

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
--	---	--

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

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

Definitions.

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

A.	PHA Information.																																				
A.1	<p>PHA Name: <u>JEFFERSON COUNTY HOUSING AUTHORITY</u> PHA Code: <u>AL-086</u></p> <p>PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA - High Performer status under PHAs; Troubled status under SEMAP</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2018</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>573</u> Number of Housing Choice Vouchers (HCVs) <u>2291</u> (includes <u>2,181</u> Tenant-Based, <u>60</u> units VASH, and <u>50</u> Mainstream) Total Combined Units/Vouchers <u>2,864</u></p> <p>JCHA also administers 452 Shelter Plus Care vouchers</p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Annual Plan is available at the Jefferson County Housing Authority's administrative office, located at 3700 Industrial Parkway, Birmingham, AL</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" data-bbox="180 1539 1469 1885"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																																	
				PH	HCV																																
Lead PHA:																																					

B.	Annual Plan Elements
B.1	<p>Revision of PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <ul style="list-style-type: none"> • Housing needs in the jurisdiction of PHA as based on the most recent Census Data and SOCDS CHAS Data have not changed. However data concerning housing needs on the waiting lists changes on a frequent basis. Waiting list tables have been prepared and include an analysis by total number, income, disability, race, ethnicity, etc. <p>Waiting lists and JCHA's strategy for addressing housing needs are included as <u>Exhibit 1</u> on <u>pages 7 and 8</u></p> <ul style="list-style-type: none"> • The Analysis of Impediments to Fair Housing is detailed in <u>Exhibit 2</u> on <u>pages 9 and 10</u> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p>Deconcentration</p> <p>This year's Deconcentration Analysis was conducted in August 2017. The results are described in <u>Attachment A</u>.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <ul style="list-style-type: none"> • Continuously changing. The financial resources table is included as <u>Exhibit 3</u> on <u>page 11</u> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <ul style="list-style-type: none"> • JCHA is adopting new versions of the Admissions & Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan. These policies are in compliance with all current HUD regulations. <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <ul style="list-style-type: none"> • <u>Section 8 Homeownership Program</u> – JCHA is administering the Section 8 Homeownership Program. There are currently 80 participants in the Program. To date 24 families have become homeowners. • <u>Public Housing Homeownership Program</u> – JCHA is administering the Public Housing Homeownership Program. There is currently 1 participant in the Program. To date 2 families have become homeowners. <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <ul style="list-style-type: none"> • JCHA is in compliance with PIH Notice 2015-12, Administering the Community Service and Self-Sufficiency Requirement (CSSR), published August 13, 2015. • There are currently 96 participants in the Section 8 FSS, and 31 participants in the Public Housing FSS <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <ul style="list-style-type: none"> • JCHA is in compliance with the most recent Violence Against Women Act (VAWA) notices. The VAWA statement is provided in <u>Attachment B</u>. • JCHA may allow a police officer who would not otherwise be eligible for occupancy in public housing to reside in one of the public housing developments. Such occupancy would be implemented to increase security for public housing residents. The officers will pay only the established PHA minimum rent as an incentive for living in a public housing development. Officers will not be charged a security deposit, but will have to pay other charges, such as late charges, work order charges, court costs, excess utilities, etc. in addition to rent. <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy</p>

Asset Management.

Substantial Deviation.

Substantial deviations from the 5-year Plan occur when the Board of Commissioners decides that it wants to change the mission statement, goals or objectives of the 5-year plan.

Significant Amendment/Modification

Significant amendments or modifications to the Annual Plan are defined as discretionary changes in the plans or policies of the housing authority that fundamentally change the plans of the agency and which require formal approval of the Board of Commissioners.

Proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed finance proposals are considered to be significant amendments to the CFP Five Year Action Plan

(The last statement above has been added as a result of the CFP Final Rule)

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

For ease of reference JCHA's changes have been described within each Annual Plan Element in letter B.1 (a) above.

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

The following is JCHA's Deconcentration Policy as excerpted from the ACOP:

XIX. Deconcentration Rule

A. Objective:

The objective of the Deconcentration Rule for public housing units is to ensure that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development. The specific objective of the HA is to house no less than 40 percent of its public housing inventory with families that have income at or below 30% of the area median income by public housing development. Also 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. The HA will track the status of family income, by development, on a monthly basis by utilizing income reports generated by the HA's computer system.

B. Exemptions:

The following are exempt from this rule.

- Public housing development with fewer than 100 public housing units. A covered development is defined as any single development or contiguous developments that total over 100 units.
- Public housing developments, which house only elderly persons or persons with disabilities, or both.
- Public housing developments, which consist of only one general occupancy family public housing development.
- Public housing developments approved for demolition or conversion to resident based assistance.
- Mixed financing developments.

C. Actions:

To accomplish the deconcentration goals, the HA will take the following actions:

1. At the beginning of each HA fiscal year, the HA 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 HA fiscal year.
2. To accomplish the goals of deconcentration:
 - a. Not less than 40% of the HA admissions on an annual basis shall be to families that have incomes at or below extremely low-income limit and
 - b. 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 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 an extremely low-income family.

B.2 New Activities.

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

Y N

Hope VI or Choice Neighborhoods.

Mixed Finance Modernization or Development

- **JCHA may become involved with Mixed-Finance Modernization or Development, or some other combination of finances to develop and/or redevelop additional housing resources.**

Demolition and/or Disposition

- **JCHA has HUD approval for the Disposition of the Scattered Site units. One unit has been torn down. JCHA has approval to dispose the remaining 13 units thru sealed bids. Bids were received in September 2017. Disposition will be complete by the end of Fiscal 2017. Proceeds will be used to build additional affordable housing units**
- **In fiscal year 2018 JCHA will be applying for the Demolition of 60 units at the Fultondale site in AMP 1. The plan is to demolish the 60 units and build back 60 replacement units, 20 or more additional housing units as well as possible retail stores. Construction will be planned for the existing Fultondale site and possibly other sites in JCHA's jurisdiction. The finance plan will be a combination of Mixed Finance, Replacement Housing funds, and other financing mechanisms. All will be detailed in the Demolition application.**

Designated Housing for Elderly and/or Disabled Families.

- **Following the demolition and rebuilding of the Fultondale unit as noted above, JCHA may consider applying for partial or full designation as elderly-only units. Demographics of JCHA and the local jurisdiction will be used in making this determination.**

Conversion of Public Housing to Tenant-Based Assistance –**No current plans for conversion of public housing.**

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

- **JCHA will research the feasibility of unit conversions under the Rental Assistance Demonstration (RAD) program. If determined feasible, PHA may consider applying for the RAD program during the fiscal year beginning 1/1/2018.**

Occupancy by Over-Income Families. – **Not Applicable to JCHA**

Occupancy by Police Officers.

- **JCHA may allow a police officer who would not otherwise be eligible for occupancy in public housing to reside in one of the public housing developments. Such occupancy would be implemented to increase security for public housing residents. The officers will pay only the established PHA minimum rent as an incentive for living in a public housing development. Officers will not be charged a security deposit, but will have to pay other charges, such as late charges, work order charges, court costs, excess utilities, etc. in addition to rent.**

Non-Smoking Policies.

- **On December 5, 2016, HUD published a final rule in the Federal Register for each Public Housing Agency administering low-income, conventional public housing to initiate a HUD-mandated smoke-free policy. The effective date of the Rule is February 3, 2017, and it provides an 18-month implementation period. The Final Rule was followed up with PIH Notice 2017-3, SUBJECT: HUD Guidance on Instituting and Enforcing Smoke-Free Public Housing Policies, issued February 15, 2017.**

JCHA will be working on a Non-Smoking Policy to comply with this mandate, and will be fully compliant by July 2018. Resident consultation will be part of the process prior to Board approval and JCHA implementation.

Project-Based Vouchers.

- **JCHA has 74 Project-Based units. It is the intent of JCHA to utilize up to 20% of the funding available for its current Section 8 Housing Choice Voucher program allocation for a Project-Based Voucher Program. JCHA is considering entering into additional Project-Based Section 8 Voucher partnerships in the coming year, most specifically the VASH vouchers**

PHAs are allowed to project-base an additional 10% to serve certain populations, as permitted in the January 18, 2017 issue of the *Federal Register*. The Housing Authority will be considering both new construction and existing developments. Further information is in Attachment C.

	<p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <ul style="list-style-type: none"> • JCHA currently has two units off-line. JCHA will continue to use this authority if and when needed. <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <ul style="list-style-type: none"> • If circumstances warrant, JCHA may apply for the above-referenced grants. <p><u>Other Programs or Activities –</u></p> <p>JCHA may apply for Housing Choice Vouchers if NOFAs are posted and it is determined that additional vouchers could be utilized</p> <p>JCHA may apply for new programs (FSS, ROSS, etc) or other sources of funding if NOFAs are issued by HUD or other appropriate opportunities are presented.</p> <p>JCHA will be exploring alternative funding sources for renovations of the public housing inventory, e.g. LIHTC, and other public and/or private funding sources.</p> <p>JCHA may purchase properties in Jefferson County where deemed feasible. If feasible, these would be purchased for housing development.</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <ul style="list-style-type: none"> • For ease of reference JCHA's changes have been described <u>within</u> each category of New Activities in letter B.2 (a) above.
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><u>See Attachment D</u></p>
B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <ul style="list-style-type: none"> • One Section 8 participant's unit was not re-inspected within the 30-day window after the failed inspection, no extension was noted. • Two Section 8 participants' units were not inspected on an annual basis. <p>JCHA has terminated the contract with the 3rd party company that was providing inspection services. In addition, the Authority has implemented additional controls to ensure that all inspections are done timely.</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>Due to detail in the 5-Year Goals and Objectives for Fiscal Years 1/1/2015 – 1/1/2019, the progress report is set forth on <u>"Exhibit 4" on pages 12 through 15.</u></p>

<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><u>See Attachment E</u></p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p><u>See Attachment F</u></p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD on 04/13/2016.</p> <p>Capital Fund documents were formerly part of the Five-Year & Annual Plan files. The Public Housing CFP Final Rule was published in the <i>Federal Register</i> October 24, 2013 and was effective on November 25, 2013. This CFP Final Rule decoupled the CFP from the PHA Annual Agency Plan. CFP documents are to be prepared during the 45-day review period, reviewed with the RAB, presented at the Public Hearing and approved by the Board of Commissioners. However they are to be submitted to HUD separately from the Agency Plan process, when “requested by HUD”.</p> <p>JCHA has followed all of these actions.</p>

Per the chart on page 4 of [PIH Notice 2015-18, Subject: Availability of New and Revised Public Housing Agency \(PHA\) Five-Year and Annual Plan Templates and Other Forms](#), PHAs are to annually submit a statement of “Challenged Elements”.

The Challenged Elements statement is included as [Attachment G](#).

EXHIBIT 1

Statement of Housing Needs and Strategy for Addressing Housing Needs
(From section B.1 of PHA Plan Template, page 2)

A. Housing Needs in the Jurisdiction of Jefferson County Housing Authority:

Type Family	Income Range			Totals
	0% to 30% of median	31% to 50% of median	51% to 80% of median	
Elderly	789	732	550	2,071
Small Families	2,343	1,998	1,719	6,060
Large Families	298	389	174	861
All Other Households	1,618	1,377	997	3,992
Totals	5,048	4,496	3,440	12,984

(Source – Consolidated Plan of Jefferson County 2010-2015)

Racial and Ethnicity demographics according to the 2010 United States Census Bureau:

- 53.0% White
- 42.0% Black
- 0.3% Native American
- 1.4% Asian
- 0.0% Native American
- 1.1% Two or more races
- 3.9% Hispanic or Latino of any race

According to the most recent SOCDS CHAS Data available on the HUD-User web site, 32.5% of Renter and Owner Households in Jefferson County, AL were identified as households with Mobility & Self Care Limitation.**

Of these, 67.6 % of households at <=30% MFI were identified as having a housing problem. The SOCDS CHAS Data set does not identify what the housing problems are. But it is assumed that cost burden and insufficient accessible housing resources may possibly be two of the main issues.

46.6 % of households with household incomes at >30 to <=50% MFI were identified as having a housing problem. Again, the SOCDS CHAS Data set does not identify what the housing problems are. But it is assumed that cost burden and insufficient accessible housing resources may possibly be two of the main issues.

(**Source – State of the Cities Data Systems – Comprehensive Housing Affordability Strategy Data)

The Analysis of Impediments to Fair Housing is detailed in Exhibit 2 on pages 9 and 10.

B. Housing Needs as evidenced on the waiting lists of the Jefferson County Housing Authority:

HOUSING NEEDS OF FAMILIES ON THE WAITING LIST (<u>PUBLIC HOUSING</u>)					
JEFFERSON COUNTY HOUSING AUTHORITY					
Category	AMP One Fultondale	AMP Two Warrior	AMP Three Bessemer	TOTAL	%
Waiting List Total	726	419	154	1299	
Extremely low income <=30% AMI	272	323	122	717	55.20%
Very low income (>30% but <=50% AMI)	55	78	29	162	12.47%
Low income (>50% but <80% AMI)	17	18	3	38	2.93%
High	0				
Families with children	329	149	137	615	47.34%
Elderly families	6	39	1	46	3.54%
Families with Disabilities	47	130	16	193	14.86%
Race/Ethnicity – White	14	198	2	214	16.47%
Race/Ethnicity – Black	362	219	152	733	56.43%

HOUSING NEEDS OF FAMILIES ON THE WAITING LIST (<i>PUBLIC HOUSING</i>) JEFFERSON COUNTY HOUSING AUTHORITY					
Race/Ethnicity – Native American	0	0			
Race/Ethnicity – Other	0	1			
Race/Ethnicity – Hispanic	0	1			
Characteristics by Bedroom Size					
0 BR	N/A	22			
1BR	119	250	21	390	30.02%
2 BR	132	29	43	204	15.70%
3 BR	101	80	90	271	20.86%
4 BR	24	38			
5 BR		0			

- AMP 1 Waiting List is currently closed.
- AMP 2 Waiting List is currently open. It is anticipated the Waiting List will be closed in the upcoming fiscal year.
- AMP 3 Waiting List is currently closed. It is anticipated the Waiting List will be open in the upcoming fiscal year.
- Annual analysis for site demographics has been completed. The annual analysis reflects that implementation of the site-based waiting lists has not caused an adverse change in the racial, ethnic, or disability-related tenant composition.

HOUSING NEEDS OF FAMILIES ON THE WAITING LIST (<i>SECTION 8</i>) JEFFERSON COUNTY HOUSING AUTHORITY					
Category	Section 8	Mainstream	Fairfield	TOTAL	%
Waiting List Total	255	98	372	752	
Extremely low income <=30% AMI	204	85	372	684	91%
Very low income (>30% but <=50% AMI)	47	22	0	144	19%
Low income (>50% but <80% AMI)	3	0	0	4	<1%
Families with children	182	41	291	530	71%
Elderly families	19	19	22	66	9%
Families with Disabilities	65	57	59	183	25%
Race					
Race/Ethnicity – White	6	23	10	40	5%
Race/Ethnicity – Black	248	83	362	729	97%
Race/Ethnicity – Native American	0	0	0	0	0%
Race/Ethnicity – Other	1	2	0	3	<1%
Race/Ethnicity – Hispanic	0	0	0	0	0%

- The Section 8 Waiting List is currently closed and has been for 3 years. It is anticipated the Waiting List will not be opened in the upcoming fiscal year.

Strategy for Addressing Housing Needs:

To address the housing needs of families living within our jurisdiction and those on the waiting lists, some of the strategies Jefferson County Housing Authority will strive for include the following:

- Continue to affirmatively market our public housing units and the Section 8 program to elderly families, disabled families and all other families
- Continue to affirmatively market our public housing units and the Section 8 program to all race and ethnic groups residing within our jurisdiction and the surrounding area
- Continue to make reasonable on-demand accessible modifications as a reasonable accommodation to disabled families in our public housing units
- Apply for Housing Choice Vouchers if NOFAs are posted and it is determined that additional vouchers could be utilized
- Investigate ways to seek alternative funding sources through non-HUD grants opportunities.
- Continue to maintain the apartment buildings and grounds and keep them in excellent condition
- Continue to maintain low vacancy rate and turnaround time so that affordable housing remains readily available

Funding and staffing constraints will impact some of the above strategies.

Exhibit 2
Jefferson County Housing Authority
Analysis of Impediments to Fair Housing
Jefferson County, AL

The 2010 (updated 2011) document entitled *Jefferson County, Alabama Analysis of Impediments to Fair Housing*, obtained from the Jefferson County Office of Economic Development, identifies the following fifteen primary impediments to fair housing in the Jefferson County, Alabama jurisdiction. JCHA's response to mitigating those impediments follows.

1. The encouragement by the Federal government of irresponsible mortgage financing in the primary and secondary markets resulting from the emphasis on increasing home-ownership percentages through the use of adjustable interest rates, interest only loans, balloon financing and the allowance of above average closing/fee costs leading to the disenfranchisement of millions of lower income Americans.

JCHA response: JCHA has been a HUD-certified housing counseling agency since 1994 and employs one full-time housing counselor to assist with group and individual counseling sessions in a myriad of housing-related topics. These topics include pre-homeownership instruction and counseling that explains the mortgage process, the various types of mortgages available and post-purchase maintenance on the mortgage and home. Outreach is conducted through public service announcements, word of mouth, marketing to lenders, realtors, and other housing providers. Funding for the housing counseling program is provided through grant initiatives such as HUD, banks, and the Community Development Block Grant funding through Jefferson County and, most recently, City of Birmingham.

2. The use of reverse mortgages to encourage the elderly to accept financing at above average interest rates while relinquishing equity. This is a ticking bomb in which we have not yet felt the full effect.

JCHA response: Until 2011, when HUD rules on reverse mortgage (HECM) counseling certifications changed, JCHA's comprehensive housing counselor was certified to provide HECM counseling. If there are clients seeking HECM counseling at the present time, those calls are referred to either Neighborhood Counseling Services or Consumer Credit Counseling agency. The current housing counselor plans to seek HECM certification in 2014.

3. The use of above-market value financing to impoverish low-income homeowners by decreasing their ability to repay the debt and making their homes virtually unsellable due to the size of the debt combined with declining market values.

JCHA response: JCHA's housing counseling program provides housing counseling services in the area of mortgage default counseling both in group and individualized settings. Its counselor works with the client and the mortgage company to hopefully mitigate their situation into one that will allow them to keep their home and avoid foreclosure. Other options are also explored such as deed in lieu, pre-foreclosure sale, etc.

4. Citizens' lack of financial resources to compete in the housing market.

JCHA response: JCHA responds to this impediment in two ways:

First, our housing counselor provides free budget and credit counseling to any resident of Jefferson County, particularly those that are considered low-income. An analysis of the clients' budgets leads to counseling to assist in better budgeting steps and in repairing credit scores. If client considers him/herself to be undereducated or underemployed, referrals are made to area agencies to assist with education and training opportunities.

Second, residents and tenants of JCHA can voluntarily choose to participate in a Family Self-Sufficiency program to become self-sufficient within five years. Counseling and linkages to area agencies will hopefully enable earned income to increase and allow for the resident/tenant to qualify for an affordable mortgage. We currently have approximately 150 families enrolled in this program.

5. Citizens' lack of education concerning their rights under the Fair Housing Act.

JCHA response: JCHA strives to meet all requirements of the Fair Housing Act through disclosure, use of fair housing logo on all materials and advertisements, etc. In addition, all tenants and other clients are instructed on how to file a fair housing complaint during the course of interviews and/or educational presentations. All complaints, if directed toward the Housing Authority, are promptly investigated and remedied as soon as possible.

6. Citizens' lack of training and understanding in the mechanics, procedures and requirements of the current generation of financial institutions, sellers and landlords.

7. Citizens' lack of knowledge in such areas as financial management and credit stability.

JCHA response to impediments **six and seven**: As a certified HUD housing counseling agency, comprehensive counseling in a myriad of topics is provided to residents of Jefferson County through either educational/group settings or individualized counseling sessions. These services are

free. The pre-homeownership counseling explains the mortgage process and the education sessions generally include representatives from financial institutions that explain their various products in detail. Financial management and credit stability are key to those considering the purchase of a home and are considered standard counseling topics and remedying during the course of the counseling sessions.

8. The virtual impossibility of the private sector to provide either non-subsidized rental or ownership opportunities to those within the 80% of median income range.

JCHA response: JCHA's housing counselors and FSS Case Manager market their program to members of the banking, realtor, and mortgage agencies' arena on a consistent basis to recruit their participation in lending and purchasing opportunities for low-income families. Lenders are needed to allow Section 8 homeownership participants the opportunity to purchase a home with the use of their Section 8 voucher.

9. Lack of infra-structure, particularly sanitary sewer, in large areas of the county, thus precluding both affordable and non-affordable new construction.

JCHA response: JCHA planning department works diligently with county officials during all phases of their new construction projects to meet requirements.

10. Sanitary sewer and water impact and monthly charges which are increasing at a frightening rate and decrease the available income that lower-income households have for either mortgage or rent payments.

JCHA response: JCHA works diligently to repair all sewer or water leaks on their properties within a 24-hour period if at all possible. They perform routine maintenance as needed to prevent damages. JCHA Section 8 and public housing property managers complete utility surveys as required to assure their utility allowances for low-income residents/tenants are up-to-date and meet HUD requirements.

11. Lack of public transit outside of very limited urbanized areas thus decreasing the options that transit-dependent, lower-income households have.

JCHA response: Lack of transportation is one of the top barriers to self-sufficiency that our public housing residents face on a daily basis. We are working within our Program Coordinating Committee (for self-sufficiency participants) to advocate for available/affordable transportation in the rural areas. This would include making our public housing locations a stop on the MAX bus lines.

12. Lack of accessible housing, both owner and rental, for those with disabilities.

JCHA response: JCHA maintains a waiting list for those individuals that are considered to be disabled and meet income limitations for public housing and Section 8. In addition, JCHA provides rental housing through its Spring Gardens community which is a 266 (soon to be 286) unit block of senior and disabled housing in the Tarrant area. As funding permits, new units of affordable housing are built as often as possible.

13. Lack of Section 8 vouchers and certificates limits the housing options available to lower-income households.

JCHA response: Each and every time HUD issues a funding opportunity for Section 8 vouchers of any kind, JCHA makes application. The most recent award was for 50 Veterans Assistance vouchers. JCHA also administers the Section 8, Mainstream and Family Unification vouchers AND a 500 voucher program for Shelter Plus Care program participants. This program provides housing assistance for those persons in recovery from substance or alcohol abuse.

14. Inadequate housing for the low, very low and extremely low-income elderly.

JCHA response: JCHA provides housing units for the low, very low and extremely low-income elderly population of Jefferson County. Income eligibility is set by HUD and JCHA verifies income upon application for public housing and Section 8. Lease up is maintained at a 95% or better. Waiting lists are maintained according to income, elderly status and number of bedrooms needed.

15. The presence of lead-based paint in much of the existing housing stock which is otherwise affordable.

JCHA response: Lead abatement has occurred in all JCHA-owned properties over the years. The comprehensive housing counseling staff assure that all prospective homeowners that receive counseling services are apprised of the lead paint issue prior to purchase and to include lead paint inspection in all homes that are being considered for purchase.

16. Discrimination in one hateful form or another.

JCHA response: JCHA is committed to non-discrimination practices in all forms of hiring, housing, and compliance. All forms utilized in housing counseling and other programming by the housing authority includes anti-discriminatory statements, how to file a fair housing complaint, etc. Discrimination is not tolerated under any circumstances.

EXHIBIT 3
Financial Resources
(From section B.1 of PHA Plan Template, page 2)

Sources of Funds		Planned Dollar Amount	Planned Use
1	Federal Grants (FY 2018 Funds)		
	a. Public Housing Operating Fund	2,501,330	
	b. Public Housing Capital Fund	783,036	
	c. Supportive Housing for persons with Disabilities	333,428	Housing Assistance
	d. Annual Contributions for Section 8 TenantBased Assistance	16,845,107	Housing Assistance
	e. Housing Counseling Assistance Program (HUD)	15,476	Housing Assistance
	Other Federal Grants (List Below)		
	* Continuum of Care	3,866,913	Housing Assistance
	* Family Self Sufficiency Program (PH & HCVP)	135,000	Housing Assistance
2	Prior Year Federal Grants (unobligated funds only)(list below)		
	* FY 2012 CFRP	19,269	
	* FY 2013 CFRP	21,853	
	* FY 2014 CFP	95,819	
	* FY 2014 CFRP	26,454	
	* FY 2015 CFP	280,625	
	* FY 2015 CFRP	23,108	
	* FY 2016 CFRP	26,054	
	* FY 2016 CFP	671,991	
	* FY 2017 CFP	783,036	
3	Public Housing Dwelling Rental Income	696,905	Maintain public housing properties, administer public housing program
4	Other income (list below)		
	* Fraud Recovery / Interest Income	15,478	Administer public housing programs
	* PH Tenant Charges: Late, Maintenance, Garbage, Pet, Legal	124,667	Administer public housing programs
	* Management Fees / Bookeeping Fees / Asset Management Fees	966,795	Administer public housing programs
	* Outside Management Fee	172,798	Administer public housing programs
5	Nonfederal sources (list below)		
	* Housing Affordability Trust	1,484,131	Various Housing Related Projects
	Total resources	29,889,273	

Exhibit 4
Jefferson County Housing Authority

Progress on Goals & Objectives

PROGRESS ON GOALS & OBJECTIVES ESTABLISHED FOR FISCAL YEARS 2015 – 2019:

HUD Strategic Goal 1: Strengthen the Nation’s Housing Market to bolster the economy and protect consumers	
JCHA Goals & Objectives	Progress
Goal 1A: Mitigate foreclosure crisis for families in need: <ul style="list-style-type: none"> • Maintain HUD-certified housing counseling status • Provide mortgage default counseling and education* • Provide financial literacy and budgeting counseling and education* <p>* Based on HUD’s Office of Housing Counseling guidelines</p>	<ul style="list-style-type: none"> • Maintained • In Progress • In Progress
Goal 1B: Educate and protect consumers when they buy, finance, or rent a home: <ul style="list-style-type: none"> • Educate renters and tenants regarding lease requirements before, during and following the application/move-in phases • Educate or counsel homebuyers regarding the mortgage and finance process during all phases of their progression to homeownership • Routinely review all plans and procedures to assure compliance with HUD-assisted housing guidelines and homeownership opportunities 	<ul style="list-style-type: none"> • Done at orientation lease-up • In Progress • In Progress
Goal 1C: Initiate homeownership opportunities: <ul style="list-style-type: none"> • Aggressively market Family Self-Sufficiency at all levels of the organization • Host pre-homeownership seminars on a consistent basis for tenants, residents and the community at large 	<ul style="list-style-type: none"> • Continuing • In Progress
Goal 1D: Maintain an accountable and sustainable housing finance system: <ul style="list-style-type: none"> • Train/cross train employees regarding accounting policies and procedures • Provide consistent support services to all customers • Provide statistical information management reports to all customers as needed and requested • Support all grant and revenue seeking opportunities with needed input and documentation 	<ul style="list-style-type: none"> • In Process • In Process • In Process • In Process

HUD Strategic Goal 2: Meet the need for quality, affordable rental homes	
JCHA Goals & Objectives	Progress
Goal 2A: Reduce the number of families and individuals with severe housing needs, including homelessness: <ul style="list-style-type: none"> • Apply for additional rental vouchers as they become available • Network with all appropriate housing-related agencies to collaborate on reducing homelessness among Jefferson County citizens • Assure compliance with all aspects of Shelter Plus Care program 	<ul style="list-style-type: none"> • No new vouchers added to inventory • Networking In Process • Doing; no issues
Goal 2B: Expand the supply of assisted housing: <ul style="list-style-type: none"> • Reduce the number of public housing vacancies • Leverage private or other funds to create additional housing opportunities 	<ul style="list-style-type: none"> • Working toward this • Looking at opportunities
Goal 2C: Improve the quality of assisted housing: <ul style="list-style-type: none"> • Improve or maintain public housing PHAS score (Goal: High Performer) • Improve voucher management SEMAP score • Increase customer satisfaction as indicated by fewer grievance complaints, requests for hearings, etc. • Renovate or modernize public housing units as funding allows • Explore the feasibility and implications of RAD conversion • Adhere to the Deconcentration policy guidelines 	<ul style="list-style-type: none"> • Current High Performer • Current Troubled Performer • A couple of hearings • Done through Capital Funds • Looking • Follow HUD guidelines

<p>Goal 2D: Expand assisted housing choices:</p> <ul style="list-style-type: none"> • Provide voucher mobility counseling through the Family Self-Sufficiency program and other available avenues • Conduct outreach to potential landlords county-wide • Monitor voucher payment standards for any necessary changes • Maintain and enhance voucher homeownership program • Explore feasibility of Public Housing Homeownership program • Continue public housing site-based waiting list and actively seek additional methods to streamline the admissions process 	<ul style="list-style-type: none"> • Providing • Planning next landlord appreciation • Continue • Currently have 80 S-8 Homeownership participants • Currently have 1 PH Homeownership participant • Follow policy
---	--

HUD Strategic Goal 3: Utilize housing as a platform for improving quality of life	
JCHA Goals & Objectives	Progress
<p>Goal 3A: Actively seek opportunities to improve educational outcomes for all residents and early learning and development for younger residents:</p> <ul style="list-style-type: none"> • Seek additional grant opportunities for educational and learning programs • Build successful collaborations with area agencies focusing on educational and learning opportunities for all residents • Include age appropriate educational information in JCHA newsletter each quarter 	<ul style="list-style-type: none"> • Talking to Junior Colleges • Talking to Junior Colleges • Continue
<p>Goal 3B: Seek to improve health outcomes for residents, particularly for the well and frail elderly 60 years of age and older, and disabled populations who continue to live independently in their homes:</p> <ul style="list-style-type: none"> • Provide educational information on health-related topics at least quarterly • Actively network with any/all staff to identify unmet needs of the elderly/disabled resident population and make appropriate referrals in-house and beyond to meet needs 	<ul style="list-style-type: none"> • Done through AMP newsletter • Managers and Assistant Managers monitor
<p>Goal 3C: Promote economic security and self-sufficiency among all residents:</p> <ul style="list-style-type: none"> • Increase the number and percentage of employed persons in assisted families • Provide or attract supportive services to improve assisted families' employability • Actively market the Family Self-Sufficiency program at all levels of the organization • Provide or attract supportive services to increase independence or improve quality of life for the elderly or disabled 	<ul style="list-style-type: none"> • Following policy as funding allows • Following policy as funding allows • Following policy as funding allows • Following policy as funding allows
<p>Goal 3D: Improve housing stability through supportive services for vulnerable populations, including elderly, disabled and those at risk of becoming homeless:</p> <ul style="list-style-type: none"> • Continue to actively seek in-kind services for vulnerable populations • Ensure all programs and services are consistent, adequate and reach all housing communities and tenants • Involve residents and staff in the development, implementation, delivery and evaluation of programs and services • Continue to actively seek additional revenue for services and programs 	<ul style="list-style-type: none"> • Working with local agencies to provide these services • Services are available to all populations where needed and as funding allows • Resident Advisory /council • Apply for grants as appropriate NOFAs and other viable opportunities are presented
<p>Goal 3E: Maintain or improve public safety:</p> <ul style="list-style-type: none"> • Continue to look for ways to improve security in public housing • Continue to seek funding for security enhancements in public housing • Strengthen or build relationships with public safety officials for baseline law enforcement services 	<ul style="list-style-type: none"> • Done through Capital Fund • Done through Capital Fund • Done through Capital Fund

HUD Strategic Goal 4: Build inclusive and sustainable communities free from discrimination	
JCHA Goals & Objectives	Progress
<p>Goal 4A: Pursue economic development and job creation:</p> <ul style="list-style-type: none"> • Continue to build and strengthen the partnership with Office of Economic Development • Continue to pursue new construction opportunities through the use of county funding such as HOME and CDBG • Continue to meet the requirements of Section 3 program • Continue to pursue non-traditional revenue generators • Continue to build and strengthen a partnership with the Workforce Investment program regarding employment opportunities for residents and tenants 	<ul style="list-style-type: none"> • Work with County • Working with County • Follow policy • Looking at several areas • Continuing
<p>Goal 4B: Provide housing communities that are healthy, diverse, affordable and energy efficient:</p> <ul style="list-style-type: none"> • Maintain and routinely evaluate rent reasonableness standards • Meet all requirements of flat rent policy • Actively seek and implement energy-efficient measures in all aspects of building maintenance and modernization • Consistently orient and educate residents in energy-efficiency and cost saving measures 	<ul style="list-style-type: none"> • Annually through the software program “Go Section 8” • Follow policy • When updating and modernization occurs • Flyers and information sent by Managers
<p>Goal 4C: Provide for open, diverse and equitable communities:</p> <ul style="list-style-type: none"> • Undertake affirmative measures to ensure access to and provide a suitable living environment for families living in assisted housing regardless of race, color, religion, natural origin, sex, familial status and disability • Undertake affirmative measures to ensure accessible housing to persons with disabilities • Work to resolve all reasonable accommodations requests and fair housing complaints quickly and efficiently • Continue to educate staff at all levels in fair housing practices and provisions 	<ul style="list-style-type: none"> • Following policy • As needed • Follow policy • Training as needed
<p>Goal 4D: Enhance disaster preparedness, response, and recovery measures in public housing:</p> <ul style="list-style-type: none"> • Routinely review and update disaster plan for clarity, understanding and efficiency • Pursue partnerships with area disaster response agencies such as American Red Cross to provide for needed services during disaster situations • Consistently provide educational information to residents concerning disaster preparedness measures • Ensure appropriate casework services are initiated for public housing victims of disaster 	<ul style="list-style-type: none"> • In progress • Pursuing • Done through AMP newsletters • Following policy
<p>Goal 4E: Assist in capacity building of local and state public and private organizations:</p> <ul style="list-style-type: none"> • Encourage and allow staff to serve on area boards and committees as requested and appropriate • Partner with area agencies on grant-related opportunities and activities 	<ul style="list-style-type: none"> • Doing • Work with several agencies

HUD Strategic Goal 5: Transform the way HUD does business	
JCHA Goals & Objectives	Progress
<p>Goal 5A: Establish and maintain a performance and team-oriented work environment:</p> <ul style="list-style-type: none"> • Train and cross train employees • Develop and implement succession plan as staff relocate, resign or retire • Encourage and implement measures that ensure staff interaction, idea sharing, and innovative thinking and action • Assure performance management system is equitably administered through routine training and oversight as needed 	<ul style="list-style-type: none"> • Continue • Continue • Staff meetings • Continue
<p>Goal 5B: Focus on results:</p> <ul style="list-style-type: none"> • Ensure that job descriptions accurately measure relevant results and outcomes • Strive to celebrate accomplishments and learn from shortfalls 	<ul style="list-style-type: none"> • Updating when needed • Continue
<p>Goal 5C: Promote agency responsiveness, openness and transparency:</p> <ul style="list-style-type: none"> • Assure compliance with all HUD directives regarding reporting and data requirements • Seek avenues to publicize JCHA opportunities, accomplishments and successes 	<ul style="list-style-type: none"> • Follow policy and directives • Developed Facebook page
<p>Goal 5D: Maintain a work environment that reflects JCHA's mission and values:</p> <ul style="list-style-type: none"> • Meet or exceed HUD's requirements in all departments • Reward exemplary customer service in manners most meaningful to staff members • Resolve customer complaints quickly and effectively within HUD guidelines as relevant 	<ul style="list-style-type: none"> • Continue • Continue • Continue