

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: Greater Gadsden Housing Authority _____ PHA Code: AL049____ PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing (as of last report issued for 6/30/09) <input type="checkbox"/> Standard <input checked="" type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning g: (MM/YYYY): 07/2011_____					
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 1,004____ Number of HCV units: 112____					
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only					
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)					
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
					PH	HCV
	PHA 1: Greater Gadsden Housing Auth (GGHA)	AL049	NONE	The GGHA has seven AMPs as follows: AL049001-Colley Homes AL049002-Carver Village AL049003-Emma Sansom AL049004-Gateway Village AL049005-Campbell Ct AL049006-Starnes Park AL049007-Starnes Park - Phase II AL049008-Northside Total HA units AL049	224 160 220 106 150 100 2 42 1,004	112
	PHA 2:					
	PHA 3:					
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.					

5.1	<p>Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: The basic mission of this HA is to serve the needs of low-income persons in the PHA jurisdiction as follows:</p> <ul style="list-style-type: none"> Promote adequate and affordable housing • Promote economic opportunity • Promote a suitable living environment free from discrimination. <p>The HA mission is to provide drug free, decent, safe and sanitary housing for eligible individuals and families and to provide opportunities and promote self-sufficiency and economic independence for residents. In order to achieve this mission, we will:</p> <ul style="list-style-type: none"> • Recognize residents as our ultimate customer; • Improve Public Housing Authority (HA) management and service delivery efforts through effective and efficient management of HA staff; • Seek problem-solving partnerships with residents, community, and government leadership; • Apply HA resources, to the effective and efficient management and operation of public housing programs, taking into account changes in Federal funding. • Comply and Support the Violence Against Women and Justice Department Reauthorization Act 2005 • The HA 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. <p>The HA does not plan to have any Significant Amendment and Substantial Deviation/Modification Annual or Five-Year plan as defined in section 10 below.</p>
5.2	<p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.</p> <p>Goal I. Public Housing: Maintain existing stock of public housing in decent, safe and sanitary condition and maintain an average score of no less than 80 on the PHAS score for the Fiscal Years ending June 30, 2009 through June 30, 2014.</p> <p>Update for Public Housing: The HA has accomplished these goals for the PHAS reports issued to date (as summarized below). The stock of public housing units is decent, safe and sanitary and HA history of PHAS scores is as follows: The PHAS score was 83.9 the FYE 6/30/2000, and 87 for the FYE 6/30/2001, and 94 for the FYE 6/30/2002, and 96 for the FYE 6/30/2003, and 91 for the FYE 6/30/04, and 85 for the FYE 6/30/05, 86 for the FYE 6/30/06, and 91 for 6/30/07. No score was issued for the period 6/30/08. Therefore, the average score from 6/30/2000 thru 6/30/2008 was 89.23 (83.9+87+94+96+91+85+86+91/8) and the HA exceeded its goal for this time period.</p> <p>Update Starting June 30, 2009: The PHAS score was 91 for the period ending June 30, 2009 and as of this date no score has been issued for the period ending 6/30/10. As of this date, the HA is exceeding the average score of 80 or above for the period June 30, 2009 through June 30, 2014. Also, the HA does not anticipate any problem in maintaining an average score of 80 or more for this time period and goal.</p> <p>Goal II. Section 8: Utilize Section 8 funding and maintain an average score of no less than 80 on the SEMAP for the Fiscal Year ending June 30, 2009 through June 30, 2014.</p> <p>Update for Section 8: The HA's first SEMAP score was 80 for the FYE ending 6/30/2001, and 96 for the FYE 6/30/2002, and 83 for the FYE 6/30/2003, and 100 for the FYE 6/30/2004, and 85 for the FYE 6/30/05, and 100 for the FYE 6/30/2006, and 96 for the FYE 6/30/07 and 67 for the FYI 6/30/08. The average score from 6/30/2001 thru 6/30/2008 was 88.38 (80+96+83+100+85+100+96+67/8) and the HA exceeded its goal for this time period. Update Starting June 30, 2009: The score was 93 for the FYE 6/30/09 and 96 for the FYE 6/30/10. The average score from</p>

6/30/2009 thru 6/30/2010 is 94.5 (93+96/2). The HA does not anticipate any problems in maintaining an average score of 80 or above for the period June 30, 2009 through June 30, 2014.

Goal III: Improve the quality of assisted housing for Public Housing (Goal III-A) and Section 8 Housing Choice Program voucher management (Goal III-B).

Objectives:

Goal III-A: Improve public housing management: (PHAS score)

Maintain an average PHAS Score of 84.9 by 6/30/2014, which will be a 1 point increase over the HA score of 6/30/2000, which was 83.9. **Update:** The HA score for 6/30/2000 was 83.9 and 87 for the FYE 6/30/2001 and 94 for the FYE 6/30/2002 and 96 for the FYE 6/30/2003 and 91 for the FYE 6/30/2004, and 85 for 6/30/05, and 86 for 6/30/06 and 91 6/30/07 and no score was issued for 6/30/08. The PHAS score for 6/30/09 was 91. Our current average is 89.43 ($83.9+87+94+96+91+85+86+91+91/9 = 89.43$); therefore, we are exceeding this goal. The HA anticipates that there will be no problems in maintaining an average PHAS score of 84.9 by 6/30/2014.

Goal III-B: Improve voucher management: (SEMAP score)

Maintain an average SEMAP Score of 81 by 6/30/2014, which will be a 1 point increase over the score of June 30, 2001, which was 80. **Update:** The HA's first SEMAP score was 80 for the period ending 6/30/2001; and 96 FYE 6/30/2002; and 83 FYE 6/30/03; and 100 for the FYE 6/30/04; and 85 for the FYE 6/30/05; and 100 for the FYE 6/30/06, and 96 for the FYE 6/30/07 and 67 for the FYE 6/30/08 and 93 for the FYE 6/30/09 and 96 for the FYI 6/30/10. The current average is 88.89 ($80+96+83+100+85+100+96+67+93+96/10 = 89.6$); therefore, we are exceeding this goal. The HA does not anticipate any problems in maintaining an average SEMAP score of 81 by 6/30/2014.

Goal IV: Demolish or dispose of obsolete public housing as appropriate: The HA wants to ensure that all public housing property is managed properly and is in decent, safe and sanitary condition and the HA can maintain an occupancy rate of 97% or more. With the submission of the Annual and Five Year Plan for the period beginning July 1, 2009, the HA indicated that it was analyzing the financial feasibility of maintaining Northside Homes, which is a 42 unit development that was built in 1983. The GGHA had been planning to demolish units at Northside Homes since the initial planning meeting of December 9, 2008, with the City-Wide Resident Council. The GGHA wants to ensure that all public housing property is managed properly and is in decent, safe and sanitary condition. The GGHA has been analyzing the financial feasibility of maintaining Northside Homes in its present state, which is a 42 unit development that was built in 1983. As of December 31, 2008, Northside Homes had an operating loss of \$18,423.21. As of January 31, 2010, the operating loss for this period was \$1,517.08. As of December 31, 2010, there was an operating profit of \$7,816.20. Northside Homes would not be operating at a profit if the GGHA had not transferred \$25,000 of excess cash available from operations of Campbell Court and \$15,090 from the operations budget line item of Capital Fund 501-08 to help Northside Homes meet its financial obligations for the FYE June 30, 2009. Therefore, the GGHA has transferred a total of \$40,090 (\$25,000 + \$15,090) to Northside Homes to help this development operate at a profit. Based on these negative trends, maintaining Northside Homes in its present condition is not financially feasible. After analyzing this development for three years, the GGHA is planning to demolish five (5) buildings, which contain thirty (30) units. The five (5) buildings are two story buildings and occupied by families. The remaining three (3) buildings and twelve (12) units are single story buildings and currently occupied by the elderly and disabled. These three (3) buildings are consistently under lease and the GGHA does not have any problems in keeping these units leased. However, in the five (5) buildings and thirty (30) units that are occupied by families consistently have vacancy problems. Over the past three years the thirty (30) units proposed for demolition have averaged a vacancy percentage of 13%, which is unacceptable. These units are the primary reason this development has financial problems. However, there are several other **IMPORTANT** factors that contribute to the decision to demolish these units. As stated above the units were built in 1983 and have not been renovated. They were built on a severe incline that provides almost no front or back yard for the residents and their children. The units were also built next to a large hill and this property has an erosion problem and dirt continues to slide down the hill and onto the HA property creating draining problems and constantly creates work to remove the dirt that fills the drainage ditch. During the last year the GGHA has removed approximately 25 tons of dirt from the drainage ditch. This also creates a problem with the Physical Inspection score from HUD's Real Estate Assessment Center (REAC) score for Northside Homes. The last physical inspection for Northside Homes was completed on June 10, 2010, and the physical inspection score was 24.5 out of a possible score of 30. The dirt in the drainage ditch was a deduction of 13.6 of a possible 16.3 for the site score, which is the score assigned to the grounds for Northside Homes. Therefore, if there was no drainage problem the GGHA would have scored approximately 28.56 out of 30.

Also, when this development was built in 1983, all the utilities were owned by the utility company. This means that all residents are required to pay deposits to have their water, gas and electricity turned on prior to moving in the development. Since the GGHA has six other developments and a total of 962 units available for occupancy, the majority of family applicants choose to lease a unit in one of the other developments because they are only required to pay a gas deposit. The GGHA currently spends approximately \$50,000 to renovate a unit and committing approximately \$1,500,000 of Capital Funds to renovate thirty (30) units at Northside Homes does not make or represent a sound financial decision. Therefore, the GGHA is submitting a demolition application for approval for the demolition of five (5) buildings and thirty (30) units in Northside Homes. The HA has complied with all notice and regulatory requirements for submitting the demolition application. The current five-year plan for capital funds includes funds to demolish these buildings and units with funds allocated in Federal Fiscal Year 2011. The demolition application was submitted to HUD via the internet on February 7, 2011.

Goal V: Comply with Lead Base Paint requirements and report to HUD annually. On April 10, 2008, the HUD Birmingham Field Office issued Circular Letter Number PHD FY-2008-029, concerning lead based paint compliance and information collection. The HA conducted Lead Based Paint (LBP) testing and all areas identified have been abated or disposed of in accordance with applicable Federal, State and local requirements for Housing Authorities. The HA submits the required LBP Activity Report (HUD Form 52850 on an annual basis. Section XXIV of the public housing dwelling lease contains the required information relative to LBP activities of the HA and each public housing resident and all new admissions must complete this section of the lease, which reads as follows:

DISCLOSURE OF INFORMATION ON LEAD-BASED PAINT AND LEAD-BASED PAINT RISKS. Housing built before 1978 may contain paint containing lead. The landlord has disclosed the presence of known lead-based paint and lead-based paint risks in the dwelling and has provided a pamphlet issued by the government on lead poisoning prevention. The landlord has made available to me access to written files containing notice of risk assessments, paint inspections, and/or hazard reduction activities relating to lead paint relating to my apartment.

Head of Household's initials is Acknowledgment of:

- I do not want to review the Lead-Based Paint records referenced above; **OR**
 I do want to review the Lead-Based Paint Records referenced above.

I was given the opportunity to review all the records and reports documenting the testing and abatement of lead-based paint hazards.

I received a copy of the pamphlet, "Protect Your Family from Lead in Your Home."

The HA has all the applicable LBP records on file and they are available for review.

NOTE: The last LBP Activity HUD Form 52850 was transmitted to HUD on April 5, 2010, for the period ending March 30, 2010. This was a negative report because there was no LBP activity for the reporting period. **Update:** The next LBP Activity Report HUD Form 52850 will be transmitted to HUD in early April 2010 for the period ending March 31, 2011. This report will also be a negative report because there was no LBP activity for this reporting period.

Goal VI: Increase assisted housing choices for individuals and families issued a Section 8 Housing Choice Voucher: (see goals VI-A thru VI-C below)

Objectives: There are three objectives for this goal as explained below:

Goal VI-A: Provide voucher mobility counseling: As described in Section XIV, of the Section 8 Administrative Plan. **Update:** Each person that receives a voucher is counseled when the voucher is issued on how Section 8 vouchers are mobile and that they have a number of options on where they chose to lease a unit. Each person that is issued a voucher goes through the re-certification process and at that time they are counseled concerning the mobility/portability of a voucher. Also, the HA adopted a new Section 8 Administrative Plan on September 26, 2006, that included an **exception** to the portability procedures, which reads as follows: "**Exception:** If the HA does not have sufficient funds to cover the cost of a portable voucher to a higher cost area, the HA will deny the portable voucher unless the receiving HA agrees, in writing, to absorb the voucher." The HA documents all denials of portability by completing the form entitled, "Determination of Portability Request." Each applicant and participant is informed of the exception to portability rules during the application process for applicants and during the re-certification process for participants.

Goal VI-B: Conduct outreach efforts to potential Section 8 landlords: Increase the number of landlords that participate in the voucher program by five (5) from 7/1/2000 to 6/30/2005. The HA **accomplished this goal**

and added 91 new landlords during this time period. A new goal was established with the submission of the July 1, 2006 Annual and Five-Year Plan to add 15 new landlords by 12/31/2011. **Update:** Since 7/1/2006, and through December 31, 2010, the HA added has added 47 new Section 8 Landlords. Therefore, the HA has exceeded the goal established for June 30, 2011. The HA will continue its efforts to add new Section 8 Landlords and increase opportunities for Section 8 participants. A new goal is being established with the submission of this plan and that is to add 20 new Section 8 Landlords from January 1, 2011 to June 30, 2014. Establishing this time frame will place this goal within the same time table for all other goals that end on June 30, 2014.

Goal VI-C: Comply with Deconcentration Rule for Section 8: The objective of the deconcentration rule for HCV tenant-based assistance is to admit no less than 75% of its new admissions to the program to families that have income at or below 30% of the area median income as of the end of each Fiscal Year of the HA, which is June 30th of each year. **Update:** As of 6/30 /10, 84.62% of HA's new admissions had income at or below 30% of the area median income, therefore this goal was exceeded for the period ending June 30, 2011. As of December 31, 2010, 100% percent of all new admissions have income at or below 30% of area median income and the HA does not anticipate any problems in being at or above 75% by June 30, 2011.

Goal VII: Provide an improved living environment

Objectives: (see goals VII-A & VII-B below)

Goal VII-A: Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments: The goal of the HA's is to meet the objectives outlined in Section XIX of the Admissions and Continued Occupancy Policy (ACOP) for accomplishing deconcentration for all communities no later than June 30, 2014. Section XIX of the ACOP specifies that 40% of all new admissions have income at or below area median income. Also, Section XIX of the ACOP specifies that the HA will take actions to insure that no individual development has a concentration of higher income families in one or more of the developments. To accomplish this, the HA established an income range from 85 to 115 percent (inclusive) of the average family income, except that the upper limit (115 percent) shall never be less than the income at which a family would be defined as an extremely low-income family. **Update:** As of 6/30/10, 77.86% of HA's new admissions had income at or below 30% of area median income; therefore, this goal was exceeded for the period ending June 30, 2010. As of December 31, 2010, 67.88% of 40% all new admissions have income at or below 30% of area median income and the HA does not anticipate any problems ensuring at 40% of all new admissions have income at or below 30% of area median income by June 30, 2011 and maintaining this minimum level through June 30, 2014.

Goal VII-B: Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments: To insure access for lower income families into higher income public housing developments, the HA's will skip families on the waiting list as outlined in Section VII B-7, of the Tenant Selection and Assignment Plan, which is contained in the ACOP. **Update:** As indicated above in the HA's deconcentration of poverty guidelines are contained in the ACOP, the HA has implemented measures to promote income mixing in public housing and as of 12/31/10, Colley Homes is the only development outside this income range from 85% to 115% and marketing steps are being taken to increase the income at Colley Homes (see PHA Plan Element A. Public Housing (6) Deconcentration Policy for Covered Developments for additional information). The HA does not anticipate in problems in having Colley Homes within the income ranges by June 30, 2014.

Goal VIII: Implement a comprehensive security plan for public housing security and safety:

Staff of the HA works with the City of Gadsden Police Department to ensure adequate police coverage and security. The HA has developed a comprehensive security plan to help ensure the safety of all public housing residents, guests and staff. The security plan is summarized as follows: The HA had contracted with the City of Gadsden for the services of eight police officers from February 1, 1993 through September 30, 2003, utilizing Public Housing Drug Elimination Program (PHDEP) funds. Since HUD discontinued the PHDEP program, the HA had to reduce the number of officers from eight to six effective October 1, 2003 and reduced to five officers effective October 1, 2008. The security program is funded utilizing Capital Fund allocations. The HA has also implemented the stricter screening and eviction provisions to comply with the federal requirements of the "One-Strike and You're Out" rule. The implementation of stricter screening policies keep criminals out of public housing and the swift eviction of residents involved with criminal activity helps keep criminal activity at a minimum. **Update:** The HA plans to continue its contract with the City of Gadsden for additional police coverage because it is necessary for the safety and well-being of the residents, their guests and HA staff. Also, the HA complies with the dwelling lease and ACOP in

taking appropriate actions in screening applicants and evicting residents that violate the “One-Strike and You’re Out” policies of the HA. This program has helped change Gadsden’s public housing from “Housing of Last Resort” to “Housing of Choice” and all parties involved in the annual and five year planning process are committed to keeping the extra police present in Gadsden Public Housing using Capital Funds. The residents understand that the funds used for security could be used for renovations of their homes but safety comes first and they are willing to devote less financial resources to renovations of their units to make funds available for security (See Section 10 additional information below for description of HA’s comprehensive security plan).

Goal IX: Designating development or buildings for residents groups that are elderly and/or disabled and comply with policy statement of complying with all applicable laws and regulations applicable to making reasonable accommodations.

Designate developments or buildings for particular resident groups (elderly, persons with disabilities or individuals needing special accommodations) **NOTE:** This section contains the policy statement of how the HA plans to comply with all applicable regulations dealing with making reasonable accommodations. The HA has a total of 1004 units of public housing and, 51 units are designated for persons with disabilities and fully accessible. The designated units comply with the requirements of the Americans with Disabilities Act (ADA). All of the community buildings and public offices managed by the HA, comply with ADA accessibility requirements. Also, it is the policy and practice of the HA to make reasonable accommodations for any individual with a disability, as outlined in Section XV of the Dwelling Lease, ACOP, Application and Resident Notice Concerning Requesting a Reasonable Accommodation for a Disabled Household Member. The HA fully intends to comply with all applicable laws and regulations applicable to making reasonable accommodations. **Update:** The HA is meeting its requirements as outlined above in designating development or buildings for residents groups that are elderly and/or disabled. The number of ADA units increased during this reporting period from 48 to 51. Three (3) one bedroom units were renovated in Gateway Village to meet ADA requirements. In addition to the 51, units designated for persons with disabilities, the HA has 112 units at Campbell Court and 77 units at Starnes Park that have been approved by HUD for occupancy of the elderly and disabled. The occupancy type for 189 of these units were changed from family to mix-population (elderly and disabled) on August 18, 1995, which is the date HUD approved the change in occupancy type. Two elderly and disabled unit were added with a DOFA date of March 31, 2010, and built with Housing Replacement Funds increasing the total from 189 to 191. Also, during the period from January 1, 2010 and through December 31, 2010, the HA processed 25 work orders for reasonable accommodations for existing public housing residents that requested an accommodation.

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

Objectives: (See goals X-A, X-B & X-C below)

Goal X-A: Increase the number and percentage of employed persons in assisted families: During the first year of the annual and five year process there were 339 (306 public housing & 33 Section 8) individuals employed that are assisted families, which includes public housing and Section 8 program families. It is the goal of the HA to increase the number of employed individuals by 2 per year for the next five years; therefore, increasing the total employed by 10 as of June 30, 2005. **Update:** As of June 30, 2005, there are 413 (390 public housing & 23 Section 8) individuals employed that are assisted families; therefore, we **exceeded the goal for June 30, 2005.** A new goal was established for period beginning January 1, 2006 and through June 30, 2011 with the submission of the Annual and Five-Year Plan beginning 7/1/2006. As of December 30, 2005, there were 359 (329 public housing & 30 Section 8) individuals employed that are assisted families. It is the goal of the HA to increase the initial goal of 339 by 25 to 364 by June 30, 2011. **Current Status:** As of December 31, 2010, there were 539 (492 Public housing & 47 Section 8) individuals employed that are assisted families; therefore, the HA has met this goal as of 12/31/10 and does not anticipate any problems maintaining the level of employment necessary to meet and/or exceed this goal as of June 30, 2011. The status as of June 30, 2011, will be reported with the submission of the July 1, 2012 plan and a new goal established.

Goal X-B: The HA is providing on the job training for residents in the area of maintenance. Residents are hired as temporary laborers and trained in different areas of maintenance and when a vacancy occurs they are qualified to apply for the vacant position. Since January 1, 1992 and through June 30, 2000, the HA hired 25 individuals and of that total 9 were residents, which is 36% of the total hired. It is the goal of the HA to hire residents for 15% of the vacancies within the HA effective January 1, 1992. **Update:** The number of individuals hired as regular employees (received benefits) since January 1, 1992 and through December 31, 2010 is 58 and of that total 13 have been public housing residents, which represent a percentage of 22.4%. Therefore, we continue to exceed our goal of filling 15% of the vacancies with residents. Also, the Executive

Director of the HA serves as Chairperson of the Jobs Task Force at the Department of Human Resources (DHR) and this task force works with DHR staff and with residents receiving TANF payments to prepare them for future employment.

Goal X-C: Provide or attract supportive services to increase independence for the elderly or families with disabilities. Increase independent living for the elderly and disabled. The HA works with the Council on Aging and the Home Extension service to provide programs to increase independent living for the elderly and disabled and it is the goal of the HA to have a minimum of twelve activities/programs per year for the elderly and disabled. **Update:** The HA continues working with the Council on Aging and the Home Extension service to improve the quality of life for the elderly and disabled. We are averaging one activity per month for the elderly and disabled; therefore, we are meeting our goal.

Goal XI: Ensure equal opportunity and affirmatively further fair housing

Objectives: (see goals XI-A, XI-B & XI-C)

Goal XI-A: Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability:

The HA promotes fair housing for all applicants and residents. We will not tolerate any type of discrimination because of a person's race, color, religion, sex or national origin. The HA works with local leaders from the National Association for the Advancement of Colored People (NAACP) to promote economic opportunities and affirmative action for low and very-low income families. To demonstrate the HA's commitment to equal opportunity and affirmative action, the HA leases a unit to the NAACP for their main office in Gadsden/Etowah County. The unit has been removed from occupancy, with HUD approval, and the NAACP is not charged rent because the programs they provide directly benefit public housing residents. **Update:** The HA continues to undertake affirmative measures, as outlined above, to ensure access to assisted housing regardless to race, color, religion, national origin, sex, familial status, and disability. The NAACP continues to maintain a unit in public housing and provides a variety of services to the residents.

Goal XI-B: Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability:

The HA will follow its admissions policies to insure that all applicants are housed on a non discriminatory basis in the public housing developments administered by the HA. One hundred percent of the Public Housing units administered by the HA meets and/or exceeds the Uniform Physical Condition Inspections standards established by HUD. Also, all Section 8 units approved by the HA are inspected and must meet Housing Quality Standards and these units are livable and suitable for all individuals. **Update:** The HA continues to undertake affirmative measures, as outlined above, to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability. Also, as specified by 24 CFR 903.7 (b) (2) (v) (B) of the Federal Regulations, the HA is required to use independent testers to assure that the site-based waiting list is not being implemented in a discriminatory manner and that no patterns or practices of discrimination exist. The HA hired the audit firm of Kendall L. Davis, PC to audit the HA's site-based waiting list for compliance with 24 CFR 903.7 (b) (2) (v) (B). Kendall L. Davis, PC issued an Independent Auditor's Report and it was their opinion that the site-based waiting list is not being implemented in a discriminatory manner and no patterns or practices of discrimination exist. The Independent Audit Report was transmitted to the HUD Birmingham Office of Public Housing on January 15, 2010, for their review. On January 28, 2010, staff of the Birmingham HUD Office of Public Housing issued a letter to the HA indicating that the HA had complied with the regulatory requirements for testing the site-based waiting list (The independent audit report and HUD's response to the HA are on file for review with the list of supporting documents for review with the Annual & 5-Year Plan). As required by 24 CFR 903.7 (b) (2) (v) (B), the HA will contract with an independent auditor for the period ending June 30, 2012, to audit the site-based waiting list for non-discriminatory patterns or practices. This type of audit is required to be performed every three years for HA's that maintain a site-based waiting list.

Goal XI-C: Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:

It is the policy and practice of the HA to accommodate all individuals with disabilities and within reasonable cost limitations make units accessible as needed. **Update:** The HA continues to undertake affirmative measures, as outlined above, to ensure accessible housing to persons with all varieties of disabilities

regardless of unit size required.

Goal XII: Comply with the provisions of the Violence Against Women and Justice Department Reauthorization Act 2005 (VAWA).

With the publication of HUD Notice 2006-23 and HUD Notice 2006-42 the HA established a goal that no individual covered under the VAWA that completes the certification to the alleged abuse and complies with the conditions of the certification will be evicted from public housing or have their Section 8 assistance terminated. This goal was added to the HA 5 Year Plan for the Fiscal Year beginning July 1, 2007 and any activity related to the eviction of victims covered under VAWA will be reported as updates to each 5 Year Plan submitted by the HA. The Board of Commissioners of the HA certified that the HA intends to comply with the implementing requirements of VAWA at the August 22, 2006, Board meeting. Also, on November 28, 2008, HUD published an interim rule on VAWA in the Federal Register and the Final Rule was published in the Federal Register on October 27, 2010. The final rule amends 24 CFR 903.6 (a) (3) {5-Year Plan Requirements} and 903.7 (m) (5) i, iii, iii {Annual Plan Requirements} requiring HA's to include a statement about goals, activities, objectives, policies, or programs that will enable the HA to serve the needs of a child and/or an adult "victim of domestic violence, dating violence, sexual assault and stalking". The HA works with local non-profit organizations that assist and provide shelter for domestic violence victims. The Executive Director is also the Chair of the Department of Human Resources (DHR) and he works closely with DHR representatives to ensure that any child and/or adult that is a victim of domestic violence, dating violence, sexual assault and stalking is reported to DHR immediately and corrective action taken immediately to protect the child and/or adult and the victim is provided needed services. The GGHA also reports any violations of the VAWA to the City of Gadsden Police Department for action as appropriate. Based on information maintained by the HA for housing individuals that are victims of domestic violence, we anticipate housing approximately 20 individuals/families for the period ending June 30, 2012 that may be victim of acts covered by the VAWA. The HA does not anticipate any problems in meeting the housing needs of any individual that that is a victim of domestic violence, dating violence, sexual assault and stalking and will be housed if all other eligibility requirements are met based on the current vacancies and the monthly turnover of all units administered by the HA. Processing applications takes approximately two weeks to complete and the shelters in the area work with the HA to provide temporary housing while the application is being processed. Also, the HA intends to comply with all provisions of the VAWA (See Section 6 PHA Plan Elements No. 13 below for complete description of VAWA activities by HA).

Status of Goal: Since the HA implemented the provisions of the VAWA Act no public housing resident and/or Section 8 participant has been evicted or Section 8 assistance terminated that qualified as a victim of abuses covered under the VAWA Act. For the year ending December 31, 2010, the HA did had one report of physical abuse. A female reported physical abuse by her husband who was on the lease. The female got a restraining order against her husband and he was removed from the dwelling lease at her request and placed on the trespass list. The female was offered the opportunity to transfer to another development but denied the transfer. Since the reported abuse by the female, she has requested that the husband be added to the dwelling lease. This request was denied since there is an outstanding restraining order. No specific details are provided in the plan due to privacy issues.

PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

Since the last Annual Plan was submitted, the follow changes were made: **1)** The ACOP and the Section 8 Administrative Plan were revised with an effective Date of March 1, 2011. The ACOP and the Section 8 Administrative Plan were revised to reflect changes made by HUD regarding the mandated use of the Enterprise Income Verification (EIV) System. HUD issued Notice PIH 2010-19 (HA) on May 17, 2010. This notice provided Public Housing Agencies guidance related to the mandated use of the EIV in accordance with the new HUD regulations, 24 CFR & 5.233, as issued in the Final Rule on December 29, 2009: Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs. Also, additional changes were made to the ACOP and Section 8 Administrative Plan to reflect the Violence Against Women Act Conforming Amendments; Final Rule was published in the Federal Register on October 27, 2010, and amends Section 24 CFR 960.103 and 960.203 ACOP and Section 24 CFR 982.53 and 982.201 of the Section 8 Administrative Plan as it pertains to the protections for victims of domestic violence, dating violence and stalking as it relates to the HA policy not evict public housing residents and/or terminate assistance for Section 8 participants or deny housing/assistance to these victims. The ACOP and the Section 8 Administrative Plan were also amended to state that, Form HUD-92006, Supplement to Application for Federally Assisted Housing, shall be completed as appropriate at admission and/or recertification and that this from shall remain confidential. Other clarification changes were made to the ACOP and

6.0

Section 8 Administrative Plan. All changes were posted in each Rental Office (for ACOP) and the Central Office at 422 Chestnut Street for review and comment on December 15, 2010 and comments were due by close of business February 15, 2011. Also, the Executive Director and key staff from the HA met with the Resident Association Presidents and representatives on Tuesday, December 14, 2010, and covered the details of the HA Plan elements that were being posted on December 15, 2010, for review and comment. The comment period ended on February 15, 2011 for the revised ACOP and Section 8 Administrative Plan and no comments were submitted. The revised ACOP and Section 8 Administrative Plan were presented to the Board of Commissioners on February 22, 2011, and approved effective March 1, 2011. 2) The Enterprise Income Verification (EIV) and Upfront Income Verification (UIV) policy of the HA was amended and approved by the Board of Commissioners on August 31, 2010, to reflect the changes contained in HUD Notice PIH 2010-19 and issued on May 17, 2010. The amended ACOP, Section 8 Administrative Plan and the EIV/UIV policy are filed with the supporting documents that are available for public review with the HA Annual and Five-Year Plan.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. The HA Central Office, located at 422 Chestnut Street, Gadsden, AL

PHA Plan Elements: No. 1 Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures for Public Housing and Section 8

A. Public Housing

(1) Eligibility

- a. The HA verifies eligibility for admission to public housing at the time the application is filed.
- b. The following non-income (screening) factors are used to establish eligibility for admission to public housing:
 - Criminal or Drug-related activity
 - Rental history
 - Housekeeping
 - Declaration of Citizenship, Owes Monies to any other Federally subsidized housing program, Subject to a lifetime registration requirement under state sex offender registration and/or Committed acts which constitute fraud during the application process. For additional information on non-income screening factors used by the HA, reference Section VI, Eligibility for Admission and Processing of Applications, Sections F thru L of the Admissions and Continued Occupancy Policy.
- c. The HA also requests criminal records from local, state law enforcement agencies for screening purposes and with authorized agency to access FBI criminal records for screening purposes.

(2) Waiting List Organization

- a. The waiting list is organized by, "Site-based waiting lists" and selection is made based on Date and Time of application and in strict compliance with the HA's Tenant Selection and Assignment Plan (TSAP) as outlined in Section VII of the ACOP.
- b. Persons may apply for admission to public housing at the HA's main administrative office at 422 Chestnut Street, Gadsden, AL
- c. The HA plans to operate one or more site-based waiting lists in this coming year as described below:
 - How many site-based waiting lists will the HA operate in the coming year? 7
The HA amended its annual plan for plan year 7/1/2004 and stated its intention to change to a site-based waiting list once the appropriate changes were posted and approved by HUD. The ACOP and Tenant Selection and Assignment Plan (TSAP) was amended, posted for comments and transmitted to HUD for approval on September 20, 2004. HUD approved the TSAP, including the site-based waiting lists on November 12, 2004. After receiving HUD approval the site-based waiting list was put into effect on December 1, 2004. Also, as specified by 24 CFR 903.7 (b) (2) (v) (B) of the Federal Regulations, the HA is required to use independent testers to assure that the site-based waiting list is not be implemented in a discriminatory manner and that no patterns or practices of discrimination exist. The HA hired the audit firm of Kendall L. Davis, PC to audit the HA's site-based waiting list for compliance with 24 CFR

903.7 (b) (2) (v) (B) for the FYI June 30, 2009. Kendall L. Davis, PC issued an Independent Auditor's Report and it was their opinion that the site-based waiting list is not being implemented in a discriminatory manner and no patterns or practices of discrimination exist. The Independent Audit Report was transmitted to the HUD Birmingham Office of Public Housing on January 15, 2010, and is on file for review with the list of supporting documents for review with the Annual & 5-Year Plan. HUD responded on January 28, 2010, and noted that the audit indicates that the HA site-based waiting lists are being implemented without discrimination and that the HA had completed the requirements for this reporting period. Also, as required by 24 CFR 903.7 (b) (2) (v) (B), the HA will contract with an independent auditor for the period ending June 30, 2012, to audit the site-based waiting list for non-discriminatory patterns or practices. This type of audit is required to be performed every three years for HA's that maintain a site-based waiting list.

- None of the HA's site-based waiting lists are new for the upcoming year.
- Families may be on more than one list simultaneously as follows:
The HA has a total of 7 developments and 5 are designated for occupancy by families. These developments are: Colley Homes, Carver Village, Emma Sansom Homes, Gateway Village and Northside Homes. The two remaining developments are Campbell Court and Starnes Park. There are 112 units at Campbell Court and 77 units at Starnes Park that have been approved by HUD for occupancy of the elderly and disabled for a total of 189. The occupancy type for these units was changed from family to mix-population (elderly and disabled) on August 18, 1995, which is the date HUD approved the change in occupancy type; therefore, the elderly, near-elderly and disabled are the only applicants for these developments. Also, two elderly and disabled unit were added with a DOFA date of March 31, 2010, and built with Housing Replacement Funds increasing the total from 189 to 191
- Interested persons can obtain more information about and sign up to be on the site-based waiting lists at the HA's main administrative office at 422 Chestnut Street, Gadsden, AL

(3) Assignment

- a. The applicants are given "one" choice for a vacant unit, if the unit is rejected, without good cause, the applicants fall to the bottom of the waiting list.
- b. This policy is consistent across all waiting list types.

(4) Admissions Preferences

a. Income targeting:

The HA plans to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income based on the Deconcentration Rule. To accomplish the deconcentration goals, the housing authority will take the following actions:

- At the beginning of each housing authority fiscal year, the housing authority will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the previous housing authority fiscal year.
- accomplish the goals of deconcentration:
 - (1) Not less than 40% of the HA admissions on an annual basis shall be to families that have income at or below 30% of area median income (extremely low-income), and
 - (2) The HA shall determine the average income of all families residing in all the HA's covered developments. The HA shall determine the average income of all families residing in each covered development. In determining average income for each development, this HA has adjusted its income analysis for unit size in accordance with procedures prescribed by HUD. The HA shall determine whether each of its covered developments falls above, within or below the Established Income Range. The Established Income Range is 85 percent to 115 percent (inclusive) of the average family income, except that the upper limit (115 percent) shall never be less than the income at which a family would be defined as

extremely low-income family.

b. Transfer policies:

The following take precedence over new admissions:

- Emergencies
- Underhoused
- Medical justification
- Administrative reasons determined by the HA (e.g., to permit modernization work)

c. Preferences –

The HA has established preferences for admission to public housing as described below:

- The HA has two “Special Circumstance Preferences” as outlined in Section VI – Eligibility for Admission and Processing of Applications, E – 5 of the ACOP– These preferences apply only to specific units 1) near-elderly families over other families for units designated for elderly/disabled in Campbell Court and Starnes Park and 2). For one bedroom units in any development; elderly and disabled families over single persons on the one bedroom eligible waiting list.
- Both “Special Circumstance Preferences” as described above, are absolute hierarchy preferences and they are given equal weight of 1 for first priority. The HA does not have any second or third priority preferences; therefore, “1” is the only hierarchy preference assigned.

(5) Occupancy

a. The following reference materials applicants and residents can use to obtain information about the rules of occupancy of public housing:

- The HA’s-resident lease
- The HA’s Admissions and (Continued) Occupancy policy
- HA briefing seminars or written materials

b. Residents must notify the HA of changes in family composition:

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision

(6) Deconcentration and Income Mixing

This Component complies with the information published in PIH Notice 2001-4, on 1/19/2001.

The HA has six developments covered by the deconcentration rule. As of 12/31/10, one development has average incomes above or below 85% to 115% of the average incomes as follows:

The developments are as follows:

Development Name: Colley Homes

Number of Units: 224

Explanation [§903.2(c)(1)(iv)]: The income average for Colley Homes is \$7,842.48 as of 12/31/10. The 85% of income average is \$9,717.78; therefore, Colley Homes is outside income range; however, the income average for Colley Homes increased from \$7,465.65 as of 12/31/09 to \$7,842.48 as of 12/31/2010.

Deconcentration policy [§903.2(c)(1)(v)]: The HA deconcentration policies are contained in the ACOP. The HA anticipates that this development will be within the income limits by June 30, 2014. The HA is currently marketing public housing units to the Hispanic community (in addition to marketing to all areas), which is the only low-income family population that is increasing in Etowah County. Also, these units have not been renovated since the early 1980’s and the HA plans to renovate these units in the future with Capital Funds. This is reflected in the HA’s Capital Fund Program-Five Year Plan. The HA staff will make every effort to have this development within the income ranges by June 30, 2014.

B. Section 8

(1) Eligibility

- a. The HA conducts the following screening to determine eligibility:
Criminal or drug-related activity only to the extent required by law or regulation; and,
- Declaration of Citizenship, Owes Monies to any other Federally subsidized housing program, Subject to lifetime registration requirement under state sex offender registration and/or Committed acts which constitute fraud during the application process. For additional information on screening factors used by the HA, reference Section VIII, Eligibility for Admission and Processing of Applications in the Section 8 Administrative Plan.
- b. The HA also requests criminal records from local, state law enforcement agencies for screening purposes and with authorized agency to access FBI criminal records for screening purposes
- c. The HA shares the following with prospective landlords:
- Criminal or drug-related activity: Drug-trafficking by family members; and,
 - If known by the HA, the tenancy history of family members (See Section XIII-C of the Section 8 Administrative Plan).

(2) Waiting List Organization

The HA waiting list contains the following information for each applicant listed:

- Applicant name;
- Family voucher size (number of bedrooms for which family qualifies under HA subsidy standards);
- Date and time of application;

All selections from the waiting list are made in accordance with the HA's Section 8 Administrative Plan, Section X, (C) Order of Selection from the waiting list as follows:

When a Housing Voucher assistance is available, the HA will select the family at the top of the waiting list. The order of admission from the waiting list MAY NOT be based on family size, or on the family unit size for which the family qualifies for under the HA subsidy standards. If the HA does not have sufficient funds to subsidize the family unit size of the family at the top of the waiting list, the HA MAY NOT skip the top family to admit an applicant with a smaller family unit size. Instead, the family at the top of the waiting list will be admitted when sufficient funds are available.

Provided, however, the provisions of the Deconcentration Rule, contained within this plan, shall supersede the selection of applicants based on date and time and local preference points, if applicable, and allow the HA to skip families on the waiting list to accomplish this goal.

Persons interested in applying for admission to the Section 8 Housing Choice Vouchers may apply at the main administrative office of the HA, located at 422 Chestnut Street, Gadsden, AL. However, the Section 8 waiting list is currently closed. As of 12/31/2010, there were 122 individuals/families on the Section 8 waiting list and based on the anticipated turnover of two (2) Housing Choice Vouchers per month it will be approximately two years before the Section 8 waiting list will be opened.

(3) Search Time The HA gives extensions on standard 60-day period to search for a unit as follows: When requests for extensions are received prior to the expiration date and the reason for the extension is justified (See Section XI D 2, Requesting for extensions of the term of the Section 8 Administrative Plan).

(4) Admissions Preferences

Income targeting: The HA plans to exceed the federal targeting requirement by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income based on the Deconcentration Rule. The Deconcentration Rule of the HA for Section 8 is contained in Section XXXVIII of the Section 8 Administrative Plan and reads as follows: The objective of the deconcentration rule for HCV tenant-based assistance is to admit no less than 75% of its new admissions to the program to families that have income at or below 30% of the area median income. The HA will track the status of all new admissions monthly by utilizing income reports generated by the HA's computer system. The goal will be tracked monthly and if the HA is not reaching its goal, families will be skipped on the waiting list to admit a family that has income that is at or below 30% of area median income. The practice will continue until the HA achieves its goal. The HA's HCV applicant selection process, which is contained in the HCV Administrative Plan provides for the skipping of families on the waiting list to accomplish this goal. The HA may also accomplish this goal by only opening the waiting list to families who fall at or below the

very-low income limits

(5) Special Purpose Section 8 Assistance Programs

a. The HA’s Section 8 Administrative Plan documents the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the HA.

b. The HA announces the availability of any special-purpose section 8 programs to the public as follows: Through published notices; and, for Section 8 Project-Based Housing Vouchers: The HA amended **SECTION X of the Section 8 Housing Voucher Selection and participation Process for the Plan Year beginning July 1, 2003**, and added part 3 to the Section 8 Administrative Plan. This amendment allows the HA to commit up to 20 percent of its allocated Section 8 Housing Choice Vouchers to Section 8 Project-Based Housing Choice Vouchers for use by the mentally ill and mentally retarded. The HA currently administers 112 Section 8 Housing Choice Vouchers; therefore, up to 22 vouchers may be used to assist the mentally ill and mentally disabled. Making provisions for project-based assistance will help fill a need for housing persons with mental disabilities in the HA jurisdiction. The HA established a separate waiting list for the project based vouchers and as specified in the Section 8 Administrative Plan and the applicants will be selected based on “date and time”. Section XII – D of the Section 8 Administrative Plan reads as follows: Section 8 Project-Based Housing Choice Vouchers: The HA may commit up to 20 percent of its allocated Section 8 Housing Choice Vouchers to Section 8 Project-Based Housing Choice Vouchers for use for persons with mental disabilities. The requirements of 24 CFR 983.51 and the Federal Register dated January 16, 2001, will be followed in the establishment of Section 8 Project-Based Housing Choice Vouchers. The HA will establish a separate waiting list for any project based vouchers and any applicant currently on the waiting list for a Section 8 Housing Choice Voucher that qualifies will be offered a Section 8 Project-Based Housing Choice Voucher. Also, if no individual or family with mental disabilities is on the project-based waiting list, the owner may provide documentation from the local Mental Health agency that no individual or family has been identified within the last 60 days that qualified for a project based voucher for the mentally disabled or mentally ill. At the end of the 60 day period, the owner may request that the HA offer a project based voucher to an individual or family on its regular waiting list for the Section 8 Housing Choice Voucher Program. After receiving the request, the HA may offer the next individual or family on the regular HA waiting list, based on the unit size of the vacant of the project based voucher, a project based voucher for that unit. The individual or family may accept or reject the project based voucher. If the individual or family rejects the project based voucher, the HA will offer the next individual or family the project based voucher based on the appropriate bedroom size; however, the family that rejects the project based voucher will not lose its place on the regular waiting list for a Section 8 Housing Choice Voucher. This process will be repeated until each individual or family on the regular waiting list is offered the project based voucher and/or until the project based voucher is leased.

PHA Plan Element: No. 2 - Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2010 grants)		
a) Public Housing Operating Fund	\$2,900,184	Day to Day Operations
b) Public Housing Fund, including ARRA Stimulus Funds	\$2,596,632	Capital & Management Improvements
c) Annual Contributions for Section 8 Tenant-Based Assistance –Section 8 Vouchers	\$388,836 \$ 67,731	Housing Assistance Payment Administrative Fee
3. Public Housing Dwelling Rental Income		
	\$1,634,603	Day to Day Operations
4. Other income (list below)		
	\$376,363	Day to Day Operations

Details of Other Income		
\$159,258 Excess Utilities		
\$ 22,680 Interest Income		
\$179,239 Main. Charges & late fees		
\$ 1,500 Power Pole Rental		
\$ 1,500 Salvage material		
\$ 12,186– Capital Fund operations		
\$376,363 – Total		
5. Non-federal sources (list below)	\$0	
Landmark Interest	\$961	
Total resources	\$7,965,310	

PHA Plan Element: No. 3 – Rent Determination

A. Public Housing

(1) Income Based Rent Policies

The HA’s income based rent setting policies for public housing including discretionary policies are as follows:

The HA employs discretionary policies for determining income based rent as described below:

a. Minimum Rent

- The HA’s minimum rent is currently \$50.00.
- The HA has adopted discretionary minimum rent hardship exemption policies. The HA dwelling lease outlines the policy of the HA as it relates to minimum rent hardship exemptions.

b. Rents set at less than 30% of adjusted income are as follows:

The HA has adopted flat rents as of October 1, 2002, and when the Head of Household selects the flat rent the amount charged is based on the established flat rent and not 30% of adjusted income. The approved flat rents are updated annually and the current rates were effective December 1, 2010. The flat rents are as follows: **Colley Homes:** 1 Br \$294, 2 Br \$362, 3 Br \$435, 4 Br \$572 and 5 Br \$690; **Carver Village:** 1 Br \$268, 2 Br \$316, 3 Br \$377, 4 Br \$478 and 5 Br \$626; **Emma Sansom Homes:** 1 Br \$262, 2 Br \$316, 3 Br \$387, 4 Br \$513 and 5 Br \$620; **Gateway Village:** 1 Br \$255, 2 Br \$308, 3 Br \$366, 4 Br \$462; **Campbell Court:** 1 Br \$287, 2 Br \$339, 3 Br \$404; **Starnes Park:** 1 Br \$287, 2 Br \$339, 3 Br \$404 and **Northside Homes:** 1 Br \$233, 2 Br \$281, 3 Br \$357.

c. The HA uses discretionary (optional) deductions and/or exclusions as follows:

- For the earned income of a previously unemployed household member (Ref. Appendix A Definitions section of ACOP for - Income Exclusions)
- For increases in earned income - (Ref. Appendix A Definitions section of ACOP for – Income Exclusions)
- TTP Deduction at Move-In: To help reduce the number of vacancies the HA amended the Admissions and Continued Occupancy Policy (ACOP) and added a permissive Total Tenant Payment (TTP) Deduction at Move-In on August 23, 2005, and effective September 1, 2005. HUD approved the permissive TTP deduction amendment to the ACOP on August 12, 2005. The ACOP was amended to provide for a TTP rent deduction, of up to two months, at initial move-in. The amendment is contained in Section XV - D (3) of the ACOP, and is summarized below:

Total Tenant Payment (TTP) Deduction at Move-In: The HA may deduct the TTP for any new move-in at certain development(s) (see worksheet below) that has a TTP of \$1 or more for up to two months at initial move-in (at this time the HA decided to grant a one month deduction and this action was approved at the August 23, 2005, Board meeting). Therefore, any eligible applicant for housing within a development that has a vacancy percentage of 2 percent or more qualifies to receive the one month TTP deduction. To be eligible for the TTP deduction the head of household and or any adult member listed on the dwelling lease must not have received this deduction at any time from the HA in the past. Also, the HA will determine when it is granting a one month or two month TTP deduction. The determination was made at this time that a one month TTP deduction is being allowed to evaluate its effectiveness in reducing vacancies. The HA has documented it=s decision to offer the TTP deduction for one month and the worksheet (listed below) is completed on the first working day of each

month and posted in each office of the HA. The HA may suspend and/or start the TTP deduction at any time based on the overall vacancy totals of the HA and/or the effectiveness of allowing the TTP deduction, which will be determined by the eviction rate of new move-ins that receive the TTP deduction and/or the number of applications received has increased and allowing the TTP deduction is not necessary for the HA to maintain an overall vacancy percentage of three percent or less. If the TTP deduction is suspended and/or started it will be done on the first working date of a particular month and all applicants that applied for public housing within a public housing development that qualified for a TTP deduction will be entitled to the TTP deduction even though they may not be housed until after the date the TTP deduction is suspended. The determining date for eligibility is the application date, not the date housed. Also, the decision to suspend the TTP deductions will be made on the first working day of each month, which is the date the worksheet (blank worksheet listed below) for the TTP deduction is posted. **Note:** The TTP deduction for Northside Homes was changed from one month to two months effective February 1, 2009, due to a 19% vacancy rate and Northside Homes has an operating loss as of December 31, 2008, was \$18,423.21. This change was approved by the Board of Commissioners on January 27, 2009 and all families on the HA waiting list were informed of the change. The vacancy rate for Northside Homes as of January 31, 2010, was 19% and the operating loss for this period was \$1,517.08; therefore, the TTP deduction remained at two months. **Update:** The vacancy rate for Northside Homes has improved over the last several months and as of January 31, 2011, there were only two (2) vacancies; therefore, the TTP deduction changed to one month, which is consistent with all other developments effective February 1, 2011. Applicants on the waiting list for Northside Homes were informed of this change.

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

MONTH _____ Year _____

Development Name	Units Available for Occupancy	Occupied Units	Vacancy Percentage
Colley Homes	220		
Carver Village	158		
Emma Sansom	219		
Gateway Village	106		
Campbell Court	150		
Starnes Park	102		
Northside Homes	42		
Totals	997		

NOTE: This is a blank chart and it is completed on the 1st working day of each month with actual vacancy data, which will indicate which development, qualifies for the TTP deduction.

d. Ceiling rents

The HA retained ceiling rents when the flat rents were adopted on October 1, 2002, and the ceiling rents are adjusted to the level of the flat rents on an annual basis as appropriate when the flat rents are adjusted and/or revised (see above for amounts of current flat rents). The ceiling rents are all developments. The HA adopted flat rents which were set on the market values of the units as established by a study conducted by the HA in accordance with HUD rules and regulations. The ceiling rents were retained and adjusted to the level of the flat rents as required by HUD. The flat rents are updated annually and the last updates were effective December 1, 2010. The flat rents are reviewed annually and the ceiling rents are adjusted to the level of the flat rents as appropriate.

e. Rent re-determinations:

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

(2) Flat Rents

In setting the market-based flat rents the HA contracted with a qualified firm to conduct a study based on HUD

regulations and surveying similar unassisted units in the neighborhood. The initial survey was completed and Flat Rents were implemented on October 1, 2002. The latest Flat Rents were updated and effective December 1, 2010. The Flat Rents will continue to be updated on an annual basis.

B. Section 8 Tenant-Based Assistance

(1) Payment Standards

a. The HA’s payment standard are set at 100% of FMR – Due the significant increase in FMRs for the Gadsden area effective October 1, 2004, the HA changed the Payment Standard from 110% to 100% of the FMR at the September 28, 2004, Board meeting and effective October 1, 2004. The payment standard has remained at 100% of the FMR since October 1, 2004, and they are reviewed annually.

b. The HA reevaluates the payment standards annually. The factors used by the HA in its assessment of the adequacy of its payment standard are 1) success rates of assisted families and 2) rent burdens of assisted families.

(2) Minimum Rent

a. The HA’s minimum rent is currently \$50.00.

b. The HA’s Section 8 Administrative Plan outlines the policy of the HA as it relates to minimum rent hardship exemptions.

PHA Plan Element: No. 4 – Operations and Management

A. HA Management Structure

The HA organization chart showing the HA’s management structure and organization is attached. See Attachment No. al049n01.

B. HUD Programs Under HA Management

The following programs are under HA Management:

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	1004	373
Section 8 Vouchers	112	21

C. Management and Maintenance Policies

Listed below are the public housing management and maintenance policy documents, manuals and handbooks that contain Agency’s rules, standards, and policies that govern maintenance and management of public housing, including a description of prevention or eradication of pest infestation (which includes cockroach infestation) and policies governing Section 8 management.

- Public Housing Maintenance and Management:
Ref: Public Housing Management Manual, Maintenance Operations Manual, Admissions and Continued Occupancy Policy, Dwelling Lease and Grievance Procedure
- Section 8 Management:
Ref: Section 8 Administrative Plan Manual

Note: The manuals listed above are filed and are available for review as backup for the Annual and Five-Year Plan at the main office of the HA at 422 Chestnut Street, Gadsden, AL.

PHA Plan Element: No. 5 – Grievance Procedures

A. Public Housing

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

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

B. Section 8 Tenant-Based Assistance

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

PHA Plan Element: No. 6 – Designated Housing for Elderly and Disabled Families

The HA applied for approval to designate certain units of public housing for occupancy only by the elderly families and families with disabilities. There are 112 units at Campbell Court and 77 units at Starnes Park that have been approved by HUD for occupancy of the elderly and disabled. The occupancy type for these units was changed from family to mix-population (elderly and disabled) on August 18, 1995, which is the date HUD approved the change in occupancy type; therefore, the elderly, near-elderly and disabled are the only applicants for these developments.

Designation of Public Housing Activity Description
1a. Development name: Campbell Court & Starnes Park 1b. Development (project) number: AL09P049005 for Campbell Court & AL09P049006 for Starnes Park
2. Designation type: Occupancy by only elderly families and families with disabilities
3. Application status Application Approved in 1995
4. Date this designation approved: August 18, 1995
5. Number of units affected by the designation: Campbell Court has a total of 150, there are 22 one bedroom units and 90 two bedroom units for a total 112 units in Campbell Court that have been designated for occupancy by the elderly and disabled. Starnes Park has a total of 100, there are 16 one bedroom units and 61 two bedroom units for a total 77 units in Starnes Park that have been designated for occupancy by the elderly and disabled. This represents a total of 189 units that have been approved for occupancy by the elderly and disabled. Update: The HA built 2 two bedroom units of elderly and disabled housing in the Starnes Park community with Housing Replacement Funds and these units were added to occupancy with a date of full availability on March 31, 2010. Therefore, the total for elderly and disabled increases from 189 to 191.

PHA Plan Element: No. 7 – Community Service and Self-Sufficiency

A. HA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

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

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

Also, the Executive Director has served on the Jobs Task Force with the Department of Human Resources since 1992 and he is the current President of the Jobs Task Force and actively participates in welfare to work programs with DHR staff and Jobs Task Force members. Also, effective October 2001 the Executive Director was appointed to the Board of Directors of the DHR Board for Etowah County by the County Commission and in January of 2003 he was elected Chairperson for the DHR Board of Directors and he continues to serve as Chairperson for the DHR Board.

B. Services and programs offered to residents and participants

1. Self-Sufficiency Policies

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

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

2. Economic and Social self-sufficiency programs

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

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / HA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
<i>Jobs Task Force</i>	<i>51</i>	<i>TANF recipients</i>	<i>HA Main Office and DHR</i>	<i>Both</i>
Community Development Center – Family Success Center	40	All low-income individuals	Operated out of Carver Village but available to all 7 Communities	Both
Reach-Out – Youth Program	50	All low-income individuals	Colley Homes	Both

C. Welfare Benefit Reductions

The HA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Adopting appropriate changes to the HA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies

D. Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937- NOTE: HUD reinstated the requirements of Community Service and Self-Sufficiency Requirements with the publication of NOTICE PIH 2003-17, and issued June 20, 2003

The HA reinstated the requirements of Community Service and Self-Sufficiency with the publication of HUD NOTICE PIH 2003-17, issued June 20, 2003. The HA amended its Dwelling Lease, Admissions and Continued Occupancy Policy and Community Service Policy at the July 29, 2003, Board meeting to comply with Section 12 of the United States Housing Act of 1937, as amended and outlined in Title 24 of the Code of Federal Regulations part 960 and Section 605. The HA issued a notice to all residents on July 17, 2003, informing all residents of Public Housing that HUD has reinstated the community service requirements. The HA requires all residents to comply with community service requirements and as of December 31, 2010, the HA has a total of 154 residents that have executed Community Service Agreements with the HA and of that total one (1) is on eviction notice for non-compliance.

PHA Plan Element: No. 8 – Safety and Crime Prevention

A. To ensure the safety of public housing residents

1. The HA analyzes the following to ensure the safety of public housing residents:
 - Incidences of violent and/or drug-related crime in some or all of the HA's developments
 - Incidences of violent and/or drug-related crime in the areas surrounding or adjacent to the HA's developments
 - Residents fearful for their safety and/or the safety of their children
 - Observed lower-level crime, vandalism and/or graffiti
 - People on waiting list unwilling to move into one or more developments due to perceived levels of violent and/or drug-related crime
2. The HA utilizes the following data to determine the need for HA actions to improve safety of residents:
 - Safety and security survey of residents
 - Analysis of crime statistics over time for crimes committed “in and around” public housing authority
 - Analysis of cost trends over time for repair of vandalism and removal of graffiti
 - Resident reports
 - HA employee reports
 - Police reports
 - Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
3. The developments that are affected the most are: Colley Homes - 224 units and Emma Sansom Homes – 220 units. These developments are the largest communities within the HA inventory. The other developments are Carver Village – 160 units, Gateway Village- 106 units, Campbell Court - 150 units, Starnes Park - 102 units and Northside Homes – 42 units for a total of 1,004.

B. Crime and Drug Prevention activities the HA has undertaken and plans to continue in the HA’s next fiscal year:

1. The crime prevention activities the HA has undertaken are as follows:
 - Contracting with the City of Gadsden Police Department for the services of five police officers to work exclusively within public housing. The program is called the Community Policing Program (COP). The COP program focus is on crime prevention and drug/gang prevention activities.
 - Works with non-profit organizations who work with at-risk youth, adults, or seniors anti-drug and gang activity programs
 - The HA also has Decorative Security fencing in Campbell Court, Gateway Village and Starnes Park and extra security lighting in all seven communities to help improve safety and security.
2. The developments that are affected the most are: Colley Homes - 224 units and Emma Sansom Homes – 220 units. These developments are the largest communities within the HA inventory. The other developments are Carver Village – 160 units, Gateway Village – 106 units, Campbell Court - 150 units, Starnes Park - 102 units and Northside Homes – 42 units for a total of 1,004.

C. Coordination between HA and the police

1. The HA coordinates with the City of Gadsden Police to carrying out crime prevention measures and activities as follows:
 - COP Officers are involved in the development, implementation, and/or ongoing evaluation of drug-elimination plan
 - COP Officers provide crime data to housing authority staff for analysis and action
 - COP Officers have established a physical presence on housing authority property by working exclusively in Gadsden’s public housing.
 - COP Officers regularly testify in and otherwise support eviction cases
 - COP Officers regularly meet with the HA management and residents
 - The HA executes an annual agreement with the City of Gadsden for policing services that are over and above the baseline law enforcement services required by the Cooperation Agreement.

2. The developments that are affected the most are: Colley Homes - 224 units and Emma Sansom Homes – 220 units. These developments are the largest communities within the HA inventory. The other developments are Carver Village – 160 units, Gateway Village– 106 units, Campbell Court - 150 units, Starnes Park - 102 units and Northside Homes – 42 units for a total of 1,004.

PHA Plan Element: No. 9 – Pets

The final rule concerning Pet Ownership in Public Housing was published in the federal register on July 10, 2000. The Birmingham HUD office had approved a Pet Policy governing the ownership of pets in public housing for Public Housing Authorities. This policy was posted for resident comment and presented to the Resident Advisory Board for review and comment. After modifying the Pet Policy to reflect comments made during the comment period the Pet Policy was adopted on August 29, 2000. The Admissions and Continued Occupancy Policy was amended to incorporate the pet policy. Also, approved was a Lease addendum for residents to execute that are approved for pet ownership. The HA Pet policy has been revised based on the model developed by the Policy Task Force. The primary revisions delete the requirements of having cats declawed and increase the weight limit of a cat to 20 pounds. The revised pet policy was approved by the Board of Commissioners on March 24, 2009.

PHA Plan Element: No. 10 – Civil Rights Certification

The HA can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. The Admissions and Continued Occupancy Policy and the Section 8 Administrative Plan have civil rights statements for compliance. The HA also conducts an annual self-evaluation for Section 504 compliance and has annual goals for meeting Section 3 objectives. It is the intent and practice of the HA to comply with all applicable Civil Rights laws and regulations. Discrimination of any type will not be tolerated by the HA. Required HA certification is attached (See attachment al049m01).

PHA Plan Element: No. 11 – Fiscal Year Audit

The HA is required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))

The Audit for the period ending June 30, 2010, was conducted by the firm of Kendall L. Davis, PC of Hazlehurst, GA. The audit was issued by Mr. Davis and mailed to the HUD Office of Public Housing, Birmingham, Alabama on November 30, 2010. The audit contained no findings and/or recommendations. The audit was transmitted to Mr. R. Edmond Sprayberry, Director Office of Public Housing on November 30, 2010. A response has not been received at of the March 22, 2011.

PHA Plan Element: No. 12 – Asset Management

The HA is engaging in activities that will contribute to the long-term asset management of its public housing stock, including how the Agency plans for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this HA Plan.

The HA has implemented project-based accounting and was fully operational for the period ending June 30, 2008.

The HA submitted its plan and rationale for the assignment of the Asset Management (AMP) identification numbers to Mr. Ed Sprayberry on April 18, 2006, for asset management. The HA decided to leave all developments as originally assigned by HUD and not group any developments. All employees, except the Executive Director, keep their time based on which community they are doing work and the expense charged to that particular development. The Executive Director charges the Central Office. The HA has implemented development-based or project based accounting for each of its seven developments, the Central Management Office and the Central Maintenance Office. The HA was fully operational with development-based or project based accounting for all developments, central management and central maintenance effective July 1, 2007. Also, Mr. Gregory A. Byrne, Director, Financial

Management Division, has informed the HA, via e-mail on July 12, 2006, as required under PIH Notice 2006-10, that the Identification of Projects for Asset Management for the Greater Gadsden Housing Authority was assigned new Asset Management Property (AMP) Grouping numbers. The correspondence also indicated that the, "new project identification are deemed to be reasonable and were approved."

PHA Plan Element: No. 13 – Violence Against Women Act (VAWA)

With the publication of HUD Notice 2006-23 and HUD Notice 2006-42 the HA established a goal that no individual covered under the VAWA that completes the certification to the alleged abuse and complies with the conditions of the certification will be evicted from public housing or have their Section 8 assistance terminated. This goal was added to the HA 5 Year Plan for the Fiscal Year beginning July 1, 2007 and any activity related to the eviction of victims covered under VAWA will be reported as updates to each 5 Year Plan submitted by the HA. The Board of Commissioners of the HA certified that the HA intends to comply with the implementing requirements of VAWA at the August 22, 2006, Board meeting.

The VAWA prohibits the eviction of, and removal of assistance from certain persons living in public or Section 8-assisted housing if the asserted grounds for such action is an instance of domestic violence, dating violence, sexual assault, or stalking as those terms are defined in Section 3 of the United States Housing Act of 1937 as amended by VAWA (42 U. S. C. 13925). The HA distributed a notice on July 31, 2006, to all Public Housing Households and a notice was mailed to all Section 8 participant households on July 21, 2006, informing them that the HA would not evict or terminate Section 8 assistance to victims of criminal domestic violence, dating violence, sexual assault, or stalking, as well as members of the victims' family listed on the dwelling lease and/or Section 8 voucher. The HA would only take action to have the person committing the violence removed from the dwelling lease and/or Section 8 voucher for the protection of the family. Based on the requirements contained in HUD Notice 2006-23, the HA developed a certification form for victims to certify that the alleged incident of abuse is bona fide and agrees to have the alleged abuser removed from the dwelling lease and/or the Section 8 Voucher. The HA will also allow the victim and remaining family members to relocate for safety reasons to another public housing development managed by the HA and/or issue the Section 8 participant family a Voucher, which will allow for relocation. To inform new public housing households and Section 8 participant households of the requirements of VAWA, the HA developed a notice that is covered with the Public Housing household and the Section 8 participant household during the leasing session effective August 1, 2006 for Public Housing lease sessions and July 24, 2006, for Housing Assistance Payment contracts executed on or after July 24, 2006. Each person participating in the lease session is also required to sign the notice that explains the requirements of VAWA. To ensure that Section 8 Landlords are aware of the requirements of VAWA, the HA mailed a notice to each Section 8 Landlord on July 21, 2006, which explained the requirements of VAWA. Also, for Housing Assistance Payment Contracts executed on or after July 24, 2006, the Landlord is provided a notice explaining the requirements of the VAWA and must sign the notice documenting that the HA has informed the Section 8 Landlord of the requirements of VAWA. HUD published an additional Notice: PIH 2006-42, on December 27, 2006, transmitting HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking, which is form HUD-50066. The HA starting using this certification form on February 1, 2007, for Public Housing and Section 8 and the certification form developed by the HA was changed and it is used as an attachment for form HUD-50066. A notice was posted for Public Housing and Section 8 on January 8, 2007, explaining that HUD has issued a certification for all acts covered by the VAWA Act of 2005 and that the existing certification form was amended and is being used as an attachment to HUD-50066. The VAWA Act of 2005 allows Housing Authorities to require additional information in addition to the certification and the attachments details what additional information the HA is requesting and the information being requested is in accordance with the VAWA Act of 2005. Also, the attachment is completed at the time the certification is completed.

On November 28, 2008, HUD published an interim rule on VAWA in the Federal Register and the Final Rule was published in the Federal Register on October 27, 2010. The final rule amends 24 CFR 903.6 (a) (3) {5-Year Plan Requirements} and 903.7 (m) (5) i, iii, iii {Annual Plan Requirements} requiring HA's to include a statement about goals, activities, objectives, policies, or programs that will enable the HA to serve the needs of a child and/or an adult "victim of domestic violence, dating violence, sexual assault and stalking". The HA works with local non-profit organizations that assist and provide shelter for domestic violence victims. The Executive Director is also the Chair of the Department of Human Resources (DHR) and he works closely with DHR representatives to ensure that any child and/or adult that is a victim of domestic violence, dating violence, sexual assault and stalking is reported to DHR immediately and corrective action taken to protect the child and/or adult and the victim is provided needed services. The GGHA also reports any violations of the VAWA to the City of Gadsden Police Department for action as appropriate. Based on information maintained by the HA for housing individuals that are victims of domestic

violence, we anticipate housing approximately 20 individuals/families for the period ending June 30, 2012 that may be victim of acts covered by the VAWA. The HA does not anticipate any problems in meeting the housing needs of any individual that that is a victim of domestic violence, dating violence, sexual assault and stalking and will be housed if all other eligibility requirements are met based on the current vacancies and the monthly turnover of all units administered by the HA. Processing applications takes approximately two weeks to complete and the shelters in the area work with the HA to provide temporary housing while the application is being processed. Also, the HA intends to comply with all provisions of the VAWA (See section 5.2 Goals and Objectives for update on meeting goals for VAWA).

Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. *Include statements related to these programs as applicable.*

A. Tax Credit Application for mixed financing project at Colley Homes: The HA submitted a Tax Credit Application for the renovation of Colley Homes on March 13, 2009 and the application was not funded. The HA was notified by letter dated June 8, 2009, that the Tax Credit application was not funded and the demand for tax credits far exceeded the supply, making the selection process a difficult one for the Alabama Housing Finance Authority. To prepare for submitting an application, the HA issued a Request for Qualification (RFQ) for a Development Partner on September 4, 2008, to prepare an application for Tax Credits for the Rehabilitation at Colley Homes. In response to the RFQ, the HA received two (2) proposals from the following firms: JEFFCO – Jefferson County Assisted Housing Corporation – Birmingham, AL and Olympia Construction, Inc., Albertville, AL. Based on the rating criteria contained in the RFQ for rating and ranking the proposals, the firm of Olympia Construction, Inc., scored the highest and this firm was approved by the Board of Commissioners to be the Development Partner and authorized a memorandum of understanding (MOU) to be executed. The MOU was executed on November 10, 2008. The RFQ indicated that the HA was seeking to procure a comprehensive real estate Development Team, including the developer itself, financial advisors, architects, and any necessary contractors. The RFQ also indicated that the HA will not play a substantial role in the development of the property but will seek for the Development Team to provide a “turnkey” operation. The RFQ also indicates that the Developer assumes the responsibility and costs for planning, preparing and submitting all applications and submissions necessary for the success of the project and provides all needed financial guarantees to secure equity investment into the project. The MOU specifies that the Developer will complete all needed documents to obtain HUD approval of the proposal and documents needed by the Alabama Housing Finance Authority and any other required documents on behalf of the HA for the Development. **Update:** The HA is not planning to submit another tax credit application in 2011 due to the poor market conditions. The Executive Director communicated the probability of the HA being funded if a Tax Credit application was submitted for 2011 with Mr. Butch Richardson of Olympia Construction. Mr. Richardson recommended that the HA not submit an application for 2011 due to the poor market conditions for funding a tax credit application. Mr. Richardson indicated that if the market conditions improve, the HA can apply for tax credits in 2012. This information was provided to the HA Board of Commissioners at the January 25, 2011 Board meeting and the Board agreed that the HA should not submit a tax credit application in 2011 and re-evaluate the market conditions in 2012. As reported in the July 1, 2010, Annual and Five-Year Plan the HA did not submit a Tax Credit application due to market conditions in 2010. This update was covered at each of the meetings in planning for the update of the annual and five-year plan of the HA.

A. Demolition application for Northside Homes: The HA wants to ensure that all public housing property is managed properly and is in decent, safe and sanitary condition and the HA can maintain an occupancy rate of 97% or more. With the submission of the Annual and Five Year Plan for the period beginning July 1, 2009, the HA indicated that it was analyzing the financial feasibility of maintaining Northside Homes, which is a 42 unit development that was built in 1983. The current Annual and Five Year plan includes the GGHA's plans to submit a demolition application for 30 units at Northside Homes. The demolition application was submitted to HUD, via the internet, on February 7, 2011. The GGHA had been planning to demolish units at Northside Homes since the initial planning meeting of December 9, 2008, with the City-Wide Resident Council. The GGHA wants to ensure that all public housing property is managed properly and is in decent, safe and sanitary condition. The GGHA has been analyzing the financial feasibility of maintaining Northside Homes in its present state, which is a 42 unit development that was built in 1983. As of December 31, 2008, Northside Homes had an operating loss of \$18,423.21. As of January 31, 2010, the operating loss for this period was \$1,517.08. As of December 31, 2010, there was an operating profit of \$7,816.20. Northside Homes would not be operating at a profit if the GGHA had not transferred \$25,000 of excess cash available from operations of Campbell Court and \$15,090 from the operations budget line item of Capital Fund 501-08 to help Northside Homes meet its financial obligations for the FYE June 30, 2009. Therefore, the GGHA has transferred a total of \$40,090 (\$25,000 + \$15,090) to Northside Homes to help this development operate at a

7.0

profit. Based on these negative trends, maintaining Northside Homes in its present condition is not financially feasible. After analyzing this development for three years, the GGHA is planning to demolish five (5) buildings, which contain thirty (30) units. The five (5) buildings are two story buildings and occupied by families. The remaining three (3) buildings and twelve (12) units are single story buildings and currently occupied by the elderly and disabled. These three (3) buildings are consistently under lease and the GGHA does not have any problems in keeping these units leased. However, in the five (5) buildings and thirty (30) units that are occupied by families consistently have vacancy problems. Over the past three years the thirty (30) units proposed for demolition have averaged a vacancy percentage of 13%, which is unacceptable. These units are the primary reason this development has financial problems. However, there are several other **IMPORTANT** factors that contribute to the decision to demolish these units. As stated above the units were built in 1983 and have not been renovated. They were built on a severe incline that provides almost no front or back yard for the residents and their children. The units were also built next to a large hill and this property has an erosion problem and dirt continues to slide down the hill and onto the HA property creating draining problems and constantly creates work to remove the dirt that fills the drainage ditch. During the last year the GGHA has removed approximately 25 tons of dirt from the drainage ditch. This also creates a problem with the Physical Inspection score from HUD's Real Estate Assessment Center (REAC) score for Northside Homes. The last physical inspection for Northside Homes was completed on June 10, 2010, and the physical inspection score was 24.5 out of a possible score of 30. The dirt in the drainage ditch was a deduction of 13.6 of a possible 16.3 for the site score, which is the score assigned to the grounds for Northside Homes. Therefore, if there was no drainage problem the GGHA would have scored approximately 28.56 out of 30. Also, when this development was built in 1983, all the utilities were owned by the utility company. This means that all residents are required to pay deposits to have their water, gas and electricity turned on prior to moving in the development. Since the GGHA has six other developments and a total of 962 units available for occupancy, the majority of family applicants choose to lease a unit in one of the other developments because they are only required to pay a gas deposit. The GGHA currently spends approximately \$50,000 to renovate a unit and committing approximately \$1,500,000 of Capital Funds to renovate thirty (30) units at Northside Homes does not make or represent a sound financial decision. Therefore, the GGHA is submitting a demolition application for approval for the demolition of five (5) buildings and thirty (30) units in Northside Homes. The HA has complied with all notice and regulatory requirements for submitting the demolition application. The current five-year plan for capital funds includes funds to demolish these buildings and units with funds allocated in Federal Fiscal Year 2011.

- B. Replacement Housing Plan (RHP) Funds: The HA has received five (5) allocations of replacement Housing Funds. The HA submitted a Replacement Housing Plan (RHP) on December 10, 2004, which was approved by HUD on January 28, 2005. Also, on January 3, 2007, a letter was transmitted to HUD requesting an Environment Review and approval of the HA development plan. The HA's RHP covers a period of ten years and to qualify for Federal Replacement funding the second five years of the plan the HA is committing \$99,520 of its non-profit funds to leverage federal funding for the second five years of the RHP. The HA's original plans were to construct 10 units of elderly and disabled housing on excess property located in Starnes Park, which is an elderly and disabled public housing community. The HA reported with the submission of its Annual and Five-Year Plan beginning 7/1/2009 that this may not be possible since funding has been reduced and construction cost has more than doubled since the initial plan was approved. The HA has implemented its RHP in phases. **Phase I** was to utilize the first three allocations of RHP, which we allocated as follows: \$74,640 for AL09R04950104 and \$70,899 for AL09R04950105, and \$63,391 for AL09R04950106 and Bonus allocation of \$1,873 for AL09R04950106. The original plan was to construct two duplexes consisting of four units of public housing for the elderly and disabled with funds provided with the first five increment of funding. The original estimate for the amount of RHF's to be received during the first five-year increments of funding was \$373,200 (\$74,640 initial allocation x 5 years). The GGHA's initial plan was to have an Architect develop all the plans and specifications and the site work completed and two duplexes built with the anticipated \$373,200. Through the allocation for AL09R049-50106 the HA has received \$210,803(AL09R049-50104 **\$74,640**; AL09R049-50105 **\$70,899**; AL09R049-50106 **\$63,391**, plus Bonus funding for AL09R049-50106 in the amount of **\$1,873 = \$210,803**) of RHF's.

The HA contracted with Patricia E. Sherman, Architect to prepare the plans and specifications for the site work and construction of five duplexes with a total of ten units. The complete project was advertised and sealed bids were received on September 12, 2006, with several deductive alternates. The low base bid to complete the total project was \$1,514,040, which equates to \$151,404 per unit. After taking all the alternates, the low bid for site work, excluding any paving and sidewalks, was \$239,090, which exceeded our allocation of RHF's by \$28,287 (\$239,090 - \$210,803). As part of the GGHA's Replacement Housing Funds

	<p>Plan, the GGHA committed \$99,520 of leveraged funds from its non-profit to qualify for the second increment of funding. To be able to award the bid of \$239,090, and meet the obligation date for AL09R04950104, the HA Board of Commissioners approved the use of a part of the funds committed to leverage federal funding to qualify for the second five years of RHF's. The contract for \$239,090 and the site-work was completed and all funds for AL09R04950104, 05 and 06 have been drawn down. The HA submitted the Actual Modernization Cost Certificates to HUD for the Close-out of AL09R049-501 04, 05 and 06 and HUD acknowledged receipt of the Actual Modernization Cost Certificates and that the programs were ready for audit on March 30, 2007. These letters were given to the auditor and they were informed that RFP projects were ready for audit for the period ending June 30, 2007. The audit has been issued and these projects have been closed. The Actual Cost Certificates were executed by HUD July 9, 2008 for AL09R049501- 04, 501-05 and 501-06; therefore, these programs are closed.</p> <p>PHASE II - The HA implemented Phase II of the RHP with the allocation of RHF for AL09R049 50107 on October 25, 2007 in the amount of \$64,890 and the fifth allocation for AL09R049501 08 on October 9, 2008, in the amount of \$66,256.00, for a total of \$131,146. As this project evolved it became more evident that funds would not be available to construct 10 units of elderly and disabled housing with the amount of funds that were being provided and due to the increases in construction cost. The Architect hired to develop the plans issued the plans and specifications to advertise for the complete project with deductive alternates. The HA opened the bids from four firms on Thursday, April 30, 2009, and based on the bids, the GGHA awarded the bid to Burch Corporation from Atlanta, Georgia to build one duplex with two units at a cost of \$187,778. As stated above, the HA has \$131,146 of replacement housing funds. The difference of \$56,632 (\$187,778-\$131,146) was paid from the operating reserve of the Starnes Park development. The total bid by Burch Corporation to complete the five duplexes and ten units was \$920,470. Based on the projected allocation of approximately \$67,000 per year of Replacement Housing Funds for the next five years for an estimated total of \$335,000, the GGHA would not have the funds necessary to continue the Replacement Housing Fund program with a projected shortfall of funding of \$585,470 (\$920,470-\$335,000). Based on these numbers, a letter was mailed to Mr. R. Edmond Sprayberry, Director Office of Public Housing on May 1, 2009, providing the current status of the RHP and requesting that additional allocations of RHF not be made to the HA. The HA did not execute the ACC for the AL09R049501-09 and does not plan to continue the RHP. The date of full availability for the two units developed with the RHF was March 31, 2010. The audit was completed for the period ending June 30, 2010 and AL09R049501-07 and 08 were included in the audit and HUD has approved the Actual Cost Certificates. Therefore, the RHF program for the HA is closed.</p>
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant. See attachment – al049h01 for AL09P04950111. Also, attached are the Capital Fund Program and Replacement Housing Fund Annual Statement/Performance and Evaluation Reports for all current and open CFP grants for the period ending December 31, 2010, as follows: CFP Grants: AL09P04950110- attachment al049i01 and AL09P04950109- attachment al049j01 and the Stimulus Grant Funds budget AL09S04950109 – attachment al049k01: All CFP grant funds and the Stimulus funds are on schedule and funds obligated and will expended prior to the deadline for obligating and expending the funds.</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. See attachment – al049l01.</p>
8.3	<p>Capital Fund Financing Program (CFFP).</p> <p><input checked="" type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. The HA participated in a Bond Sale approved by HUD and was issued a \$6,210,000 revenue bond in 2003. The revenue bond has a 20 year pay back schedule. The following amounts are due and will be paid from future the Capital Funds allocation as follows: FFY 2011 \$468,518.37, FFY 2012 \$466,598.85, FFY 2013 \$468,342.39, FFY 2014 \$464,222.80, FFY 2015 \$464,288.88, FFY 2016 \$463,925.70, FFY 2017 \$463,309.56, FFY 2018 \$488,916.77, FFY 2019 \$464,747.40, FFY 2020 \$461,912.78, FFY 2021 \$463,301.67 and FFY 2022 \$480,012.50.</p>
9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available</p>

data, the HA is making a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the HA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists.

A. Housing Needs of Families in the Jurisdiction Served by the HA

Based upon the information contained in the Consolidated Plan’s for the HA’ jurisdiction, the housing needs are contained in the following table. In the “Overall” Needs column, the estimated number of renter families that have housing needs. For the remaining characteristics in the table the HA does not have information available to rate these characteristics; therefore, N/A (not applicable) is noted since the HA cannot make this assessment.

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

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

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

Housing Needs of Families on the HA’s Waiting List is as follows:			
Listed below are the totals for the Public Housing and Section 8 Waiting list Combined			
	# of families	% of total families – 1,011 units leased	Annual Turnover- 394
Waiting list total	170	.168%	
Extremely low income <=30% AMI	170	.168%	
Very low income (>30% but <=50% AMI)	0	.0%	
Low income (>50% but <80% AMI)	0	.0%	
Families with children	101	.099%	
Elderly families	8	.007%	
Families with Disabilities	27	.027%	
Race/ethnicity	104	.103 %	Black
Race/ethnicity	64	.063 %	White
Race/ethnicity	0	0%	Other
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	55	.054%	
2 BR	72	.071%	
3 BR	39	.039%	
4 BR	4	.004%	
5 BR	0	0%	
5+ BR	0	0%	

The waiting list is currently open for Public Housing and closed for Section 8. As of 12/31/2010, there were 122 individuals/families on the Section 8 waiting list and based on the anticipated turnover of 2 Housing Choice Vouchers per month it will be approximately two years before the Section 8 waiting list will be opened.

The HA also has “Special Purpose Section 8 Assistance Programs – Section 8 Project-Based Vouchers: The HA may commit up to 20 percent of its allocated Section 8 Housing Choice Vouchers to Section 8 Project-Based Housing

Choice Vouchers for use for persons with mental disabilities. The requirements of 24 CFR 983.51 and the Federal Register dated January 16, 2001, will be followed in the establishment of Section 8 Project-Based Housing Choice Vouchers. The HA will establish a separate waiting list for any project based vouchers and any applicant currently on the waiting list for a Section 8 Housing Choice Voucher that qualifies will be offered a Section 8 Project-Based Housing Choice Voucher. Also, if no individual or family with mental disabilities is on the project-based waiting list, the owner may provide documentation from the local Mental Health agency that no individual or family has been identified within the last 60 days that qualified for a project based voucher for the mentally disabled or mentally ill. At the end of the 60 day period, the owner may request that the HA offer a project based voucher to an individual or family on its regular waiting list for the Section 8 Housing Choice Voucher Program. After receiving the request, the HA may offer the next individual or family on the regular HA waiting list, based on the size of the vacant unit for the project based voucher, a project based voucher. The individual or family may accept or reject the project based voucher. If the individual or family rejects the project based voucher, the HA will offer the next individual or family the project based voucher based on the appropriate bedroom size; however, the family that rejects the project based voucher will not lose its place on the regular waiting list for a Section 8 Housing Choice Voucher. This process will be repeated until each individual or family on the regular waiting list is offered the project based voucher and/or until the project based voucher is leased. **Current Status:** The HA currently has one Section 8 Project-Based Housing Voucher and the contact expires April 14, 2014. When this voucher expires, the family will be issued a Section 8 Housing Choice Voucher and the family can choose to remain in the existing unit and/or lease another unit that qualifies under the Section 8 Housing Choice Voucher Program.

Strategy for Addressing Housing Needs. The HA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year.

Strategy for Addressing Needs

The HA's strategy for addressing the housing needs of families in the HA's jurisdiction and on the waiting list for the upcoming year is as follows:

(1) Strategies

Strategy 1. The HA will maximize the number of affordable units available within its current resources by:

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- 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 HA, 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

Strategy 2: The HA will seek to increase the number of affordable housing units by:

- 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.

Strategy 3: The HA will also take the following actions to ensure that all individuals and families have access to affordable housing that complies with all fair housing laws units by:

- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Adopting rent policies to support and encourage work
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- 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 of areas of poverty /minority concentrations

(2) Reasons for Selecting Strategies

The HA's reasons for selecting strategies is influenced by:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the HA
- Influence of the housing market on HA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board

9.1

Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan. The HA is on schedule to meet and exceed the mission and twelve goals described above (see Section 5.1 and 5.2 for detailed description of mission and status of each goal).

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification" The HA's definitions are as follows:

Significant Amendment:

A "significant amendment or modification" to the Annual Plan would be a change to a statutory or regulatory HA requirement that requires prior approval from HUD. For example, a change in the "Tenant Selection and Assignment Plan" of the HA.

Substantial Deviation/Modification:

A "substantial deviation" to the 5-Year Plan is an overall change in the direction of the Authority pertaining to the Authority's mission and goals. For example, deleting an existing mission/goal or adding a new mission/goal for the HA would constitute a substantial deviation.

(c) HUD approved Conversion of Unit to Non-Dwelling Space and Removal of Units from Occupancy (See attachment al049o01).

(d) The Assessment of changes in racial, ethnic or disability-related composition at each site-based waiting list (See attachment al049p01). Brief Narrative of Assessment: The attachment (al049p01) documents that the overall occupancy trends in racial, ethnicity and disability have not been significantly affected by the establishment of site-based waiting list. There are some larger changes that appear higher than normal in Gateway Village for **all groups** but these changes were created by removing units from occupancy due to modernization. As of December 31, 2010, 38 units are under contract for renovation. Once the units are ready for occupancy and leased, the HA expects the occupancy to be close to the base line totals. These totals will be monitored by Housing Authority staff and updated with the submission of the 2012 Annual Plan. Also, the number of disabled housed has increased from a based line total of 254 to 368 as of December 31, 2010. As the population ages it would be expected that the number of disabled housed would increase. The HA is also pleased to report that the total Hispanic population increased from the base line total of 10 to 13 as of 12/31/10. The HA has established outreach programs for the Hispanic due to the overall population of Hispanic families increasing for Gadsden and Etowah County. The HA implemented site-based waiting lists effective December 1, 2004. The baseline data established by the Housing Authority was June 30, 2004, which represents the last date the data was available to establish a baseline prior to the implementation date of December 1, 2004. For the submission of this annual plan, the baseline is being compared to the current Multifamily Tenant Characteristic (MTCS) occupancy data as of December 31, 2010 (See attachment al049p01). Also, as specified by 24 CFR 903.7 (b) (2) (v) (B) of the Federal Regulations, the HA is required to use independent testers to assure that the site-based waiting list is not being implemented in a discriminatory manner and that no patterns or practices of discrimination exist. The HA hired the audit firm of Kendall L. Davis, PC to audit the HA's site-based waiting list for compliance with 24 CFR 903.7 (b) (2) (v) (B). Kendall L. Davis, PC issued an Independent Auditor's Report and it was their opinion that the site-based waiting list is not being implemented in a discriminatory manner and no patterns or practices of discrimination exist. The Independent Audit Report was transmitted to the HUD Birmingham Office of Public Housing on January 15, 2010, for their review. On January 28, 2010, staff of the Birmingham HUD Office of Public Housing issued a letter to the HA indicating that the HA had complied with the regulatory requirements for testing the site-based waiting list (The independent audit report and HUD's response to the HA are on file for review with the list of supporting documents for review with the Annual & 5-Year Plan). As required by 24 CFR 903.7 (b) (2) (v) (B), the HA will contract with an independent auditor for the period ending June 30, 2012, to audit the site-based waiting list for non-discriminatory patterns or practices. This type of audit is required to be performed every three years for HA's that maintain site-based waiting list.

(e) Comprehensive Security Plan: The HA has developed a comprehensive security plan to help ensure the safety of all public housing residents, guests and staff. The security plan is summarized as follows: The HA had contracted with the City of Gadsden for the services of eight police officers from February 1, 1993 through September 30, 2003, utilizing Public Housing Drug Elimination Program (PHDEP) funds. Since HUD discontinued the PHDEP program, the HA had to reduce the number of officers from eight to six effective October 1, 2003 and reduced that number to five officers effective October 1, 2008. The security program is funded utilizing operating funds. Also, some Capital

10.0

Funds are allocated to the COP program in the annual and five year plan budget. The HA has also implemented the stricter screening and eviction provisions to comply with the federal requirements of the “One-Strike and You’re Out” rule. The implementation of stricter screening policies help keep criminals out of public housing and the swift eviction of residents involved with criminal activity helps keep criminal activity at a minimum. The HA and the City of Gadsden execute a contract each year for the exclusive services of five police officers and the contract outlines the security plans for the HA and Police Department. The program is referred to as the Community Oriented Policy (COP) program and the officers are referred to as COP officers. This program is nationally known and has won two awards from the National League of Cities for Community Policing. The contract is filed with the list of supporting documents for the Annual and Five Year Plan and is available for review. The Police Officers generate daily reports and these reports are reviewed by the Public Housing Coordinator (PHC) and the PHC determines if any action is needed as it relates to criminal activity of a resident. Also, the Executive Director is updated by the Sergeant in charge of the COP Officers and PHC of any security issues that need to be addressed and the Executive Director take the appropriate action. The Sergeant in charge of the COP Officers also generates a monthly report by development and this information is summarized and provided to the Executive Director. The Executive Director generates a report by development and the criminal activity is analyzed to determine if appropriate security measures are being taken (See Goal VIII above for HA goals related to security in Section 5.2 above). HUD has also approved the Performance Funding System (PFS) waiver through June 30, 2012, for a unit in Colley Homes that is used as a police sub-station. HUD has also approved a PFS waiver for a unit in Emma Sansom Homes that is used as a residence for a Police Officer. The Police Officer provides security for this development when he is off duty and provides monthly reports to the Executive Director. Colley Homes (224 units) and Emma Sansom Homes (220 units) are the largest developments managed by the HA and the additional Police presence reduces crime, which helps make the communities a safe place to live.

11.0 Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights) **See attachment – al049a01**
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only) **See attachment – al049b01**
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only) **See attachment – al049c01**
- (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only) **See attachment – al049d01**
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only) **See attachment – al049e01**
- (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. **See attachment – al049f01**
- (g) Challenged Elements – **No Elements of the HA’s plan has been challenged; therefore, a negative report is attached. See attachment – al049g01**
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (PHAs receiving CFP grants only) **See attachment – al049h01 – also attached are the CFP for all open programs as of 12/31/10 – see attachment al049i01 and al049j01 and attachment al049k01 for the stimulus HUD-50075.1 (also see section 8. 1 above).**
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only) **See attachment – al049l01**

Also attached is the required “Civil Rights” Certification: See attached Board Resolution containing the required certification – al049m01. Also see PHA Plan Element: No. 10 – Civil Rights Certification information above. Other Attachments are: al049n01 = Organizational Chart; al049o01 = HUD approved Unit Conversion Information; al049p01 = Site-based waiting list demographics.

Mayor Sherman Guyton, City of Gadsden, has executed the “Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan” and this document is on file at the HA with all the Annual & Five Year Plan documents, which are available for review.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. 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 and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected.
7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

PHA Certifications of Compliance with PHA Plans and Related Regulations	U.S. Department of Housing and Urban Development Office of Public and Indian Housing Expires 4/30/2011
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**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

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 X Annual PHA Plan for the PHA fiscal year beginning 7/1/11, 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 certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (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.
5. 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.
6. 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.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address 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 maintain records reflecting these analyses and actions.
8. For PHA Plan 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 2006-24);
 - 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 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 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).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. 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.
11. 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.

12. 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.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. 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.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. 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.
18. 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).
19. 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.
20. 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.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Greater Gadsden Housing Authority
PHA Name

AL049
PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 2011 - 2016

Annual PHA Plan for Fiscal Years 2011 - 2012

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
M. Todd Hindsman	Board Chairperson
Signature	Date
	March 22, 2011

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

a1049601

Applicant Name

Greater Gadsden Housing Authority

Program/Activity Receiving Federal Grant Funding

Capital Funds

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

- (1) The dangers of drug abuse in the workplace;
- (2) The Applicant's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

- Colley Homes, 400 N. 6th St., Gadsden, AL
- Carver Village, 1109 Jacksonville Ct., Gadsden, AL
- Emma Sansom Homes, 2200 White Av., Gadsden, AL
- Gateway Village, 1319 Walnut St., Gadsden, AL
- Campbell Court 100 Campbell Ct., Gadsden, AL
- Starnes Park, 601 Starnes Park, Gadsden, AL
- Northside Homes, 501 Tuscaloosa Av, Gadsden, AL

NOTE: All sites are located in Etowah County

Check here if there are workplaces on file that are not identified on the attached sheets.

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

A. Wayne East

Title

Executive Director

Signature

X *A. Wayne East*

Date

March 22, 2011

**Certification of Payments
to Influence Federal Transactions**

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

a1049c01

Applicant Name

GREATER GADSDEN HOUSING AUTHORITY

Program/Activity Receiving Federal Grant Funding

CAPITAL FUNDS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

A. WAYNE EAST

Signature

A Wayne East

Title

EXECUTIVE DIRECTOR

Date (mm/dd/yyyy)

March 22, 2011

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

DISCLOSURE OF LOBBYING ACTIVITIES
CONTINUATION SHEET

Approved by OMB
0348-0046

a1049e01

Reporting Entity: Greater Gadsden Housing Authority Page 1 of 1

No Lobbying Activities to Report

A. Wayne East

A. Wayne East
Executive Director *March 22, 2011*

Comments of Resident Advisory Board (RAB) and other Residents made during the time period the Annual and 5 year plan was being revised for the Housing Authority (HA). The HA staff has worked with its residents and the Resident Advisory Board to revise the annual and five year plan. The HA has seven developments and since 1992 there have been active resident associations in each development. The president's from each resident association serves on the Resident Advisory Board. Each Resident Association meets on a monthly basis and the Advisory Board meets with the Executive Director and key staff on a quarterly basis and they review all policies related to occupancy of public housing and provide input and suggestions prior to the adoption of all policies. The Resident Association Presidents names and developments are as follows: From Colley Home's 49-1, Ms. Lovie Ivey, From Carver Village 49-2, Ms. Valerie Dudley; From Emma Sansom Homes 49-3, Ms. Elaine Jones; From Gateway Village 49-4, Ms. Cecile Taylor Vice-President; From Campbell Court 49-5, Mr. Gene Knight, From Starnes Park 49-6, Ms. Sandra Baker; and, From Northside Homes 49-8, Ms. Margaret Edwards. These residents comprise the members of the Resident Advisory Board (RAB). The HA has a Section 8 Voucher Program of 112 units. According to PIH Notice 2000-36, PHAs of significant size must ensure that families receiving tenant-based assistance are reasonably represented on a RAB. Significant size is defined as 20 percent of the total of the PHA's public housing and Section 8 tenant-based assistance units. The HA has a total of 1,116 (1,004 public housing and 112 Section 8). Therefore, the Section 8 program represents 9.96% of the total ($1,116/112=9.96\%$). Since the total is less than 20% there is no Section 8 representative on the RAB. However, the HA made significant efforts to solicit comments for all Section 8 participants. Each Section 8 participant was mailed a notice on Tuesday, January 18, 2011, which informed the participants of the annual and 5 year planning process and scheduled a meeting for all participants on Thursday, February 10, 2011, to review the annual and 5-year plan and solicit comments and participation from the Section 8 participants. The Executive Director the Annual and Five year Plan. One Section 8 participant attended the meeting. The mission of the plan which specifies the agency goals and objectives for the next five years were discussed. The Executive Director also covered the changes to the Section 8 Administrative Plan, which were posted for comment. The Section 8 participant expressed that she was satisfied with the way the program was administered and had no comments relative to the Annual and Five year plan.

To involve all public housing resident in the revision process of the annual and 5 year plan, one meeting was held in each public housing community, for a total of 7 meetings, to solicit comments from all public housing residents. In addition to the 7 meetings held in each community, the Executive Director and key staff held two meetings with the Resident Advisory Board. The first meeting was held on December 14, 2010, and the second meeting was held on March 8, 2011, for the purpose of obtaining comments and suggestions. To complete the comment process and solicit input and comments from the general public the HA advertised in the Gadsden Times on January 18, 2011, that the annual and 5 year plan was available for review and the HA was soliciting comments on the plan and that a public hearing is scheduled for Tuesday, March 8, 2011, to review and comment on the annual and

5 year plan. Also, on January 18, 2011, a letter was mailed to Legal Services Corporation of Alabama requesting that they review and comment on the annual and 5 year plan. A notice was also mailed to all Section 8 participants on March 2, 2011, and delivered to all public housing residents on March 2, 2011, to remind the participants and residents of the public hearing. To ensure that the general public and all interested parties were reminded of the public hearing, ads were placed in Gadsden Times on March 2, 2011, and March 6, 2011, notifying the general public of the upcoming public hearing on Tuesday, March 8, 2011. Also, public service announcements were aired on three local radio stations advertising the Public Hearing of March 8, 2011.

Participation was good in the eleven (11) meetings held to discuss and review the annual and 5 year plan. A total of 130 people attended the meetings and the overall comments were positive, constructive and supportive of the HA's plan.

Mr. East covered the current annual and long range plans of the GGHA. Mr. East stated that this is the third year we have discussed the demolition of 30 units at Northside Homes and this information has been included in the last two PHA plans. The GGHA has offered to sale the 30 units to each Resident Association and to the City-Wide Resident Council. None of the Resident Associations and or the City-Wide Resident Council expressed any interest in buying the units. Therefore, the GGHA submitted the demolition application to HUD on February 7, 2011. If the demolition approved, the GGHA will advertise for an Architect to develop the plans and specifications for the demolition of the five buildings and renovation of the twelve units that will not be demolished. Once the buildings are demolished the area will be landscaped and trees planted. Also, residents will be allowed to transfer to other GGHA communities based on bedroom size needed and availability. The GGHA is currently renovating units in Gateway Village and these units should be available of occupancy at the time the demolition application is approved and residents that currently live in the 30 units at Northside Homes will have the opportunity to transfer to Gateway Village, if they qualify for that unit size. The GGHA will move the residents and/or the resident will be given funds to move themselves. It will be the choice of the Resident. This will process will start after HUD approves the demolition application. It is anticipated that we should receive HUD approval and/or disapproval in August of 2011.

Following this discussion, Mr. East covered the details of the Annual Plan – HUD-50075.1, which is to renovation of 12 units at Northside Homes and demolition of 30 units.

Following this topic, Mr. East covered the details of the Five Year Plan – HUD-50075.2 – Renovation of Colley Homes, 1st all Buildings will be roofed with metal roofing and when this is completed we will start the renovations of dwelling units. It will take several years to completely renovate Colley Homes.

Also, the GGHA may submit a Tax Credit application in 2012 to help with the renovation of Colley Homes if the economic conditions are better and there is a possibility of being funded. The GGHA applied in 2009 and the application was not funded.

Following these topic, Mr. East covered the changes to the Admissions and Continued Occupancy Policy (ACOP). Notices were distributed on December 15, 2010 informing all residents that the ACOP was being revised and the changes are posted in each rental office for review and comment. All comments were to be received no later than close of business February 15, 2010 and no comments were received. The revisions were effective March 1, 2011. Mr. East stated that one of the main changes was that HUD has mandated the use of the Enterprise Income Verification (EIV) system. Resident must report all income to ensure that they do not have to repay retro rent based on unreported income and face eviction if fraud is committed. All funds must be repaid before an individual could be housed in any Public and/or Federal Housing. We explain this to all new residents and existing resident but we continue to have cases of unreported income that is discovered using the EIV system.

Summary of Comments: As noted above there were a total of eleven (11) meetings held to discuss the annual and five year plans of the HA. Minutes were taken for each meeting. There were several questions concerning general occupancy and maintenance and each question was responded to and follow-up on, if necessary.

Overall the comments were positive and the residents support the annual and five-year plan of the HA.

Attachment: al049g01

Greater Gadsden Housing Authority

(g) Challenged Elements:

No element(s) have been challenged regarding the HA plan.

Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Date of CFFP: _____		Replacement Housing Factor Grant No: _____	
				FFY of Grant: _____ FFY of Grant Approval: _____	
Type of Grant					
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: _____)					
<input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____ <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)				
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part I: Summary				
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Date of CFFP: _____		Replacement Housing Factor Grant No: _____
				FFY of Grant: _____ FFY of Grant Approval: _____
Type of Grant				
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹
		Original	Revised ²	Obligated Expended
Signature of Executive Director		Date		Signature of Public Housing Director Date

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Date of CFFP: _____		Replacement Housing Factor Grant No: _____	
				FFY of Grant: _____ FFY of Grant Approval: _____	
Type of Grant					
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)				
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part I: Summary				
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Date of CFFP: _____		Replacement Housing Factor Grant No: _____
				FFY of Grant: _____ FFY of Grant Approval: _____
Type of Grant				
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)
<input type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/2010		<input type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹
		Original	Revised ²	Obligated Expended
Signature of Executive Director		Date		Signature of Public Housing Director Date

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Date of CFFP: _____		Replacement Housing Factor Grant No: _____	
				FFY of Grant: _____ FFY of Grant Approval: _____	
Type of Grant					
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: _____)					
<input type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)				
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

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Part I: Summary				
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Replacement Housing Factor Grant No: _____ Date of CFFP: _____		FFY of Grant: _____ FFY of Grant Approval: _____
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: _____) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <u>12/31/2010</u> <input type="checkbox"/> Final Performance and Evaluation Report				
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹
		Original	Revised ²	Obligated Expended
Signature of Executive Director		Date	Signature of Public Housing Director	Date

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Replacement Housing Factor Grant No: _____ Date of CFFP: _____			FFY of Grant: _____
Type of Grant		<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: 12/31/2010 <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
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21	Amount of line 20 Related to LBP Activities				
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23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

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Part I: Summary				
PHA Name:		Grant Type and Number Capital Fund Program Grant No: _____ Replacement Housing Factor Grant No: _____ Date of CFFP: _____		FFY of Grant: _____ FFY of Grant Approval: _____
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: _____) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <u>12/31/2010</u> <input type="checkbox"/> Final Performance and Evaluation Report				
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹
		Original	Revised ²	Obligated Expended
Signature of Executive Director		Signature of Public Housing Director		Date
		Date		

Capital Fund Program—Five-Year Action Plan

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Expires 4/30/20011

A1049101

Part I: Summary		Locality (City/County & State)		X <input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:		
PHA Name/Number Greater Gadsden Housing Authority AL049		Gadsden, Etowah, Alabama				
A.	Development Number and Name	Work Statement for Year 1 FFY <u>2011</u>	Work Statement for Year 2 FFY <u>AL09P049501011-2012</u>	Work Statement for Year 3 FFY <u>AL09P049501012-2013</u>	Work Statement for Year 4 FFY <u>AL9P049501013-2014</u>	Work Statement for Year 5 FYAL <u>09P049501014-2015</u>
	Colley Homes 49-1		\$1,016,245.00	\$1,016,245.00	\$1,016,245.00	\$1,016,245.00
	Carver Village 49-2		\$0.00	\$0.00	\$0.00	\$0.00
	Emma Sansom Homes 49-3		\$0.00	\$0.00	\$0.00	\$0.00
	Gateway Village 49-4		\$0.00	\$0.00	\$0.00	\$0.00
	Campbell Court 49-5		\$0.00	\$0.00	\$0.00	\$0.00
	Starnes Park 49-6		\$0.00	\$0.00	\$0.00	\$0.00
	Northside Homes 49-8		\$0.00	\$0.00	\$0.00	\$0.00
B.	Physical Improvements Subtotal	Annual Statement	\$1,016,245.00	\$1,016,245.00	\$1,016,245.00	\$1,016,245.00
C.	Management Improvements		\$1,000.00	\$1,000.00	\$1,000.00	\$1,000.00
D.	PHA-Wide Non-dwelling Structures and Equipment		\$0.00	\$0.00	\$0.00	\$0.00
E.	Administration		\$120,753.00	\$120,753.00	\$120,753.00	\$120,753.00
F.	Other—Relocation Cost A & E Fees		0.00 \$51,000.00	\$3,000.00 \$51,000.00	\$5,400.00 \$51,000.00	\$5,400.00 \$51,000.00
G.	Operations		\$19,276.15	\$14,532.61	\$16,252.20	\$16,186.12
H.	Demolition		\$0.00	\$0.00	\$0.00	\$0.00
I.	Development		\$0.00	\$0.00	\$0.00	\$0.00
J.	Capital Fund Financing – Debt Service		\$466,598.85	\$468,342.39	\$464,222.80	\$464,288.88
K.	Total CFP Funds		\$1,674,873.00	\$1,674,873.00	\$1,674,873.00	\$1,674,873.00
L.	Total Non-CFP Funds					
M.	Grand Total		\$1,674,873.00	\$1,674,873.00	\$1,674,873.00	\$1,674,873.00

Capital Fund Program—Five-Year Action Plan

Expires 4/30/20011

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY _____	Work Statement for Year <u>2</u> FFY <u>AL09P049501011-2012</u>			Work Statement for Year: <u>3</u> FFY <u>AL09P049501012-2013</u>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Colley Homes			Colley homes		
Annual Statement	AL 49-1			AL 49-1		
	Operations 1406		\$19,276.15	Operations 1406		\$14,532.61
	Mgt. Imp/Police Patrol 1408		\$1,000.00	Mgt. Imp/Police Patrol 1408		\$1,000.00
	Admin - 1410			Admin – 1410		
	Management Fees		\$120,753.00	Management Fees		\$120,753.00
	Fees & Costs 1430			Fees & Costs 1430		
	A & E Fees		\$51,000.00	A & E Fees		\$51,000.00
	Dwelling Structures 1460			Dwelling Structures 1460		
	Reroofing of 37 Buildings	37 buildings	\$1,016,245.00	Reroofing of 12 Buildings	12 Buildings	\$329,592.00
	Remove old shingles			Remove old shingles		
	Install a metal roof			And install a metal roof		
	Subtotal of Estimated Cost		\$1,208,274.15	Subtotal of Estimated Cost		\$516,877.61

Capital Fund Program—Five-Year Action Plan

Expires 4/30/20011

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY _____	Work Statement for Year 2 FFY AL09P04950110-2012			Work Statement for Year: 3 FFY AL09P04950112-2013		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Colley Homes AL 49-1 (Continued)			Colley Homes AL 49-1 (Continued 1460)		
Annual Statement	New facer and soffit for all buildings – one building will be the old shop and the rental office, pro –care building, and the warehouse. Porches will also get new soffit, and metal on gables on porches			New facer and soffit for all buildings – one building will be the old shop, the rental office, pro care building, and the warehouse. All porches with receive new soffit and new metal on the gable ends.		
				Renovation of 14 units		
				Gutting Units	14	\$28,000.00
				Modernize kitchens	14	\$98,000.00
				Modernize bathrooms	14	\$70,000.00
				Replace the HVAC	14	\$98,000.00
				Replace floor tile & Base, install sound	14	\$2,800.00
				Paneling	14	\$77,353.00
				Replace water heaters	14	\$10,500.00
				Replace all electrical wires	14	\$196,000.00
				New plumbing	14	\$50,000.00
				Relocation Costs 1495.1	14	\$3,000.00
	Bond Payment 1501	1	\$466,598.85	Bond Payment 1501	1	\$468,342.39
	Subtotal of Estimated Cost		\$1,674,873.00	Subtotal of Estimated Cost		\$1,674,873.00

Part II: Supporting Pages – Physical Needs Work Statement(s)

Capital Fund Program—Five-Year Action Plan

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Expires 4/30/20011

Work Statement for Year 1 FFY	Work Statement for Year <u>4</u> FFY <u>AL09P04950113-2014</u>			Work Statement for Year: <u>5</u> FFY <u>AL09P04950114-2015</u>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Colley Homes AL 49-1			Colley Homes AL 49-1		
Annual Statement	Operations 1406		\$16,252.20	Operations 1406		\$16,186.12
	Mgt. Imp/Police Patrol 1408		\$1,000.00	Mgt. Imp/Police Patrol 1408		\$1,000.00
	Admin. - 1410			Admin - 1410		
	Management Fees		\$120,753.00	Management Fees		\$120,753.00
	Fees and Costs 1430			Fees and Costs 1430		
	A & E Fees		\$51,000.00	A & E fees		\$51,000.00
	Dwelling Structures 1460			Dwelling Structures 1460		
	Renovation of 21 Units			Modernize 21 units		
	Gutting Units	21	\$42,000.00	Gutting units	21	\$42,000.00
	Modernize Kitchens	21	\$168,000.00	Modernize kitchens	21	\$168,000.00
	Modernize Baths	21	\$136,500.00	Modernize baths	21	\$136,500.00
	Replace HVAC System	21	\$147,000.00	Replace HVAC System	21	\$147,000.00
	Subtotal of Estimated Cost		\$682,505.20	Subtotal of Estimated Cost		\$682,439.12

21049 MO1

Civil Rights Certification

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

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 if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan 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.

Greater Gadsden Housing Authority

AL049

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

M. Todd Hindsman

Title

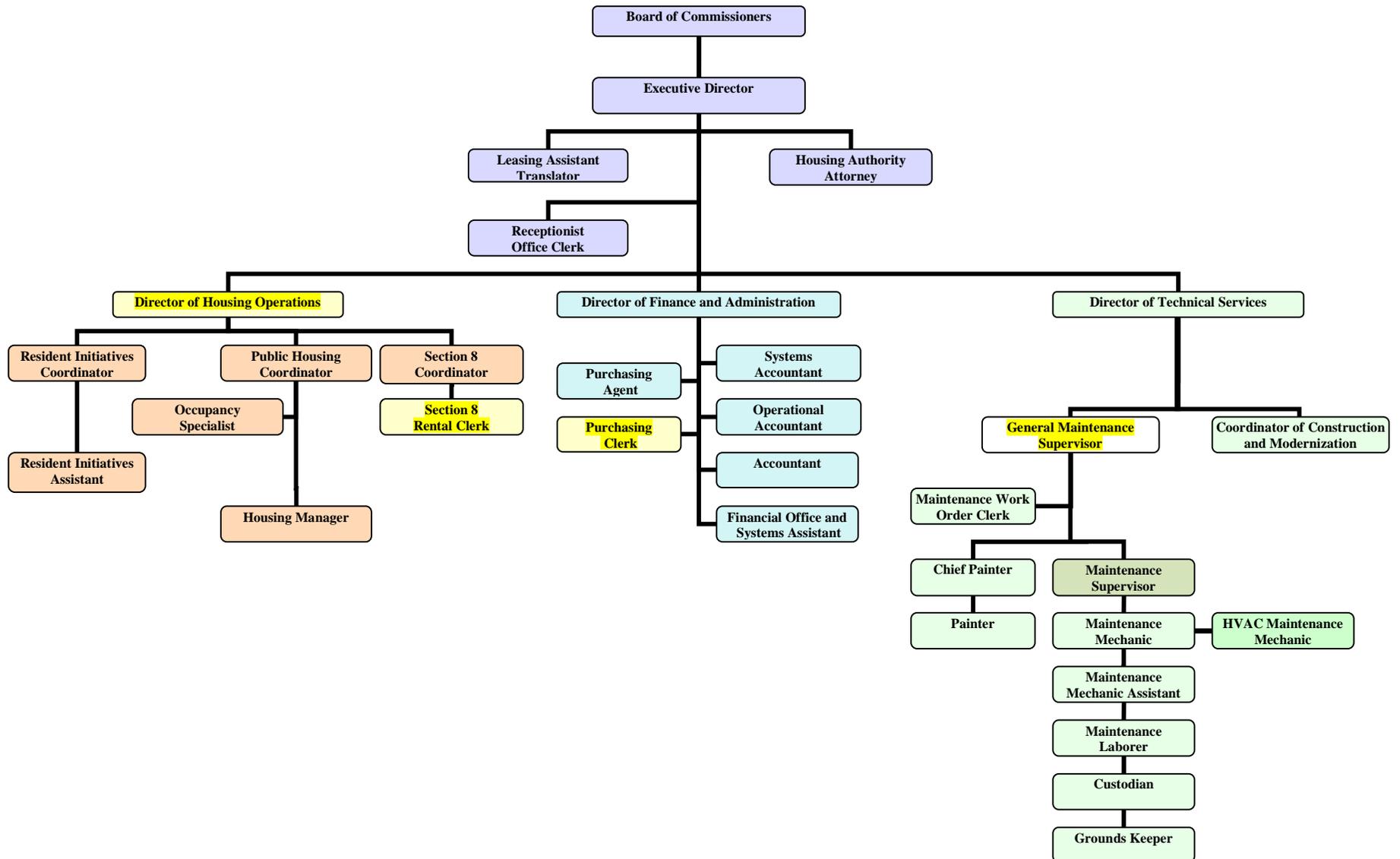
Board Chairperson

Signature

Date

March 22, 2011

GREATER GADSDEN HOUSING AUTHORITY
Organizational chart – Attachment AL049n01



Vacant

Greater Gadsden Housing Authority
Section 10 (c) – Additional Information
Unit Conversion Information

10 (c) Additional Information: On January 20, 2009, a letter was transmitted to HUD requesting that the approval of the Performance Funding System waiver from July 1, 2009 until June 30, 2012, for the following units:

<u>Development Name:</u>	<u>Address:</u>	<u>Purpose:</u>
Colley Homes	418-A North 6 th Street	Police Sub-station/office
Colley Homes	406-A North 6 th Street	Resident Services: Resident Association Meetings/Tax Utility Assistance/Meal Assistance
Colley Homes	310-A North 6 th Place	Reach Out-Youth Programs – Drug Prevention & Education
Colley Homes	414-A North 6 th Street	City-Wide Resident Council/ Newsletter Production Office
Carver Village	1116-A Jacksonville Ct.	Self-sufficiency program: Home ownership / Budget Counseling- Family Success Center
Carver Village	1112-D Tuscaloosa Ave.	Self-sufficiency program: Adult Education / Job Fairs / Training Programs - NAACP
Emma Sansom Homes	2313-D White Ave	Police Residence

HUD approved the waiver request for the PFS units listed above on February 9, 2009, from July 1, 2009 until June 30, 2012:

According to the Federal Regulation published March 29, 2000, Section 960.505 (b) states that the annual plan or supporting documents must include the number and location of units to be occupied by police officers. This attachment provides the required information and is contained in section 10 C of the annual plan.

AL049p01 Other Information D-2:Site-Based Waiting List Demographic Characteristics
Date Initiated – 12/01/04 This report is being updated for Current Mix as of 12/30/10

Colley Homes AL049001 400 N. 6 th St., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	85	119	28.57%
Black	239	384	37.76%
American Indian	0	0	0
Asian	0	0	0
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	4	5	20%
Non-Hispanic	467	498	6.22%
Disability	46	42	(9.52)%

Carver Village AL049002 1109 Jacksonville Ct., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	32	54	40.74%
Black	283	268	(5.60)%
American Indian	0	1	100%
Asian	0	0	0
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	1	1	0
Non-Hispanic	314	322	2.48%
Disability	30	50	40%

Emma Sansom Homes AL049003 2200 White Ave., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	129	178	27.53%
Black	265	301	11.96%
American Indian	5	2	(150)%
Asian	0	0	0
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	0	1	100.00%
Non-Hispanic	399	480	16.88%
Disability	47	81	41.98%

Gateway Village AL049004 1319 Walnut St., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	83	51	(62.75)%
Black	124	92	(34.78)%
American Indian	0	0	0
Asian	0	0	0
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	3	0	(300.00)%
Non-Hispanic	204	143	(42.66)%
Disability	17	25	32%

Campbell Court AL049005 502 Campbell Ct., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	122	138	11.59%
Black	27	67	59.70%
American Indian	0	0	0
Asian	3	2	(50%)
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	1	2	50%
Non-Hispanic	151	205	26.34%
Disability	52	89	41.57%

Starnes Park AL049006 601 Starnes Park, Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/30/2010	Percent Change
Racial			
White	39	40	2.50%
Black	112	111	(0.9)%
American Indian	0	0	0
Asian	0	1	100.00%
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	1	4	75%
Non-Hispanic	150	148	(1.35)%
Disability	49	72	31.94%

Northside Homes AL049008 501 Tuscaloosa Ave., Gadsden, AL	Baseline (Initial) Mix @ 6/30/2004	Current Mix @ 12/31/2009	Percent Change
Racial			
White	1	16	93.75%
Black	78	54	(44.44)%
American Indian	0	0	0
Asian	0	0	0
Native Hawaiian	0	0	0
Ethnicity			
Hispanic	0	0	0
Non-Hispanic	79	70	(12.86)%
Disability	13	9	(44.44)%