



*Growing Communities One Family At A Time  
For More Than 70 Years*

**Delmonize Smith, Ph.D.**  
**Chairman**

**James Bolte**  
**Vice Chairman**

**Leon D. Fountain**  
**Commissioner**

**Delvin L. Sullivan**  
**Commissioner**

**Shaquila Willie**  
**Commissioner**

**Antonio McGinnis, Sr.**  
**Executive Director/CEO**

REGULAR  
BOARD MEETING  
of the  
HUNTSVILLE HOUSING AUTHORITY  
December 20, 2021  
12:00 P.M.  
**(Virtual)**

**REGULAR MEETING**

CALL TO ORDER

ROLL CALL

APPROVAL OF MINUTES: November 15, 2021

OLD BUSINESS

NEW BUSINESS

**Financial Services**

1. Act on Resolution Approving Third Quarter Charge-offs for the Quarter Ending December 31, 2021.
2. Presentation of Cumulative Low-Income Housing Finance Report for the Period Ending October 31, 2021.
3. Presentation of CARES ACT Funding for the Period Ending October 31, 2021.

**Public Housing Operations**

1. Act on a Resolution Approving Revision of the Admissions and Continued Occupancy Policy (ACOP) for Public Housing.

**Executive**

1. Act on Resolution Authorizing the Execution and Submission of PHA Certifications of Compliance with the PHA Plan and Related Regulations Including Required Civil Rights Certification, Annual and Five-Year Budgets and FY 2022 Five Year and Annual PHA Plan.



EXECUTIVE DIRECTOR/CEO COMMENTS

PUBLIC COMMENTS

COMMISSIONER COMMENTS

ADJOURNMENT



MINUTES OF THE REGULAR MEETING OF THE  
BOARD OF COMMISSIONERS OF  
HUNTSVILLE HOUSING AUTHORITY

November 15, 2021

The Board of Commissioners Meeting of the Huntsville Housing Authority  
November 15, 2021.

PRESENT

Chairman Dr. Delmonize Smith  
Vice Chairman James Bolte  
Commissioner Leon Fountain  
Commissioner Delvin Sullivan  
Commissioner Shaquila Willie

ABSENT

Chairman Smith declared a quorum present.

Also present were the following: Antonio McGinnis, Sr., Executive Director/CEO; Mr. Richard Raleigh, Attorney; Turkessa Coleman-Lacey, Deputy Executive Director; Carol Jones, Director of Human Resources; Paula Bingham, Director of Assisted Housing; Teresa Wade, Director of Finance/CFO; Teresa Boyd, Director of Public Housing Operations; Neil Andrew, Information Technology Specialist; and Jacqueline Egbujo, Executive Assistant.

APPROVAL OF MINUTES

A motion was made to accept the minutes from the regular board meeting held on November 15, 2021. Commissioner Sullivan made a motion to approve the minutes and Commissioner Fountain seconded the motion. Upon affirmative vote, the Chairman declared the said motion carried.

OLD BUSINESS

N/A

## NEW BUSINESS

### Financial Services

1. Presentation of Cumulative Low-Income Housing Finance Report for the Period Ending September 30, 2021.

Mrs. Teresa Wade-Chase reviewed the report in detail and it was accepted as presented.

### Assisted Housing

1. Act on a Resolution Approving Revised Payment Standards for the Housing Choice Voucher Program.

## **RESOLUTION NO. 2021-41**

WHEREAS, The Department of Housing and Urban Development (HUD) requires all housing authorities to adopt a payment standard schedule that establishes the voucher payment standard amounts for the PHA jurisdiction; and

WHEREAS, the Huntsville Housing Authority (HHA) uses the payment standard as the maximum subsidy HHA can provide toward the gross rent (rent plus utility allowance); and

WHEREAS, HUD allows the housing authority to set payment standards between 90% - 110% of the Fair Market Rent (FMR) and may also establish exception payment standards for a zip code area above the basic range for the metropolitan FMR based on the HUD published Small Area FMRs; and

WHEREAS, in order to continue serving families outside high poverty areas and so families can afford to lease units within the payment standard, it is deemed necessary to revise the current payment standards to be effective January 1, 2022.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of Huntsville Housing Authority, hereby to adopt revised payment standards for the Housing Choice Voucher Program and further resolves that the Executive Director/CEO is hereby directed to operate in accordance with the revised payment standards as adopted.

Vice Chairman Bolte moved the foregoing Resolution be adopted with noted recommended actions. Commissioner Fountain seconded the motion, Chairman Smith called the roll and the ayes and nays were as follows:

AYES:  
Vice Chairman James Bolte  
Commissioner Leon Fountain  
Commissioner Delvin Sullivan

NAYS:

ABSTAIN:

Chairman Smith thereupon declared the said Resolution adopted this 15<sup>th</sup> day of November, 2021.

1. Act on a Resolution Approving Revision to the Administrative Plan for the Housing Choice Voucher Program.

### **RESOLUTION NO. 2021-42**

WHEREAS, Huntsville Housing Authority (HHA) has adopted an Administrative Plan for the Housing Choice Voucher (HCV) Program; and

WHEREAS, the United States Department of Housing and Urban Development (HUD) has mandated that housing authorities must develop expanded, clear and orderly procedures to govern administration of the Housing Choice Voucher Program; and

WHEREAS, the Administrative Plan states HHA policy on matters for which the HHA has discretion to establish local policies in accordance with HUD requirements; and

WHEREAS, HHA has revised the Housing Choice Voucher Program Administrative Plan for the Emergency Housing Voucher Program in order to comply with policies for the administration of the HCV Program that have been mandated by HUD and are in accordance with industry standards;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of Huntsville Housing Authority hereby adopts the revision to the Housing Choice Voucher Program Administrative Plan and further resolves that the Executive Director/CEO is hereby directed to operate in accordance with the revised plan as adopted.

Commissioner Sullivan moved the foregoing Resolution be adopted with noted recommended actions. Commissioner Fountain seconded the motion, Chairman Smith called the roll and the ayes and nays were as follows:

AYES:  
Vice Chairman James Bolte  
Commissioner Leon Fountain  
Commissioner Delvin Sullivan

NAYS:

ABSTAIN:

Chairman Smith thereupon declared the said Resolution adopted this 15<sup>th</sup> day of November, 2021.

## EXECUTIVE DIRECTOR/CEO COMMENTS

Mr. McGinnis thanked Mrs. Paula Bingham for her report to the board.

Mr. McGinnis said that he would like to share a few things, and then allow our staff members the chance to present updates on self-sufficiency. Mr. McGinnis stated that he had a chance to meet with the board members one-by-one, which gave him great ideas on how to move forward and stay in line with the strategic plan. Also, provide updates on how we're doing that. He stated that today we will discuss how we are moving our families to a level of self-sufficiency. He stated that you will hear from our Assisted Housing, Family Self-sufficiency coordinators, and hopefully, we can get our Homeownership coordinator to join us and provide updates on the family homeownership report.

Mr. McGinnis stated that he had a chance to talk with Ashley Jones, and we are going to close on the week of December 13, for the Pollard Circle property. He stated that he will keep everyone in the loop and provide updates.

Mr. McGinnis stated that we have also been in contact with Michael's group which is the company that was awarded the contract for the Sparkman Homes. Mr. McGinnis stated that there were a couple of disconnects with the communications. He stated that he had a chance to speak with them this morning and they will send over a sample MBA for us to look over, so we will be able to go into negotiation with them over the redevelopment of the Sparkman Homes property. He stated that he is excited about those two things.

McGinnis stated that he just left a meeting with our partners at Calvary Hills Center for the EnVision Center. One thing that we are trying to do is put the motion in play so that at the beginning of the year we will have centers in every neighborhood so that our residents could walk too. If residents are not able to walk to those centers, then we will try to provide transportation through our Resident Service Department. Mr. McGinnis stated that this is one of those areas where we are trying to focus on helping families become self-sufficient. As an agency we really need to wrap our arms around the population of people that we serve, which most times that's thirty percent of the area below income.

Mr. McGinnis stated that he is a part of the Housing Solutions workshop with a few members of the City of Huntsville, Dennis Maxon, Scott Erwin, and a few of the non-profit organizations. He stated that we are coming up with a housing solution plan that hopefully, they will be able to submit. This plan will serve as a blueprint to assist our resident's needs. Everyone is in agreement that we really need to focus on that thirty percent and below. He stated that a lot of times we don't necessarily have a plan for that population. So, hopefully, in the near future, we are able to come up with a plan and we are able to present something not only to our board, our staff but as a city as a whole. He stated that he is excited about this plan for assisting our residents.

Mr. McGinnis stated that our town hall meetings have been going well. He stated that he wanted to apologize for the mix-up last week with the time change. Mr. McGinnis did state that we have a couple of town hall meetings that will take place this week. He

informed them that Brookside will have theirs at 1:00 pm. And 3:00 pm for Johnson Towers.

Mr. McGinnis stated that The Legacy Center will also provide Thanksgiving dinner for our residents at Johnson Towers. He stated that they are going to prepare the meals and deliver them door to door. He stated that he was excited about those types of partnerships that look out for our residents.

Mr. McGinnis gave an update on the basketball team that takes place every year around the Martin Luther King holiday weekend. We are partnering with Resident Services and the Boys & Girls Club to take two teams that represent Huntsville in the state basketball tournament. He stated that was a hard sale for him but after his arm was twisted a couple of times, he gave into it. He stated that he is happy that he partnered with those two groups as well.

Mr. McGinnis stated that we are entertaining the sale of the Mahogany Row apartments. He stated that we ran into some problems when they went in to rehab it costed more than expected. He stated that we have a company that is interested in buying those properties. He stated that he will inform the Board as we move forward with those properties.

Mr. McGinnis turned it over to Paula for the presentation of Family Self -Sufficiency update.

Mr. McGinnis stated that we have been working with Toyota Mazda. He stated that they have over twelve hundred jobs they are trying to fill. Residents that are in our FSS program could really be candidates for those jobs because they are the ones who are trying to increase their income level.

#### PUBLIC COMMENTS

N/A

#### COMMISSIONER COMMENTS

Vice-Chairman Bolte stated that those are great reports and he appreciates him for sharing those, because it really rounds out a board meeting. He stated that no offense to Teresa but it not all numbers. This is impacting real families and its good to hear those stories.

Vice-Chairman Bolte asked Mr. McGinnis how many units does Mahogany Row has.

Mr. McGinnis stated that its twelve units. Mr. McGinnis asked for Michael Norment to continue the conversation about the properties.

Commissioner Fountain stated that it may be easier to sell all the units.

Mr. McGinnis stated that they will utilize the units as Section 8 units. He stated that it will be listed in the contract.

Chairman Smith stated that there are no open comments. He asked everyone if they had any comments.

Commissioner Sullivan asked questions about the Assisted Housing payment standards. He stated that he wanted to just verify the Huntsville and Madison locations as it pertains to the area codes but is the same in dollar amount. He stated that it doesn't make sense to him that he can live in the Northside of Huntsville for the same price in Madison. No response was needed he just wanted to see what the price difference is.

Commissioner Willie stated that she wanted to ask about rent rates but her questions were answered. She said that she didn't have anything else.

Commissioner Fountain stated that he did not have any additional, no comment.

Vice-Chairman Bolte just wanted to say happy birthday to the Veterans and Happy Thanksgiving to everyone. He also wanted to discuss future board meetings.

Chairman Smith stated that he wanted to piggyback off Vice-Chairman Bolte, we will have the December Board meeting in person in January, but we will monitor this and take it day-by-day.

#### ADJOURNMENT

With there being no further comments, Chairman Smith declared the meeting adjourned.

Attest

\_\_\_\_\_  
Dr. Delmonize Smith, Chairman

\_\_\_\_\_  
Antonio McGinnis, Secretary



**HUNTSVILLE HOUSING AUTHORITY**

**Board of Commissioners' Meeting  
Agenda Item  
Control Document**

**Date:** December 9, 2021

**HHA Staff Representative:** Teresa Wade-Chase, Director of Finance/CFO

**Department:** Financial Services

**Board of Commissioners' Meeting (Date):** December 20, 2021, at 12:00 p.m. (VIRTUAL)

**Board Agenda Item(s):**

1. Act on Resolution Approving Third Quarter Charge-offs for the Quarter Ending December 31, 2021.
2. Presentation of Cumulative Low-Income Housing Finance Report for the Period Ending October 31, 2021.
3. Presentation of CARES ACT Funding for the Period Ending October 31, 2021.

**Date/Time/Place of Board of Commissioners' Committee Meeting:**

Approved by:  / 12/14/21  
Antonio McGinnis, Sr. Date  
Executive Director/CEO/Contracting Officer

**Department's Committee's Certification:**

We have reviewed the above-referenced Board of Commissioners' agenda items, together with the related and supportive documents, and have found them satisfactory. We further concur with the Staff's recommendation to place them on the approved, final agenda to be presented to the Board for appropriate action with respect to the adoption of the resolution(s) approving and/or authorizing the execution of the said action(s).

**HHA Board Committee Member:** Chairman Dr. Delmonize Smith Date: 12/20/2021

**HHA Board Committee Member:** Vice Chairman James Bolte Date: 12/20/2021

**HHA Staff Member:**  Date: 12-14-2021

## **HUNTSVILLE HOUSING AUTHORITY**

### **REQUEST FOR BOARD ACTION**

**Authorizing Quarterly Charge-Offs for the Period Ending December 31, 2021**

**December 20, 2021**

#### **INTRODUCTION**

The Huntsville Housing Authority (HHA) has on its books \$17,414.66 owed by former residents who vacated September 1, 2021 through November 30, 2021.

#### **PURPOSE/OBJECTIVE**

The purpose of this request is to obtain approval to charge-off \$17,414.66 as collection losses for the quarter ending December 31, 2021.

#### **JUSTIFICATION/DESCRIPTION**

This action is necessary to remove uncollectible accounts from HHA's books.

#### **ECONOMIC IMPACT**

The economic impact is an expense in the amount of \$17,414.66; however, this amount is subject to partial recovery through the collection process. The breakdown of the charge-offs is as follows:

Rent	\$ 10,024.70
Maintenance Charges	\$ 2,507.96
Court Costs	\$ 1,134.00
Late Charges	\$ 1,508.00
Retroactive Rent	\$ 2,060.00
Bulk Cable	\$ 180.00

#### **ALTERNATIVES**

Not Applicable.


#### **ATTACHMENTS**


Quarterly Charge-Offs

## RECOMMENDATIONS

The Executive Director/CEO recommends that the aforesaid accounts in the amount of 17,414.66 be charged off as collection losses on the books of Huntsville Housing Authority.

  
Antonio McGinnis  
Executive Director/CEO

  
Teresa Wade-Chase  
Director of Finance

  
Date

  
Date

**Uncollectible Accounts**  
**For the Quarter Ending December 31, 2021**  
**FYE March 31, 2022**

Project	Rent	Maintenance Charges	Court Costs	Late Charges	Retroactive Rent	Returned Check	Utility Charge	Bulk Cable	Gross Balance	Number Accounts
002 Butler Terrace	301.00	34.20	-	125.00	-	-	-	-	460.20	4
004 Butler Terrace Addition	683.00	-	366.00	25.00	-	-	-	-	1,074.00	1
006 Northwoods	290.70	2,433.76	-	534.00	-	-	-	-	3,258.46	7
008 Johnson Towers	1,402.00	-	-	177.00	-	-	-	162.00	1,741.00	4
010 Searcy Homes	1,869.00	-	-	75.00	-	-	-	-	1,944.00	2
011 Todd Towers	15.00	-	-	25.00	-	-	-	18.00	58.00	1
014 L. R. Patton Apartments	1,219.00	40.00	768.00	75.00	2,060.00	-	-	-	4,162.00	4
016 Scattered Sites	620.00	-	-	50.00	-	-	-	-	670.00	1
019 Stone Manor	176.00	-	-	75.00	-	-	-	-	251.00	2
051 Brookside	2,771.00	-	-	225.00	-	-	-	-	2,996.00	3
052 Lincoln Park	678.00	-	-	122.00	-	-	-	-	800.00	4
<b>12/31/2021 Quarterly Total</b>	<b>10,024.70</b>	<b>2,507.96</b>	<b>1,134.00</b>	<b>1,508.00</b>	<b>2,060.00</b>	<b>-</b>	<b>-</b>	<b>180.00</b>	<b>17,414.66</b>	<b>33</b>
9/30/2021 Quarterly Total	15,400.80	11,490.85	3,082.00	1,204.00	13,390.00	-	-	90.00	44,657.65	33
6/30/2021 Quarterly Total	9,326.00	1,172.00	314.00	450.00	-	-	28.00	18.00	11,308.00	9
<b>12/31/2021 YTD TOTAL</b>	<b>34,751.50</b>	<b>15,170.81</b>	<b>4,530.00</b>	<b>3,162.00</b>	<b>15,450.00</b>	<b>-</b>	<b>28.00</b>	<b>288.00</b>	<b>73,380.31</b>	<b>75</b>

12/31/2020 Total	17,053.00	3,738.35	-	925.00	236.00	-	-	108.00	22,060.35	33
9/30/2020 Total	9,136.00	2,587.05	2,062.00	225.00	336.00	-	-	198.00	14,544.05	26
6/30/2020 Total	10,513.60	718.80	982.00	281.00	4,847.00	-	-	144.00	17,486.40	22
<b>12/31/2020 YTD TOTAL</b>	<b>36,702.60</b>	<b>7,044.20</b>	<b>3,044.00</b>	<b>1,431.00</b>	<b>5,419.00</b>	<b>-</b>	<b>-</b>	<b>450.00</b>	<b>54,090.80</b>	<b>81</b>

**Other Comparative Data**

Chg Off 12/31/21	Chg Off 09/01/21	Chg Off 06/30/21
Vacated	Vacated	Vacated
9/1/2021 thru 11/30/2021	6/1/2021 thru 8/31/2021	4/1/2021 thru 5/31/2021

Charge Offs	17,414.66	44,657.65	11,308.00
Rent Roll	695,532.94	680,423.00	448,191.00
	<b>2.50%</b>	<b>6.56%</b>	<b>2.52%</b>

SEPT-NOV 2021	JUNE-AUG	APRIL-MAY
Collections 2021	6,701.59	13,423.19
	19,317.39	

12/31/21 YTD Total	12/31/20 YTD Total	12/31/21 Monthly Average	12/31/20 Monthly Average
73,380.31	54,090.80	9,172.54	6,761.35
1,824,146.94	1,176,574.00	228,018.37	147,071.75
<b>4.02%</b>	<b>4.60%</b>	<b>4.02%</b>	<b>4.60%</b>

## HUNTSVILLE HOUSING AUTHORITY

### RESOLUTION AUTHORIZING QUARTERLY CHARGE-OFFS FOR PERIOD ENDING DECEMBER 31, 2021

#### RESOLUTION NO. 2021 - 43

WHEREAS, Huntsville Housing Authority (HHA) has on its books certain balances owed by former residents in the various low-income developments operated by HHA for the period ending December 31, 2021, in the amount of \$17,414.66:

Rent	\$ 10,024.70
Maintenance Charges	\$ 2,507.96
Court Costs	\$ 1,134.00
Late Charges	\$ 1,508.00
Retroactive Rent	\$ 2,060.00
Bulk Cable	\$ 180.00

WHEREAS, HHA has made and is making reasonable effort to collect said balances; and

WHEREAS, March is the last month of the fiscal year and all vacates should be reflected in the charge-offs; and

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Huntsville Housing Authority that the aforesaid accounts in the amount of \$17,414.66.

ADOPTED THIS 20<sup>th</sup> DAY OF DECEMBER, 2021.

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Dr. Delmonize Smith, Chairman

SEAL

Attest:

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Antonio McGinnis, Secretary

# Huntsville Housing Authority

200 Washington Street

Huntsville, AL 35801

(256) 539-0774

www.hsvha.org

## BAF, COCC and PH Combined

Fiscal Year End: 3/31/2022 Report By: Month 10/31/2021 Reporting Type: Balance Sheet

### All Accounts

	ANNUAL	MONTH ENDING AT 10/31/2021			YEAR TO DATE AT 10/31/2021		
		ACTUAL	BUDGET	VARIANCE Favorable (Unfavorable)	ACTUAL	BUDGET	VARIANCE Favorable (Unfavorable)
Revenue:							
Tenant Rental Revenue	2,572,944.00	222,130.00	214,412.00	7,718.00	1,541,313.40	1,500,884.00	40,429.40
Other Tenant Charges	35,497.00	5,725.00	2,558.11	2,766.89	35,519.00	20,706.77	14,812.23
Operating Subsidy	7,363,086.00	647,695.00	613,590.55	34,104.45	4,699,863.00	4,295,133.85	404,729.15
HUD PHA Operating Grant-CFP	756,392.00	54,592.61	63,032.67	(8,440.06)	382,148.27	441,228.85	(59,080.58)
Interest Income	0.00	1,992.58	0.00	1,992.58	13,791.31	0.00	13,791.31
Section 8 Rental Income	12,000.00	1,000.00	1,000.00	0.00	7,000.00	7,000.00	0.00
Management Fees - Public Housing	868,324.00	79,858.35	72,360.34	7,498.01	557,690.10	506,522.38	51,167.72
Bookkeeping Fees - PH & HCV	270,090.00	22,282.50	22,507.50	(225.00)	156,217.50	157,552.50	(1,335.00)
Asset Management Fees - Public Housing	181,560.00	15,130.00	15,130.00	0.00	105,910.00	105,910.00	0.00
Service Fee Revenue	299,177.00	23,525.35	24,931.42	(1,406.07)	165,591.95	174,519.94	(8,927.99)
Management Fees - Capital Fund	427,360.00	35,613.35	35,613.34	0.01	249,293.35	249,293.38	(0.03)
Management Fees - Section 8	242,208.00	20,064.00	20,184.00	(120.00)	146,604.45	141,288.00	5,316.45
Management Fees - 360 Properties	52,666.00	4,279.08	4,388.84	(109.76)	29,898.70	30,721.88	(823.18)
Other Income	203,887.00	23,132.09	16,990.61	6,141.48	838,352.21	118,934.27	719,417.94
Gain On Disposition of Fixed Assets	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Inter-AMP Transfer In	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Revenue	13,285,191.00	1,157,019.91	1,107,099.38	49,920.53	8,929,193.24	7,749,695.82	1,179,497.42
Expenses:							
Administration:							
Administrative Salaries	2,168,875.00	175,001.45	180,739.63	5,738.18	1,210,426.10	1,265,177.41	(54,751.31)
Compensated Absences	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Employee Benefits - Administrative	849,306.00	78,243.30	70,775.54	(7,467.76)	501,330.68	495,428.78	5,901.90
Audit Fees	34,000.00	0.00	2,833.38	2,833.38	34,160.00	19,833.66	14,326.34
Management Fees	868,323.00	79,858.35	72,360.29	(7,498.06)	564,674.55	506,522.03	58,152.52
Bookkeeping Fees	118,710.00	9,742.50	9,892.50	150.00	68,955.00	69,247.50	(292.50)
Advertising and Marketing	5,242.00	2,224.63	436.88	(1,787.75)	5,204.70	3,058.16	2,146.54
Total Expenses	4,034,256.00	390,878.23	390,248.58	(629.65)	2,384,195.63	2,384,195.63	0.00
Total	9,250,935.00	766,141.68	716,850.80	49,292.88	6,545,000.61	5,365,500.19	1,179,500.42

# BAF, COCC and PH Combined

Fiscal Year End: 3/31/2022 Report By: Month 10/31/2021 Reporting Type: Balance Sheet

All Accounts

YEAR TO DATE AT 10/31/2021

MONTH ENDING AT 10/31/2021

ANNUAL

	MONTH ENDING AT 10/31/2021			YEAR TO DATE AT 10/31/2021		
	BUDGET	ACTUAL	BUDGET	Variance Favorable (Unfavorable)	ACTUAL	BUDGET
Office Expense	417,923.00	34,725.63	34,827.25	101.62	0%	296,760.55
Legal	100,000.00	3,701.00	8,333.37	4,632.37	56%	52,866.81
Training and Travel	36,647.00	170.10	3,053.93	2,883.83	94%	14,146.26
Other Administrative Costs	154,123.00	12,768.20	12,843.79	75.59	1%	64,986.89
Total Administration	4,753,149.00	396,435.16	396,096.56	(338.60)	0%	2,813,511.54
Asset Management Fee	181,560.00	15,130.00	15,130.00	0.00	0%	105,910.00
Tenant Services:						
Salaries	109,027.00	8,037.43	9,085.61	1,048.18	12%	50,164.06
Relocation	0.00	0.00	0.00	0.00	0%	1,300.00
Employee Benefits - Tenant Services	75,428.00	6,988.47	6,285.70	(702.77)	(11%)	36,675.14
Other/Funding/Travel and Training	28,401.00	1,703.08	2,366.82	663.74	28%	9,868.38
Total Tenant Services	212,856.00	16,728.98	17,338.13	1,009.15	6%	98,007.58
Utilities:						
Other Utilities	119,297.00	9,832.44	9,941.46	109.02	1%	71,635.56
Water	415,639.00	29,215.84	34,636.62	5,420.78	16%	213,425.77
Electric	379,291.00	26,728.18	31,607.62	4,879.44	15%	214,786.07
Gas	50,983.00	3,159.68	4,248.62	1,088.94	26%	22,929.09
Sewage	611,821.00	40,694.88	50,985.12	10,290.24	20%	313,735.91
Total Utilities	1,577,031.00	109,631.02	131,419.44	21,788.42	17%	836,512.40
Maintenance:						
Labor - Maintenance	1,620,615.00	105,175.29	135,051.29	29,876.00	22%	835,188.08
Employee Benefits - Maintenance	812,001.00	58,805.71	67,666.80	8,861.09	13%	418,583.12
Materials	1,118,967.00	198,570.95	93,247.34	(105,323.61)	(113%)	692,556.98
Contract Costs	1,005,969.00	94,295.98	83,830.88	(10,465.10)	(12%)	602,727.46
Total Maintenance	4,557,552.00	456,847.93	379,796.31	(77,051.62)	(20%)	2,549,055.64
Protective Services:						
Protective Services Contract Costs	237,986.00	27,052.40	19,832.22	(7,220.18)	(36%)	161,785.02
Total Protective Services	237,986.00	27,052.40	19,832.22	(7,220.18)	(36%)	161,785.02
General Expenses:						
Insurance	1,173,273.00	108,035.42	97,772.89	(10,262.53)	(10%)	711,995.42

# BAF, COCC and PH Combined

Fiscal Year End: 3/31/2022 Report By: Month 10/31/2021 Reporting Type: Balance Sheet

All Accounts

	ANNUAL	MONTH ENDING AT 10/31/2021			YEAR TO DATE AT 10/31/2021		
		ACTUAL	BUDGET	VARIANCE Favorable (Unfavorable)	ACTUAL	BUDGET	VARIANCE Favorable (Unfavorable)
Other General Expenses	380,905.00	21,655.00	31,742.10	10,087.10 32%	150,073.00	222,194.70	72,121.70 32%
Payment In Lieu of Taxes	53,817.00	0.00	4,484.78	4,484.78 100%	0.00	31,393.46	31,393.46 100%
Total General Expenses	1,607,995.00	129,690.42	133,999.77	4,309.35 3%	862,068.42	937,998.39	75,929.97 8%
Other:							
Collection Loss (Bad Debt Expense)	100,000.00	(1,478.91)	8,333.37	9,812.28 118%	17,082.44	58,333.59	41,251.15 71%
Extraordinary Maintenance	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Extraordinary Items	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Casualty Loss	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Interest Mort or Bonds Payable	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Amortization of Bond Issue Costs	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
COCC Transfer to Section 8	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Inter AMP Transfer Out	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Loss Disposition of Fixed Assets	0.00	0.00	0.00	0.00 0%	0.00	0.00	0.00 0%
Total Other	100,000.00	(1,478.91)	8,333.37	9,812.28 118%	17,082.44	58,333.59	41,251.15 71%
Total Expenses	13,228,129.00	1,150,037.00	1,102,345.80	(47,691.20) (4%)	7,443,933.04	7,716,420.52	272,487.48 4%
Net Income/Loss	57,062.00	6,982.91	4,753.58	2,229.33 47%	1,485,260.20	33,275.30	1,451,984.90 4,364%

\*\*End of Report\*\*



## Explanations of Variances for October 31, 2021

- (1) Total Revenue – The increase in other income is due to the following; Re-payment of Balch Road predevelopment loan in the amount of \$488,480, Developer Fee Revenue in the amount of \$200,546 and the sale of multiple old vehicles in the amount of \$33,854.
- (2) Total Tenant Services – The allocation of resident services personnel to grant funded positions resulted in a favorable variance for this reporting period.
- (3) Total Protective Services – The unfavorable increase to Protective services is due to a new security contract for Todd and Johnson Towers providing 24 hours services.
- (4) Collection Loss – The favorable variance is due to the amount of monies we have collected that offsets the bad debt expense.

**Huntsville Housing Authority**  
**CARES ACT FUNDING**  
**Revenue and Expense Statement**  
**For the Period Ended November 30,2021**

	YTD 11/30/2021	YTD 06/30/2021	Variance
	Actual	Actual	
<b>Revenue:</b>			
CARES ACT Operating Subsidy	1,203,911		
<b>Total Revenue</b>	<b>1,203,911</b>		Funds available in eLOCCS March 27, 2020
<b>Expenses:</b>			
<b>Administration:</b>			
Administrative Salaries	235,251	220,406	14,845 (1)
Administration Temporary Labor	22,347	22,347	-
Employee Benefits	93,762	88,478	5,284 (1)
Office Expense	52,172	52,172	-
Other Administrative Costs	7,350	7,350	-
<b>Total Administration</b>	<b>410,882</b>	<b>390,753</b>	<b>20,129</b>
<b>Tenant Services</b>			
Salaries	306,177	306,177	-
Benefits	27,034	27,034	-
Other	51,490	51,490	-
<b>Total Tenant Services</b>	<b>384,701</b>	<b>384,701</b>	<b>-</b>
<b>Utilities:</b>			
Water	1,155	1,155	-
<b>Total Utilities</b>	<b>1,155</b>	<b>1,155</b>	<b>-</b>
<b>Maintenance:</b>			
Labor	212,789	212,789	-
Temporary Labor	14,861	14,861	-
Employee Benefits	133,507	133,507	-
Materials	-	-	-
<b>Total Maintenance</b>	<b>361,157</b>	<b>361,157</b>	<b>-</b>
<b>Protective Services:</b>			
Protective Services Contract Costs	9,642	9,642	-
<b>Total Protective Services</b>	<b>9,642</b>	<b>9,642</b>	<b>-</b>
<b>Subtotal Sites 47-002-47-052</b>	<b>1,167,537</b>	<b>1,147,408</b>	<b>20,129</b>
Tax Credit Properties Cares Act			
Gateway Place	19,818	19,818	0
Legacy Hill	10,530	10,530	0
Chestnut Glen	5,106	5,106	0
StoneRidge Villas	920	920	0
Subtotal Tax Credit Cares ACT	36,374	36,374	0
<b>Total Cares ACT Expenses</b>	<b>1,203,911</b>	<b>1,183,782</b>	<b>20,129</b>
<b>Balance of Cares Act Funds</b>	<b>0</b>	<b>Cares ACT Funding Available until December 31, 2021</b>	

# HUNTSVILLE HOUSING AUTHORITY

## Board of Commissioners' Meeting Agenda Item Control Document

**Date:** December 14, 2021

**HHA Staff Representative:** Terry Boyd, Director of Public Housing Operations


**Department:** Public Housing Operations

**Board of Commissioners' Meeting (Date):** December 20, 2021

**Board Agenda Item(s):**

1. Act on a Resolution Approving Revision of the Admissions and Continued Occupancy Policy (ACOP) for Public Housing.

**Date/Time/Place of Board of Commissioners' Meeting:** Monday, December 20, 2021, at 12:00 p.m.(virtual)

**Approved by:**  / 12/14/21  
Antonio McGinnis, Sr. Date  
Executive Director/CEO/Contracting Officer

### Department's Committee's Certification:

We have reviewed the above-referenced Board of Commissioners' agenda items, together with the related and supportive documents, and have found them satisfactory. We further concur with the Staff's recommendation to place them on the approved, final agenda to be presented to the Board for appropriate action with respect to the adoption of the resolution(s) approving and/or authorizing the execution of the said action(s).

**HHA Board Committee Member:** Chairman Delmonize Smith, Ph.D. Date: 12/20/2021

**HHA Board Committee Member:** Vice-Chairman James Bolte Date: 12/20/2021

**HHA Staff Member:**  Date: 12/14/2021

# **Huntsville Housing Authority**

## **REQUEST FOR BOARD ACTION**

### **Act on a Resolution Approving a Revision of the Admissions and Continued Occupancy Policy (ACOP) for Public Housing**

**December 20, 2021**

#### **INTRODUCTION**

Act on a Resolution Approving the Revision of the Admissions and Continued Occupancy Policy (ACOP) for Public Housing.

#### **PURPOSE/OBJECTIVE**

Huntsville Housing Authority (HHA), developed the Admissions and Continued Occupancy Policy (ACOP) for housing authority staff to follow in determining eligibility for admission and continued occupancy of public housing. The basic guidelines for this policy are governed by requirements of HUD (including recent 2021 guidance from HUD), with latitude for local policies and procedures. Notwithstanding the above, changes in applicable federal law or regulations shall supersede provisions in conflict with this policy.

Utilizing the Nan McKay-recommended language and recent guidance from HUD, HHA has revised the policies governing several aspects of public housing, including eligibility criteria for applicants, waiting lists, unit offers, earned income disallowance, re-examinations, security deposits, community service requirements, grievance and more. The full scope of the proposed revision is documented in the attachment to this Request for Board Action.

#### **JUSTIFICATION/DESCRIPTION**

HHA is required to adopt an Admissions and Continued Occupancy Policy (ACOP) for housing authority staff to follow in determining eligibility for admission and continued occupancy of public housing. This policy should be revised periodically to provide the latest regulatory and statutory changes, and to enact policies that encourage administrative efficiencies.

#### **ECONOMIC IMPACT**

None.

#### **ALTERNATIVES**

None.

#### **ATTACHMENTS**

The Summary of Proposed Changes 2022 ACOP for the Public Housing program.

**Huntsville Housing Authority**

**RECOMMENDATION**

The Executive Director/CEO recommends approval of the revised Admissions and Continued Occupancy Policy (ACOP) for the Public Housing program.

  
Antonio McGinnis, Sr.  
Executive Director/CEO

  
Terry Boyd  
Director of Public Housing Operations

Date: 12/14/21

Date: 12/14/2021

Action Taken: \_\_\_\_\_

## Summary of Proposed Changes

### 2022 ACOP (Admissions and Continued Occupancy Policy)

Pages	Section	Change
Title		New Approval Date: 1/1/2022
Table of content		Repaginated table for changes
1-12	1.III.C	Added website address and "hearings may be virtual "
2-3	2.I.B	Added to applicants' narrative "gender identity" to protected classes
2-15	2.III.D	Added to hearings narrative: "If family chooses to use a minor as an interpreter, HHA will not rely on the minor to serve as the interpreter for hearings of legal proceedings.
3-11	3.I.M	Added to ineligible family additions: "or is currently receiving a duplicate subsidy from another housing authority or housing program."
4-17	4.III.B	Added to waiting lists narrative: "Designated Housing Plans must be submitted to the HUD State office whenever there is a change and every five years."
4-21	4.III.D	Added to eligibility narrative: "This may be a remote interview via phone or computer."
8-2	8.I.B	Added to interview for applicants narrative: "This orientation may be by phone with the head of household (HOH). " Prior to leasing, the HOH will attend a lease orientation, at which time they will be provided with" :...(list of documents)
13-23	13.IV.D.	Changed length of time to respond to an eviction notice for non-payment of rent from 14 days to 30 days per Notice PIH 2021-29 issued October 7, 2021, "HHA will give written notice of 30 calendar days for nonpayment of rent."
14-18	14.III. H.	Added to hearsay evidence narrative for hearings: "unless there is a clear probative value and credibility of the evidence and the party seeking the change has met the burden of proof."

## **Huntsville Housing Authority**

### **ACT ON A RESOLUTION APPROVING REVISION OF THE ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP) FOR PUBLIC HOUSING**

#### **RESOLUTION NO. 2021-44**

WHEREAS, Huntsville Housing Authority (HHA), has an established Admissions and Continued Occupancy Policy (ACOP) that covers many aspects for administering public housing including admissions, occupancy, rents, and other administrative procedures; and

WHEREAS, The United States Department of Housing and Urban Development (HUD) periodically distributes directives for implementing changes to the ACOP; and

WHEREAS, HHA has made changes to its ACOP in order to comply with policies for the administration of public housing that have been mandated by HUD and are in accordance with industry standards;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Commissioners of Huntsville Housing Authority, hereby adopts the revised Admissions and Continued Occupancy Policy; and further resolves that the Executive Director/CEO is hereby directed to operate in accordance with the revised policy as adopted.

ADOPTED THIS 20<sup>th</sup> DAY OF DECEMBER 2021

SEAL

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Dr. Delmonize Smith, Chairman

Attest:

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Antonio McGinnis, Sr., Executive Director, CEO

**HUNTSVILLE HOUSING AUTHORITY**

**Board of Commissioners' Meeting  
Agenda Item  
Control Document**

**Date:** December 14, 2021

**HHA Staff Representative:** Turkessa Coleman-Lacey, Deputy Executive Director

**Department:** Executive

**Board of Commissioners' Meeting (Date):** December 20, 2021

**Board Agenda Item(s):**

1. Act on Resolution Authorizing the Execution and Submission of PHA Certifications of Compliance with the PHA Plan and Related Regulations Including Required Civil Rights Certification, Annual and Five-Year Budgets and FY 2022 Five Year and Annual PHA Plan.

**Date/Time/Place of Board of Commissioners' Meeting:** Monday, December 20, 2021, at 12:00 p.m.(virtual)

**Approved by:**  / 12/14/21  
Antonio McGinnis, Sr. Date  
Executive Director/CEO/Contracting Officer

**Department's Committee's Certification:**

We have reviewed the above-referenced Board of Commissioners' agenda items, together with the related and supportive documents, and have found them satisfactory. We further concur with the Staff's recommendation to place them on the approved, final agenda to be presented to the Board for appropriate action with respect to the adoption of the resolution(s) approving and/or authorizing the execution of the said action(s).

**HHA Board Committee Member:** Chairman Delmonize Smith, Ph.D. Date: 12/20/2021

**HHA Board Committee Member:** Vice-Chairman James Bolte Date: 12/20/2021

**HHA Staff Member:** Turkessa C. Lacey Date: 12-14-2021



# HUNTSVILLE HOUSING AUTHORITY

## REQUEST FOR BOARD ACTION

### ACT ON RESOLUTION AUTHORIZING EXECUTION & SUBMISSION OF PHA CERTIFICATIONS OF COMPLIANCE WITH THE PHA PLAN AND RELATED REGULATIONS INCLUDING REQUIRED CIVIL RIGHTS CERTIFICATION, ANNUAL & FIVE-YEAR BUDGETS, AND THE FY 2022 PHA FIVE-YEAR & ANNUAL PLAN

December 20, 2021

#### INTRODUCTION

The PHA Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals. The Five Year and Annual Plans are required to be submitted to the U.S. Department of Housing and Urban Development on a five year and annual basis respectively.

#### PURPOSE/OBJECTIVE

To obtain Board approval to submit the Five Year and Annual Plan for Fiscal Year beginning April 1, 2022, to the U.S. Department of Housing and Urban Development. This approval also includes the work activities identified in the FY2022 Annual Statement, as well as the 2022-2026 Five Year Action Plan, which will be submitted once funding is confirmed.

#### JUSTIFICATION/DESCRIPTION

Submission of the Annual and Five-Year Plans is required under 24 CFR 903. The purpose of the PHA plan is to provide a strategic planning framework for PHA management operations and capital planning with 1) local accountability; and 2) an easily identifiable source by which public housing residents, participants in the tenant-based assistance program, and other members of the public may locate basic PHA policies, rules and requirements concerning the PHA's operations, programs and services.

#### ALTERNATIVES

Not applicable.

#### RECOMMENDATION

Approval of the FY 2022 Huntsville Housing Authority Five Year and Annual Agency Plan including the execution of the PHA Certifications of Compliance with the PHA Plan and related regulations including the required civil rights certifications for submission to the U.S. Department of Housing and Urban Development and approval of annual and five-year budgets for submission once funding is confirmed.



Antonio McGinnis  
Executive Director/CEO

12/14/21  
Date



Turkessa Coleman Lacey,  
Deputy Executive Director

12-14-2022  
Date

ACTION TAKEN: \_\_\_\_\_

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed

Resolution 2021- 45

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

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).