, include Challenged Elements. <i>N/A</i>			
C.5	Troubled PHA.			
	a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?			
	Y N			
	(b) If yes, please describe: <i>N/A</i>			
D.	Affirmatively Furthering Fair Housing.			
D.1	Affirmatively Furthering Fair Housing (AFFH).			
	Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. <i>N/A</i>			

Attachment: tn005a01 Metropolitan Development and Housing Agency Resident Advisory Board Consultation Process and Comments – FYB 2024

1. Resident notification of appointment to the Advisory Board

At beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board Please provide date

2. Resident Advisory Board Selection

Selection made from resident/participant response Please provide date

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan Please provide date

Notify Resident Advisory Board of scheduled meeting Please provide date

Hold Resident Advisory Board meeting Please provide date

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad Please provide date

Notify Resident Advisory Board Please provide date

Hold Public Hearing meeting Please provide date

5. Documentation of resident recommendations and PHA's response to recommendations

Please provide the residents' recommendations/comments and the PHA response to each comment after each RAB meeting.

Attachment: tn005b01 Metropolitan Development and Housing Agency Deconcentration Policy

The agency's policy is to promote the development of low-income housing developments in mixed-income communities located in areas where residents of all income ranges will have access to community amenities. In compliance with HUD's requirement to affirmatively further fair housing, MDHA will continue developing mixed-income properties consisting of market (120% AMI and above), workforce (80%-120%), and low-income (below 80%) units. These properties will include the same amenities and bedroom size options for all residents regardless of income range (probably more of the larger bedroom-size units for low-income households to meet the needs of current residential households). MDHA limits developments that are entirely low-income to properties being built for special populations with wrap-around social services, and even when the agency develops such properties, it ensures they are located in areas of opportunity or areas experiencing significant revitalization through public and/or private investment.

The agency continues to implement its policy to promote the de-concentration of poverty through the recapitalization and transformation of its largest legacy public housing site through its Envision Cayce Plan. In program year 2021, as part of this plan, MDHA completed construction on Red Oak Flats (102-unit apartment building, 44% which are set aside for low-income residents currently residing at Cayce Place, with the remaining consisting of a mix of workforce and market-rate residents) and Red Oak Townhomes. HUD's Office of Fair Housing & Equal Opportunity has already approved the Site and Neighborhood Review for both developments. In 2022, MDHA initiated construction on another mixed-income development (Cherry Oak Apartments) and received a tax-credit allocation for still another project (5th and Summer), both in the Cayce Place footprint. Additionally, MDHA completed work on another developments (outside of the Cayce location) that promotes the de-concentration of poverty. It completed construction on Randee Rogers Apartments, a 100-unit mixed-income development (50% for low-income families) located in a Census Tract which has experienced rapidly rising income levels over the last decade and contains multiple community services, including a large grocery store adjacent to the development. Finally, it will collaborate with the Metropolitan Nashville government on Metro's development of a "permanent supportive housing development" for individuals experiencing homelessness, advising on construction administration and facilitating a study to operationalize the property.

Attachment: tn005c01 Metropolitan Development and Housing Agency Conversion of Public Housing to Project-Based Assistance under RAD

METROPOLITAN DEVELOPMENT AND HOUSING AGENCY MEMORANDUM

January 31, 2024

TO: Stephanie King, Portfolio Management Specialist

U.S. Department of Housing and Urban Development

CC: Dr. Troy D. White, Executive Director

FROM: Candace Jamison, Chief Operating Officer

SUBJECT: MDHA RAD Specific/Annual PHA Plan Revisions

Ms. Stephanie King of the Nashville Office of Public Housing of the U.S. Department of Housing and Urban Development has requested additional information from the Metropolitan Development and Housing Agency (MDHA) related to the agency's 2023 Annual Public Housing Agency Plan. Specifically, Ms. King requests additional information about MDHA's RAD activities as required by PIH Notice 2019-09. Please find the requested information below.

1. MDHA's significant amendment and substantial deviation definitions.

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

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

2. Bedroom Distribution of Units

	1BR	2BR	3BR	4BR	5BR
Randee	26	17	7		
Rogers					
Apartments					

Red Oak	1	16	7	1
Townhomes				

3. Types of Units

Randee Rogers Apartments: Family

Red Oak Townhomes: Family

The units will be converted to Project Based Rental Assistance. There will be no change in the number of units, bedroom distribution or population served after conversion.

4. Waiting List Preferences

Upon conversion to Project Based Rental Assistance MDHA will adopt the resident rights, participation, waiting list and informal grievance procedures listed in Section 1.7 of H 2019-xx/PIH 2019-xx, REV-4; and H-2016- 17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are attached. MDHA certifies that it is currently compliant with all fair housing and civil rights requirements.

Project Based Rental Assistance Requirements (Section 1.7 of Notice H 2019-xx, PIH 2019-xx; and Notice H 2016-17, PIH 2016-17)			
Tenant Protections Under Notice H 2016-17; PIH 2016-17			
Right to Return and Relocation Assistance	Metropolitan Development and Housing Agency Relocation Plan		
	Under Section 1.7.B		
No rescreening of tenants upon conversion	Metropolitan Development and Housing Agency Relocation Plan		
Phase-in of tenant rent increase	RAD PBRA Quick Reference Guide		
FSS and ROSS-SC programs	RAD PBRA Quick Reference Guide		
Resident Participation and Funding	Resident Participation Funding memorandum of agreement between the Metropolitan Development and Housing Agency and the Resident Association RAD PBRA Quick Reference Guide		
Termination notification	Metropolitan Development and Housing Agency Relocation Plan		
Grievance process	Metropolitan Development and Housing Agency Relocation Plan		
Earned Income Disregard	RAD PBRA Quick Reference Guide		
Jobs Plus	RAD PBRA Quick Reference Guide		
When Total Tenant Payment Exceeds Gross Rent	RAD PBRA Quick Reference Guide		

Tenant Protections Under Section 1.7.C		
Establishment of Waiting List	RAD PBRA Quick Reference Guide	

5. Statement certifying that RAD Conversion complies with all applicable site selection and neighborhood reviews.

MDHA certifies that the site complies with applicable site and neighborhood standards.

6. Changes to the Capital Fund Budget as a result of approved RAD Conversion.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing access to private sources of capital to repair and preserve affordable housing assets. Please be aware that upon conversion, the MDHA Capital Fund Budget will be reduced by the pro rata share of Public Housing developments converted as part of the demonstration. MDHA may also borrow funds to address capital needs.

Randee Rogers Apartments: MDHA will contribute operating reserves in the amount of \$100,000.

Red Oak Townhomes: MDHA will contribute operating reserves in the amount of \$800,000.

Attachment: tn005d01 Metropolitan Development and Housing Agency Organizational Chart



Metropolitan Development and Housing Agency

