Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 9/30/2027

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. They also inform 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-, very low-, and extremely low- income families.

Applicability. The 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. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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 HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	**PHA Name**: MOLINE HOUSING AUTHORITY **PHA Code**: il020 **PHA Type:** ☑ Standard PHA ☐ Troubled PHA **PHA Plan for Fiscal Year Beginning**: (MM/YYYY): 04/2026 **PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) **Number of Public Housing (PH) Units** 486 **Number of Housing Choice Vouchers (HCVs)** 246 **Total Combined Units/Vouchers** 732 **PHA Plan Submission Type:** ☑ Annual Submission ☐ Revised Annual Submission **Public Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. 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 and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. The Moline Housing Authority Annual & 5-Year PHA Plan is available for public review and comment at the Housing Authority ' s central office cost center / located in AMP 1 (main office) located at 4141 11th Avenue A, Moline, IL during hours of operation on Monday – Friday 8:00 AM – 4:30 PM. The Moline Housing Authority Annual & 5-Year PHA Plan can also be viewed on our website at www.molinehousing.com.

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B.	Plan Elements

B.1 Revision of Existing PHA Plan Elements.

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

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

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

*See Attachment (a) for listing of ACOP & Administration Plan changes
*See Attachment (b) for Financial Resources changes

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

*See Attachment (c) for Deconcentration Policy

B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year? Y N ☐ ☑ Choice Neighborhoods Grants. ☐ ☑ Modernization or Development. ☐ ☑ Demolition and/or Disposition. ☐ ☑ Designated Housing for Elderly and/or Disabled Families. ☐ ☑ Conversion of Public Housing to Tenant-Based Assistance. ☐ ☑ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☑ Homeownership Program under Section 32, 9 or 8(Y) ☐ ☑ Occupancy by Over-Income Families. ☐ ☑ Occupancy by Police Officers. ☐ ☑ Non-Smoking Policies. ☐ ☑ Project-Based Vouchers. ☐ ☑ Units with Approved Vacancies for Modernization. ☐ ☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the applicable 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.

B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. The MHA has met over 20% of its goals that were set in the FY 2025-2030 5-Year Plan and has continued to operate in accordance to the MHA Mission Statement. Some of the goals met include those in the following areas: • Management Issues • Expansion of Meeting the Affordable Housing Stock Issues • Lease and Occupancy • Marketability and Security Issues • Tenant-Based Housing Issues • Maintenance and Capital Fund Issues • Equal Opportunity Issues • Fiscal Responsibility Issues • Public Image • HUD Strategic Goals

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. 5-Year Action Plan for 2024-2028 Approved on 01/17/2025
B.5	**Most Recent Fiscal Year Audit**. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☑ (b) If yes, please describe:
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☑ ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. *See Attachment (d) for Resident Advisory Board (RAB) Comments.

C.2	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. *See Attachment (e) for Form HUD 50077-SL
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations* *Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan. *See Attachment (f) for Form HUD 50077-ST-HCV-HP
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y ☐ N ☑ (b) If yes, include Challenged Elements.

C.5	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☐ ☑ (b) If yes, please describe:

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section (24 CFR 903.4).

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and Number of HCVs, PHA Plan Submission Type**, and the **Public Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(e)).

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table (24 CFR 943.128(a)).

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no" (24 CFR 903.7).

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location (24 CFR 903.7(a)(2)(i)). Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy (24 CFR 903.7(a)(2)(ii)).

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions**. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR 903.23(b)). Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR 903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements (24 CFR 903.7(b)). Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists (24 CFR 903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV (24 CFR 903.7(b)). Describe the unit assignment policies for public housing (24 CFR 903.7(b)).

☐ **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 (24 CFR 903.7(c)).

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies (24 CFR 903.7(d)).

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and 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 (24 CFR 903.7(e)).

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants (24 CFR 903.7(f)).

☐ **Homeownership Programs**. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or HCV homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

☐ **Community Service and Self Sufficiency Programs**. Describe how the PHA will comply with the requirements of (24 CFR 903.7(l)). Provide a description of: (**1**) Any programs relating to services and amenities provided or offered to assisted families; and (**2**) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS (24 CFR 903.7(l)).

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (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 (24 CFR 903.7(m)). Note: All coordination and activities must be consistent with federal civil rights obligations. 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 survivors of domestic violence, dating violence, sexual assault, or stalking; (**2**) Any activities, services, or programs provided or offered by a PHA that helps survivors 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 survivor safety in assisted families (24 CFR 903.7(m)(5)).

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing (24 CFR 903.7(n)).

☐ **Asset Management.** State 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 (24 CFR 903.7(q)).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan (24 CFR 903.7(s)(2)(i)).

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)). For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH 2019-23(HA), successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR 903.23(b)).

B.2 **New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Choice Neighborhoods Grants.** **(1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Choice Neighborhoods Grants; and (**2)** A timetable for the submission of applications or proposals. The application and approval process for Choice Neighborhoods is a separate process. See guidance on HUD's website at: https://www.hud.gov/cn (Notice PIH 2011-47).

☐ **Modernization or Development (Conventional & Mixed-Finance).** **(1)** A description of any Public Housing (including name, project number (if known) and unit count) for which the PHA will apply for modernization or development; and (**2)** A timetable for the submission of applications or proposals. The application and approval process for modernization or development is a separate process. (See 24 CFR part 905 and guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4).

☐ **Demolition and/or Disposition.** With respect to public housing only, (1) describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) a timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/ and 24 CFR 903.7(h).

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted, or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. 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, (**5**) the number of units affected and **(6)** expiration date of the designation of any HUD approved plan. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation (24 CFR 903.7(i)(c)).

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe **(1)** any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **(2)** an analysis of the projects or buildings required to be converted under Section 33; and (**3)** a statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at the Special Applications Center (SAC) (https://www.hud.gov/sac) and 24 CFR 903.7(j).

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program (including Faircloth to RAD).** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. Note that all PHAs shall be required to provide the information listed in Attachment 1D of Notice PIH 2019-23(HA) as a significant amendment or its successor notice. See additional guidance on HUD's website at: https://www.hud.gov/RAD/library/notices.

☐ **Homeownership Programs**. A description of any Section 5h, Section 32, Section 8y, or HCV homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty day notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. (See additional guidance on HUD's website at: Notice PIH-2021-35 (24 CFR 960.503) (24 CFR 903.7(b)).

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2021-35. (24 CFR 960.505) (24 CFR 903.7(b)) NOTE: All activities must be consistent with civil rights laws – including ensuring that it does not have a disparate impact on protected class groups based on race, color, religion, national origin, sex (including sexual orientation), familial status, and disability.

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03 (24 CFR 903.7(e)).

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 24 CFR 983.55(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r)).

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR 990.145(a)(1).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Lead Based Paint, Housing Related Hazards, At Risk/Receivership/Substandard/Troubled Program, and/or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the applicable Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan (24 CFR 903.7(s)(1)).

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR 903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided (24 CFR 903.7(p)).

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR 903.15). **Note:** A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 et. seq., 24 CFR 903.7(o)(1), and 903.15.

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A" (24 CFR 903.9).

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 the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 5.64 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. 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 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.

Attachment A

Administrative Plan (ADMIN 2026)

Chapters of the Administrative Plan for the MHA Section 8 Housing Choice Voucher Program with substantive revisions based on implementation of new Housing and Opportunity Through Modernization Act of 2016 (HOTMA):

Introduction	Revised and Restated - Added explanation of HOTMA changes throughout the policy document, including changes for Sections 102 and 104 and the HOTMA Voucher Final Rule, including explanation of the use of HQS and NSPIRE in the policy document.
Chapter 1	Added information on the HOTMA Voucher Final Rule to the Overview and History of the Program.
	Updated terminology from NSPIRE to "minimum quality standards" per the HOTMA Voucher Final Rule.
	Added policies on increases and decreases in the payment standard to the list of required plan contents.
Chapter 2	Added additional examples to the list of reasonable accommodation types.
Chapter 3	Added policies that will be effective prior to the PHA's HOTMA compliance date.
	Added policies for HOTMA that will become effective upon MHA's compliance date.
	Clarified policy language on live-in aides to better align with fair housing best practices.
	Added families eligible for VASH to the list of eligible applicant families.
	Clarified language regarding the EIV Income Report.
Chapter 5	Clarified fair housing and NSPIRE-related language throughout the chapter to bring the content current with the HOTMA Final Rule.
Chapter 6	Split Chapter 6 into two chapters: 6.A and 6.B.
	Chapter 6.B represents the policies MHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 6. This includes:
	Clarifications and corrections regarding student financial assistance requirements under HOTMA.
	Clarifications regarding the treatment of alimony and child support.
	Clarifications regarding amounts adjusted annually under inflation under HOTMA.
	Updates to the list of federally mandated income exclusions.
	Clarifications regarding necessary and non-necessary personal property.
	Clarifications regarding health and medical care expenses.

	Required changes for the HOTMA Voucher Final Rule, including changes regarding increases and decreases in payment standards. Policies effective prior to and upon specific effective dates are explicitly listed.
	Additions to the section on applying utility allowances regarding flat fees and PBV developments.
Chapter 7	Split Chapter 7 into two chapters: 7.A and 7.B.
	Chapter 7.B represents the policies MHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 7. This includes:
	Changes regarding the use of consent forms, specifically as related to HUD-9886-A.
	Clarifications regarding amounts adjusted annually under inflation under HOTMA.
	Policy revisions for streamlined income determinations from fixed sources of income.
	Certain updates for Notice PIH 2023-27 regarding verification requirements, use of EIV self- certification, verification of net family assets, and treatment of zero-income families.
Chapter 8	Split Chapter 8 into two chapters: 8.A and 8.B.
	Chapter 8.B represents the policies the PHA will use upon the NSPIRE compliance date and contains changes made to the previously released version of Chapter 8. This includes:
	Updates for Notice PIH 2024-26.
	An explainer on the continued use of the term *housing quality standards.*
	Various revisions for the HOTMA Voucher Final Rule. Policies effective prior to and upon specific effective dates are explicitly listed.
Chapter 9 HOTMA	Revisions to revert back to using the term *housing quality standards* as per the Voucher Final Rule.
	Clarification regarding permitting the family to submit more than one request for tenancy approval at a time.
	Clarification regarding PHA-owned units.
	Clarifications regarding HAP contract execution.
Chapter 10	Added section on family moves due to unit deficiencies per the HOTMA Voucher Final Rule.
	Clarified policy regarding voucher issuance and term of the voucher.
Chapter 11	Split Chapter 11 into two chapters: 11.A and 11.B.
	Chapter 11.B represents the policies the PHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 11. This includes:
	Minor clarifications regarding calculating annual income at reexamination.
	Required revisions for the HOTMA Voucher Final Rule, including revisions regarding changes in family unit size. Policies effective prior to and upon specific effective dates are explicitly called out.

Chapter 12	Added language that the section on failure to provide consent is effective upon the PHA’s HOTMA compliance date.
	Added a section on the asset limitation with a callout effective upon the PHA’s HOTMA compliance date.
	Clarification regarding insufficient funding.
	References to housing quality standards.
Chapter 13	Clarifications to bring content in line with the *HCV Landlord Strategies Guidebook.*
	Reverted references to *housing quality standards.*
Chapter 15	Changes for the HOTMA Voucher Final Rule regarding manufactured home space rentals, eligible housing expenses, distribution of HAP, and single HAP to family.
	Reverted references to *housing quality standards.*
	Minor clarifications regarding homeownership counseling and homeownership assistance payments.
Chapter 16	Required revisions for the HOTMA Voucher Final Rule, including revisions concerning payment standards and the use of SAFMRs.
	Reverted references to *housing quality standards.*
Chapter 17	Revised and restated for the HOTMA Voucher Final Rule.
Chapter 18	Reverted references to *housing quality standards.*
	Citation updates for Notice PIH 2019-23, REV-4, as amended by RAD Supplemental Notice 4B.
	Multiple revisions for the HOTMA Voucher Final Rule throughout the chapter. Policies effective prior to and upon specific effective dates are explicitly listed.
Chapter 19	Multiple clarifications to the section on FUP vouchers.
	Changes to the VASH section to account for the requirements set forth in the *Federal Register* on August 13, 2024.
	Changes to the Mainstream section to account for the requirements set forth in Notice PIH 2024-30.

Attachment A

Admission and Continued Occupancy Policy (ACOP 2026)

Chapters to the ACOP with substantive revisions:
[changes are denoted as MHA or HUD (via Nan McKay)]

Intro	HUD		Revised and restated Introduction based on implementation of new Housing and Opportunity Through Modernization Act of 2016 (HOTMA), with references to HUD-delayed compliance date (hereinafter "HOTMA 102/104").
Chapter 1	HUD		Restated chapter with a general overview of the entire MHA public housing program and a description of the ACOP.
Chapter 2	HUD	Page 2-4	Revised language about discrimination complaints and VAWA complaints
Chapter 3	HUD	Page 3-9	Deletion of 180-day requirement to determine of family member in nursing home is considered "permanently absent."
	HUD	Page 3-15	Clarifies MHA policy that denial by applicant of PHA access to financial requirements will result in denial of admission.
	HUD	Page 3-19	Deletes the net asset requirement of $100,000 and changes it to the annual HUD-published asset limitation amount.
	HUD	Page 3-20	Clarifies that MHA does not have discretion to not enforce HUD's asset limitation test at admission.
Chapter 4	HUD	Page 4-7	Adds that waiting list updates from MHA may be sent by first class mail or email.
		Page 4-13	Adds that notification of selection from the waiting list by MHA can be done by mail or email
Chapter 5	HUD	Page 5-4	Clarifies that requests for exceptions to occupancy standards must be in writing, which includes email.
	HUD	Page 5-6	Adds that MHA telephone offer confirmations may be sent by mail or email.
	MHA	Page 5-7	Removes an applicant's right to an informal hearing if they reject a unit offer without good cause.
Chapter 6.A.	HUD	Page 6-1	Renames Chapter 6 to "Chapter 6.A." to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
Chapter 6.B.	HUD	Page 6-1,	Renames Chapter 6 to "Chapter 6.B." to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
	HUD	Page 6-2	Clarifies that a family's annual income is the gross income before garnishment or withholds for child support, taxes, and other listed debts.
	HUD	Page 6-8	Clarifies that income earned as a day laborer or seasonal work is not considered nonrecurring income and must be counted as income.
	HUD	Page 6-11	Clarifies that income earned as an independent contractor or a "gig worker" is not considered nonrecurring income and must be counted as income.
	HUD	Page 6-17	Clarifies definition of "periodic payments."

	HUD	Page 6-17	Clarifies that "workers' compensation" is always excluded from annual income.
	HUD	Page 6-20	Clarifies that regular in-kind donations from friends and family members are included as income.
	HUD	Page 6-22	Clarifies that a civil rights settlement or judgment can be counted toward net family assets.
	HUD	Page 6-31	Revised language for asset inclusions and exclusions.
	HUD	Page 6-47	Revised language for what qualifies as "health and medical care expenses."
	HUD	Page 6-48	Adds summary table of typical allowable health and medical care expenses.
	HUD	Page 6-52, Page 6-68	Deletes references to EID (Earned Income Disallowance).
	HUD	Page 6-69	Changes net asset valuation for valuing annual income from $50,000 to "the HUD-published threshold amount." (This is a global change throughout ACOP).
Chapter 7.A.	HUD		Renames Chapter 7 to "Chapter 7.A." to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
Chapter 7.B.	HUD		Renames Chapter 7 to "Chapter 7.B." to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
	HUD	Page 7-2	Adds that children turning 18 must sign the required Consent to Release of Information Form HUD-9886 within 10 business day of turning 18 years of age.
	HUD	Page 7-8	Allows MHA to use a streamlined reexamination process by applying a COLA/inflationary adjustment factor to fixed-income sources.
	HUD	Page 7-11	Eliminates reference to IVT reports for annual income reexaminations.
	HUD	Page 7-26	Changes requirement that SSA benefit verification letter be dated within the last 60 days to "within the appropriate benefit year."
	HUD	Page 7-34	Changes real property ownership restriction to eliminate requirement that it be "suitable for occupancy."
Chapter 8	HUD	Page 8-6	MHA must add a provision to the lease stating that it will give at least 30 days' notice for nonpayment of rent before filing for eviction.
	MHA	Page 8-11, Page 8-13	Adds that repeated or excessive damages to a unit are grounds for a lease termination in addition to tenant being billed for the damage.
		Page 8-16	Adds that MHA's smoke free policy "is applicable to all residents, household members, employees, guests, and service persons."
Chapter 9	HUD		Renames Chapter 9 to "Chapter 9.A." to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
		Page 9-2	Adds that PHA's have the option of using a Safe Harbor income verification to verify gross annual income referenced in Chapter 7.
		Page 9-6 Page 9-7	Clarifies that the flat rent income extended reexamination rules do not apply to over-income families which must be reexamined at 12 and 24 months.
Chapter 9	HUD		Renames Chapter 9 to "Chapter 9.B." to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
	HUD	Page 9-20	Adds that emails suffice as written notifications to and from residents and MHA.
Chapter 10	HUD	Page 10-7	Emphasizes that animals must be registered and approved before they are brought onto the premises.

	MHA	Page 10-10	Emphasizes that animals must be on a leash when outdoors and under the direct control of a person. Emphasizes that the feeding of stray or wild animals includes birds.
	HUD	Page 10-11	Adds that pet owners must control the noise of pets so that they are not a nuisance to other residents.
	MHA	Page 10-11	Clarifies that no animal may be tethered or chained in or out of a dwelling at any time.
	HUD & MHA	Page 10-13	Clarifies the animals not owned by a tenant are not allowed on the premises.
	MHA	Page 10-14 Page 10-28	Adds that a vicious or dangerous animal must be removed within 10 days. MHA Pet Permit Application restates that animals must be under direct control of a person, cannot be tethered or chained outside, and the person designated on the registration form must remove the animal if the pet owner is incapacitated or not available.
Chapter 11	HUD	Page 11-3,4	Adds restrictions of what constitutes "Community Service."
Chapter 12	MHA	Page 12-8	Adds that a family transfer request will be denied if there is evidence of property damage from abuse and/or has not made payment arrangements for the damage.
Chapter 13	HUD	Page 13-2	Revocation of consent to access financial records will result in termination of assistance
		Page 13-6	Over-income families will receive 3 notifications over a 24-month period about their over-income status.
	MHA	Page 13-8	MHA's new policy is that over-income families tenancy will be terminated if over-income for 24 consecutive months.
	MHA	Page 13-14	Adds that four late payments for other than rent constitute "repeated late payment" and termination of the lease.
	MHA	Page 13-14	Adds that a failure to follow household obligations includes the failure to abide by MHA's parking and pet policies.
	HUD	Page 13-7	Adds that MHA has discretion with respect to how it treats the application of HUD's asset limitation at annual and interim reexamination.
	MHA	Page 13-27	Specifies that MHA will issues a 10-day notice for lease termination where the health and safety of other persons is threatened, or if any member of the household is engaging in drug-related or violent criminal activity, of if any member of the household is convicted of a felony.
Chapter 14	MHA	Page 14-14	In grievances involving the removal of an alleged vicious animal, a request for formal hearing will not be allowed until the animal is first removed from MHA property. If not removed within 5-business days, the informal settlement process will become final.
Chapter 16	HUD	Page 16-23	A request for VAWA protection will be denied if MHA's request for third-party documentation is not complied with.
Lease Part 1B	MHA	Page 3	To avoid a late charge, rent must be paid by end of business (4:30 p.m.) on the 5th calendar day, including weekends and holidays.

“	MHA	Page 7	Clarification that changes in income must be reported within 10 business days.
Rules and Regulations	MHA	Page 7	Deletion of rule that 3 lease violations may result in an eviction notice.
Glossary	Nan		Adds defined terms cited elsewhere in the ACOP pertaining to HOTMA or HOTMA 102/104.

Attachment A

Administrative Plan (ADMIN 2026)

Chapters of the Administrative Plan for the MHA Section 8 Housing Choice Voucher Program with substantive revisions based on implementation of new Housing and Opportunity Through Modernization Act of 2016 (HOTMA):

Introduction	Revised and Restated - Added explanation of HOTMA changes throughout the policy document, including changes for Sections 102 and 104 and the HOTMA Voucher Final Rule, including explanation of the use of HQS and NSPIRE in the policy document.
Chapter 1	Added information on the HOTMA Voucher Final Rule to the Overview and History of the Program. Updated terminology from NSPIRE to "minimum quality standards" per the HOTMA Voucher Final Rule. Added policies on increases and decreases in the payment standard to the list of required plan contents.
Chapter 2	Added additional examples to the list of reasonable accommodation types.
Chapter 3	Added policies that will be effective prior to the PHA's HOTMA compliance date. Added policies for HOTMA that will become effective upon MHA's compliance date. Clarified policy language on live-in aides to better align with fair housing best practices. Added families eligible for VASH to the list of eligible applicant families. Clarified language regarding the EIV Income Report.
Chapter 5	Clarified fair housing and NSPIRE-related language throughout the chapter to bring the content current with the HOTMA Final Rule.
Chapter 6	Split Chapter 6 into two chapters: 6.A and 6.B. Chapter 6.B represents the policies MHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 6. This includes: Clarifications and corrections regarding student financial assistance requirements under HOTMA. Clarifications regarding the treatment of alimony and child support. Clarifications regarding amounts adjusted annually under inflation under HOTMA. Updates to the list of federally mandated income exclusions. Clarifications regarding necessary and non-necessary personal property. Clarifications regarding health and medical care expenses.

	Required changes for the HOTMA Voucher Final Rule, including changes regarding increases and decreases in payment standards. Policies effective prior to and upon specific effective dates are explicitly listed.
	Additions to the section on applying utility allowances regarding flat fees and PBV developments.
Chapter 7	Split Chapter 7 into two chapters: 7.A and 7.B.
	Chapter 7.B represents the policies MHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 7. This includes:
	Changes regarding the use of consent forms, specifically as related to HUD-9886-A.
	Clarifications regarding amounts adjusted annually under inflation under HOTMA.
	Policy revisions for streamlined income determinations from fixed sources of income.
	Certain updates for Notice PIH 2023-27 regarding verification requirements, use of EIV self- certification, verification of net family assets, and treatment of zero-income families.
Chapter 8	Split Chapter 8 into two chapters: 8.A and 8.B.
	Chapter 8.B represents the policies the PHA will use upon the NSPIRE compliance date and contains changes made to the previously released version of Chapter 8. This includes:
	Updates for Notice PIH 2024-26.
	An explainer on the continued use of the term *housing quality standards.*
	Various revisions for the HOTMA Voucher Final Rule. Policies effective prior to and upon specific effective dates are explicitly listed.
Chapter 9 HOTMA	Revisions to revert back to using the term *housing quality standards* as per the Voucher Final Rule.
	Clarification regarding permitting the family to submit more than one request for tenancy approval at a time.
	Clarification regarding PHA-owned units.
	Clarifications regarding HAP contract execution.
Chapter 10	Added section on family moves due to unit deficiencies per the HOTMA Voucher Final Rule.
	Clarified policy regarding voucher issuance and term of the voucher.
Chapter 11	Split Chapter 11 into two chapters: 11.A and 11.B.
	Chapter 11.B represents the policies the PHA will use upon the HOTMA compliance date and contains changes made to the previously released version of Chapter 11. This includes:
	Minor clarifications regarding calculating annual income at reexamination.
	Required revisions for the HOTMA Voucher Final Rule, including revisions regarding changes in family unit size. Policies effective prior to and upon specific effective dates are explicitly called out.

Chapter 12	Added language that the section on failure to provide consent is effective upon the PHA's HOTMA compliance date.
	Added a section on the asset limitation with a callout effective upon the PHA's HOTMA compliance date.
	Clarification regarding insufficient funding.
	References to housing quality standards.
Chapter 13	Clarifications to bring content in line with the *HCV Landlord Strategies Guidebook.*
	Reverted references to *housing quality standards.*
Chapter 15	Changes for the HOTMA Voucher Final Rule regarding manufactured home space rentals, eligible housing expenses, distribution of HAP, and single HAP to family.
	Reverted references to *housing quality standards.*
	Minor clarifications regarding homeownership counseling and homeownership assistance payments.
Chapter 16	Required revisions for the HOTMA Voucher Final Rule, including revisions concerning payment standards and the use of SAFMRs.
	Reverted references to *housing quality standards.*
Chapter 17	Revised and restated for the HOTMA Voucher Final Rule.
Chapter 18	Reverted references to *housing quality standards.*
	Citation updates for Notice PIH 2019-23, REV-4, as amended by RAD Supplemental Notice 4B.
	Multiple revisions for the HOTMA Voucher Final Rule throughout the chapter. Policies effective prior to and upon specific effective dates are explicitly listed.
Chapter 19	Multiple clarifications to the section on FUP vouchers.
	Changes to the VASH section to account for the requirements set forth in the *Federal Register* on August 13, 2024.
	Changes to the Mainstream section to account for the requirements set forth in Notice PIH 2024-30.

Attachment A

Admission and Continued Occupancy Policy (ACOP 2026)

Chapters to the ACOP with substantive revisions:
[changes are denoted as MHA or HUD (via Nan McKay)]

Intro	HUD		Revised and restated Introduction based on implementation of new Housing and Opportunity Through Modernization Act of 2016 (HOTMA), with references to HUD-delayed compliance date (hereinafter "HOTMA 102/104").
Chapter 1	HUD		Restated chapter with a general overview of the entire MHA public housing program and a description of the ACOP.
Chapter 2	HUD	Page 2-4	Revised language about discrimination complaints and VAWA complaints
Chapter 3	HUD	Page 3-9	Deletion of 180-day requirement to determine of family member in nursing home is considered "permanently absent."
	HUD	Page 3-15	Clarifies MHA policy that denial by applicant of PHA access to financial requirements will result in denial of admission.
	HUD	Page 3-19	Deletes the net asset requirement of $100,000 and changes it to the annual HUD-published asset limitation amount.
	HUD	Page 3-20	Clarifies that MHA does not have discretion to not enforce HUD's asset limitation test at admission.
Chapter 4	HUD	Page 4-7	Adds that waiting list updates from MHA may be sent by first class mail or email.
		Page 4-13	Adds that notification of selection from the waiting list by MHA can be done by mail or email
Chapter 5	HUD	Page 5-4	Clarifies that requests for exceptions to occupancy standards must be in writing, which includes email.
	HUD	Page 5-6	Adds that MHA telephone offer confirmations may be sent by mail or email.
	MHA	Page 5-7	Removes an applicant's right to an informal hearing if they reject a unit offer without good cause.
Chapter 6.A.	HUD	Page 6-1	Renames Chapter 6 to "Chapter 6.A." to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
Chapter 6.B.	HUD	Page 6-1,	Renames Chapter 6 to "Chapter 6.B." to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
	HUD	Page 6-2	Clarifies that a family's annual income is the gross income before garnishment or withholds for child support, taxes, and other listed debts.
	HUD	Page 6-8	Clarifies that income earned as a day laborer or seasonal work is not considered nonrecurring income and must be counted as income.
	HUD	Page 6-11	Clarifies that income earned as an independent contractor or a "gig worker" is not considered nonrecurring income and must be counted as income.
	HUD	Page 6-17	Clarifies definition of "periodic payments."

	HUD	Page 6-17	Clarifies that “workers’ compensation” is always excluded from annual income.
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	HUD	Page 6-31	Revised language for asset inclusions and exclusions.
	HUD	Page 6-47	Revised language for what qualifies as “health and medical care expenses.”
	HUD	Page 6-48	Adds summary table of typical allowable health and medical care expenses.
	HUD	Page 6-52, Page 6-68	Deletes references to EID (Earned Income Disallowance).
	HUD	Page 6-69	Changes net asset valuation for valuing annual income from $50,000 to “the HUD-published threshold amount.” (This is a global change throughout ACOP).
Chapter 7.A.	HUD		Renames Chapter 7 to “Chapter 7.A.” to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
Chapter 7.B.	HUD		Renames Chapter 7 to “Chapter 7.B.” to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
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Chapter 8	HUD	Page 8-6	MHA must add a provision to the lease stating that it will give at least 30 days’ notice for nonpayment of rent before filing for eviction.
	MHA	Page 8-11, Page 8-13	Adds that repeated or excessive damages to a unit are grounds for a lease termination in addition to tenant being billed for the damage.
		Page 8-16	Adds that MHA’s smoke free policy “is applicable to all residents, household members, employees, guests, and service persons.”
Chapter 9	HUD		Renames Chapter 9 to “Chapter 9.A.” to clarify that its terms are applicable only prior to the HOTMA 102/104 compliance date.
		Page 9-2	Adds that PHA’s have the option of using a Safe Harbor income verification to verify gross annual income referenced in Chapter 7.
		Page 9-6 Page 9-7	Clarifies that the flat rent income extended reexamination rules do not apply to over-income families which must be reexamined at 12 and 24 months.
Chapter 9	HUD		Renames Chapter 9 to “Chapter 9.B.” to clarify that its terms are applicable only after the HOTMA 102/104 compliance date.
	HUD	Page 9-20	Adds that emails suffice as written notifications to and from residents and MHA.
Chapter 10	HUD	Page 10-7	Emphasizes that animals must be registered and approved before they are brought onto the premises.

	MHA	Page 10-10	Emphasizes that animals must be on a leash when outdoors and under the direct control of a person. Emphasizes that the feeding of stray or wild animals includes birds.
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	MHA	Page 10-11	Clarifies that no animal may be tethered or chained in or out of a dwelling at any time.
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Chapter 11	HUD	Page 11-3,4	Adds restrictions of what constitutes "Community Service."
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Chapter 14	MHA	Page 14-14	In grievances involving the removal of an alleged vicious animal, a request for formal hearing will not be allowed until the animal is first removed from MHA property. If not removed within 5-business days, the informal settlement process will become final.
Chapter 16	HUD	Page 16-23	A request for VAWA protection will be denied if MHA's request for third-party documentation is not complied with.
Lease Part 1B	MHA	Page 3	To avoid a late charge, rent must be paid by end of business (4:30 p.m.) on the 5th calendar day, including weekends and holidays.

“	MHA	Page 7	Clarification that changes in income must be reported within 10 business days.
Rules and Regulations	MHA	Page 7	Deletion of rule that 3 lease violations may result in an eviction notice.
Glossary	Nan		Adds defined terms cited elsewhere in the ACOP pertaining to HOTMA or HOTMA 102/104.

Financial Resources: Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
1. Federal Grants (FY 2026 Grants)		
a) Public Housing Operating Fund	$1,170,853	PH Operations
b) Public Housing Capital Fund	$1,379,928	Modernization
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	$251,221	Rental Assistance
f) PHDEP (including any Technical Assistance funds)		
g) ROSS Grants	$125,832	FSS & ROSS Programs
h) CDBG		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (list below) **(unobligated funds only)**		
Capital Fund 501-25	$1,379,928	PH Capital Improvements
3. Public Housing Dwelling Rental Income	$1,491,597	PH Operations
4. Other Income (list below)		
Laundry	$5,100	PH Operations
5. Non-Federal Sources (list below)		
Total Resources	**$5,804,459**	

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4. Other Income (list below)		
Laundry	$5,100	PH Operations
5. Non-Federal Sources (list below)		
Total Resources	**$5,804,459**	

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

MHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of MHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

MHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, MHA must comply with the following steps:

Step 1. MHA must determine the average income of all families residing in all MHA's covered developments. MHA may use the median income, instead of average income, provided that MHA includes a written explanation in its annual plan justifying the use of median income.

> MHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. MHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, MHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

> MHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. MHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30percent of median income, whichever number is higher).

Step 4. MHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, MHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances MHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by MHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and MHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under MHA's deconcentration policy. MHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under MHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, MHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

For developments outside the EIR MHA will take the following actions to provide for deconcentration of poverty and income mixing:

MHA will strive to create mixed-income communities and lessen the concentration of very-low income families within the Housing Authority's public housing developments through admissions policies designed to bring higher income tenants into lower income developments and lower income tenants into higher income developments. This policy shall not be construed to impose or require any specific income or racial quotas for any public housing development owned by MHA.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

MHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of MHA's deconcentration policies must be in included in its annual plan [24 CFR 903.7(b)].

MHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, MHA must comply with the following steps:

Step 1. MHA must determine the average income of all families residing in all MHA's covered developments. MHA may use the median income, instead of average income, provided that MHA includes a written explanation in its annual plan justifying the use of median income.

> MHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. MHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, MHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

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RAB Comment

Moline Housing Authority
Resident Advisory Board
Comments and Recommendations
January 9, 2026

I am Joni Feliksiak and I am representing the Resident Advisory Board. The other members of the board are Corey Strother and Lori Geest.

Each year the RAB is asked to review, solicit resident comments, and make recommendations to the Moline Housing Authority staff and Board of Commissioners regarding the Agency Plan.

The RAB met to solicit comments regarding changes in the plan. We did not receive comments from the residents regarding the proposed changes. The RAB is endorsing the proposed changes.

Respectfully,

Joni Feliksiak

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RAB Representative

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