



HOUSTON HOUSING AUTHORITY FY 2026

PART I: ANNUAL PHA PLAN & NARRATIVE ATTACHMENTS

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- ❖ Annual PHA Plan Narrative Attachments

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: Houston Housing Authority **PHA Code:** TX005
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2026
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 2,599 **Number of Housing Choice Vouchers (HCVs)** 18,397
Total Combined Units/Vouchers 20,996

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.

All required Annual PHA Plan materials are available for review at HHA's Central Office, located at 2640 Fountain View Drive Houston, and at public housing management offices. All materials are also available for review and download online at www.housingforhouston.com or upon written request.

☐ **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 B.1 Narrative.

(c) The PHA must submit its Deconcentration Policy for Field Office review.
See B.1 Narrative including 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.

See B.2 Narrative.

Progress Report.

B.3

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

See B.3 Narrative.

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.
See form HUD 50075.2 pending HUD approval.

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:

See B.5 narrative.

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.

C.2 Certification by State or Local Officials.

Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.

Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4 Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

(a) Did the public challenge any elements of the Plan?

Y N
☐ ☐

(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/hopec6/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 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. (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.

HOUSTON HOUSING AUTHORITY FY 2026 ANNUAL PHA PLAN

ATTACHMENT B.1 – REVISION OF PHA PLAN ELEMENTS

A. Statement of Housing Needs and Strategies

There continues to be a very high demand for affordable housing in Houston, which is exacerbated by limited supply and increasing rents. As of September 2025, HHA has 2,270 applicants on the Housing Choice Voucher program waitlist and 12,927 on the Public Housing program waitlist. Actual demand for affordable housing is much higher than that reflected in HHA's waiting lists. According to the City's draft Consolidated Plan for 2025-2029, almost 36% of all Houston households (n=315,140 households) are cost-burdened, paying over 30% of their household income for housing expenses. Approximately 18.3% of households (n=161,120) are cost-burdened and paying between 30%-50% of their household income for housing expenses, and approximately 17.5% of all households (n=154,020) are cost-burdened and paying over 50% of their household's income on housing expenses.

In addition to the need for more affordable, good quality housing units, seniors and persons with disabilities face significant challenges in finding accessible housing. Families with children face challenges securing good quality affordable housing in high opportunity areas with ready access to employment, educational, health care, supportive services and other needed services and amenities.

See also Consolidated Plan for additional citywide information on housing needs and strategies at www.houstontx.gov/housing/Consolidated-Plan-2025-Draft.pdf.

HHA's strategies to preserve and expand affordable housing in response to community needs are described in the Five Year PHA Plan and this Annual PHA Plan and MTW Supplement.

B. Deconcentration and Other Policies that Govern Eligibility, Selection and Admission

HHA's deconcentration of poverty policy is incorporated into the Public Housing Admissions and Continued Occupancy Policy (ACOP). The policy, which has not been modified since the previous submission to HUD, states:

Deconcentration: If at any time, one of HHA's properties has an average tenant income greater than 15 percent higher than the Authority-wide average income, extremely low and very low-income applicants will be targeted for admission until it is within 15 percent of the Authority-wide average income. This requirement neither requires nor permits the transfer of families to achieve deconcentration goals.

HHA periodically updates its Public Housing ACOP and HCV Administrative Plan to reflect evolving HUD requirements, MTW policies and/or other agency discretionary policies. As part of the FY 2026 PHA Annual Plan and MTW Supplement process, HHA has proposed modifications to both the ACOP and HCV Administrative Plan that became effective on January 1, 2026. The proposed revisions to the HCV Administrative Plan and Public Housing ACOP are included in the public comment materials published by HHA and are available on the HHA

website.

C. Financial Resources

The table below summarizes HHA’s preliminary, estimated FY 2026 financial resources to further its mission of providing quality affordable housing to eligible households. Actual funding amounts for FY 2026 are unknown as of the time of this Annual PHA Plan submission. Annual operating budgets for FY 2026 will be prepared during the fourth quarter of 2024 for approval by the HHA and affiliate Boards.

HHA FY 2026 Estimated Financial Resources

Source	Estimated Amount
MTW Funds	\$307,002,105.00
Mainstream Voucher Program	8,004,523.00
Mod Rehab Voucher Program	1,205,443.00
Emergency Housing Voucher Program	4,456,363.00
Resident Services/Self-Sufficiency	922,262.00
Jobs Plus Grant	460,000.00
TOTAL	\$322,050,696.00

As a designated MTW agency, HHA utilizes the financial flexibility permitted under MTW program.

D. Rent Determination

HHA’s policies related to rent determination including HUD-approved MTW waivers as applicable are included in the Public Housing ACOP and HCV Administrative Plan.

HHA has been designated an MTW agency by HUD as part of Cohort 2 of the MTW Expansion initiative. Under Cohort 2, HHA is participating in a national rent reform evaluation that will impact both the public housing and HCV programs. As part of the process for applying for MTW designation, HHA developed a proposed alternative MTW rent policy, conducted an extensive resident/community engagement process to review the policy and secured HHA Board of Commissioners approval.

Initial enrollment (and random assignment of eligible households) in the MTW rent reform evaluation study commenced in the second quarter of FY 2023 and was completed in FY 2024. As part of the implementation planning process, HHA has worked with HUD and its national evaluation team to review and finalize all applicable policies and processes related to MTW rent reform including, but not limited to, those related to selecting “control” and “treatment” groups for the evaluation.

E. Substantial Deviation, Significant Amendment or Modification

HHA has adopted the following criteria for determining a “substantial deviation” or “significant amendment or modification” to the 5-Year Plan or Annual PHA Plan, which shall include material changes to the following, except where such changes are required by Congressional action or HUD regulations:

- a. HHA plans or policies regarding demolition or disposition;
- b. HHA plans or policies regarding the Capital Fund financing program or mixed finance proposals
- c. Addition of non-emergency work items over \$500,000 that are not included in the current Annual Statement or Five-Year Action Plan);
- d. HHA plans or policies regarding designation of elderly or disabled housing; and/or
- e. HHA plans or policies regarding waiting list organization or to rent or admissions policies.

With respect to the Rental Assistance Demonstration (RAD) program, HHA defines substantial deviation from the Annual PHA Plan to exclude the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and,
- Changes to the financing structure for each approved RAD conversion.

HOUSTON HOUSING AUTHORITY FY 2026 ANNUAL PHA PLAN

ATTACHMENT B.2 – NEW ACTIVITIES

Soar 2034 is the strategic framework through which HHA will reposition the Public Housing portfolio and create new affordable housing in the City of Houston through the creation and expansion of public/private partnerships utilizing private capital. *Soar 2034* is the culmination of over two years of planning in which Public Housing properties have been thoroughly assessed by third party professionals including architects, engineers, appraisers and environmental consultants.

Houston's Public Housing portfolio has capital needs of over \$300 Million. Conversion tools provided by HUD will enable HHA to access private capital through public/private partnerships to reposition the public housing portfolio. HUD's Rental Assistance Demonstration (RAD) Program allows HHA to remove properties from the Public Housing Program and transition them to the Section 8 platform to assure continued affordability for residents. HHA will continue to utilize RAD along with other HUD conversion tools to reposition all public housing communities as further described below.

A. Choice Neighborhoods

Funding through HUD's Choice Neighborhoods program provides an opportunity to develop and implement comprehensive revitalization plans that address the needs of older HHA public housing developments, the neighborhoods in and around these developments, and the residents that live in public housing and the neighborhood. Choice Neighborhoods is a highly competitive grant program through which HUD provides Planning and Implementation grant funding in support of the program goals related to Housing, Neighborhood and People. HHA is currently implementing the following Choice Neighborhood grants:

- **Cuney Homes** – In July 2024, HUD awarded a \$50 million Choice Neighborhood Implementation (CNI) grant to HHA and the City to implement a comprehensive Transformation Plan for Cuney Homes and the Third Ward neighborhood. Brinshore Development as the Housing Lead and Urban Strategies as the People Lead on the project. Implementation activities will be ongoing in FY 2026.
- **Irvinton Village** – In September 2024, HUD awarded a \$500,000 Choice Neighborhood Planning Grant to HHA to develop a Transformation Plan for the Near Northside neighborhood and Irvinton Village in partnership with the City, LISC and Avenue CDC. The planning process, which is projected to occur over a thirty-month process, will be ongoing in FY 2026.

B. Mixed Finance/Modernization or Development

In FY 2026, HHA will continue an ambitious development and preservation initiative to revitalize and/or preserve affordability of the existing housing portfolio and to expand the availability of affordable housing units throughout the City. HHA will continue to collaborate with and may designate additional, qualified development partners and sites selected in accordance with HHA Board-approved procedures. In these efforts, HHA utilizes all available and appropriate funding/financing tools and strategies including Low Income Housing Tax Credits (LIHTC), Mixed Finance Development, Rental Assistance Demonstration (RAD) conversions, Choice Neighborhoods Grants, HUD Section 18 Dispositions, Project Based Vouchers (PBV), MTW

funding, Community Development Block Grant, FEMA and other sources.

HHA may utilize MTW funding and/or programmatic flexibility in its affordable housing preservation and development projects listed below, and may also acquire, rehabilitate or develop “Local, Non-Traditional” units as defined in the MTW Operations Notice, subject to applicable HUD approvals.

HHA may commit public housing operating reserves, including but not limited to the proceeds from the disposition of public housing properties, with HUD approval, under the Operating Fund Financing Program for eligible mixed finance development transactions or Replacement Housing Fund.

C. Demolition/Disposition

Section 18 refers to the regulations and process through which HUD authorizes Housing Authorities to dispose of and/or demolish public housing units. Disposition and/or demolition is oftentimes part of an overall strategy to redevelop or replace public housing units. HHA intends to submit a Section 18 demolition application for the properties listed below during the upcoming plan year. HHA intends to redevelop the sites of these properties following demolition.

- **Kelly Village** – HHA is currently negotiating with the Texas Department of Transportation to acquire Kelly Village for highway improvements at Fair Market Value.
- **Ewing** – HHA intends to submit a demo/dispo application for obsolescence for this site during the plan year. HHA will solicit a development partner to redevelop the site to include Project Based Vouchers to retain long-term affordability.

D. Designated Housing for Elderly and Disabled Families

The table below identifies public housing developments, or portions thereof, that HHA has continually operated as, has designated, or will apply for designation or renewal of designation in FY 2026 for occupancy by elderly and/or disabled families only. HHA intends to renew these designations subject to HUD approval.

Development Name	Designation Type	# Designated Units
Lyerly Senior Apartments	Elderly/Disabled	199
Bellerive Senior Apartments	Elderly/Disabled	210

E. Rental Assistance Demonstration Program

In FY 2026, HHA will continue and expand initiatives to ensure the long-term preservation of affordable housing by converting public housing developments to project-based assistance pursuant to HUD’s Rental Assistance Demonstration (RAD) program. Through RAD conversions, HHA can access additional private and/or other capital resources if needed to revitalize, redevelop and/or address capital needs while ensuring that existing residents’ right to return to the converted projects and other resident rights are protected.

In addition to converting existing public housing to project-based assistance, HHA may expand

affordable housing opportunities as feasible utilizing the “Faircloth to RAD” program established by HUD. “Faircloth authority” refers to a cap that Congress established in 1998 on the number of public housing units that the federal government would support. HHA currently has available Faircloth units for which HUD can provide rental assistance provided that HHA can finance the acquisition or initial construction costs.

In converting public housing developments, HHA may utilize a blend of RAD program authority and Section 18 disposition authority to the extent allowable under the HUD RAD Notice, HUD PIH Notice 2018-04 and/or successor notices or other relevant HUD regulations and guidance. HHA may also utilize MTW funding and/or programmatic flexibility as allowed under the RAD Notice and/or the MTW Operations Notice.

To date, HHA has successfully converted the following public housing sites to PBV under the RAD program: HRI/Victory, Allen Parkway Village, Historic Oaks at Allen Parkway Village and Sweetwater Point Apartments.

HHA intends to submit applications under the RAD Program for the properties listed below. It is anticipated that all properties will be processed under the RAD/Section 18 blend provisions.

- Bellerive
- Lyery
- Kennedy
- Lincoln Park
- Fulton Village
- Oxford Place
- Heatherbrook
- Independence Heights I

Other Development Activities

- **Sweetwater** – This property was previously converted under RAD. HHA will submit a post-closing request to finalize refinancing of this project and add additional PBVs to support the project in the upcoming plan year. MTW funding will be utilized to support the project.
- **Victory/HRI** – This property was previously converted under RAD. HHA will submit a post-closing request to add additional PBVs to improve financial performance of the property. MTW funding will be utilized to support the project.
- **APV/HOAPV** – This property was converted under RAD and continues in construction. MTW funding will be utilized to meet construction shortfalls.

HHA may also apply for RAD conversions during FY 2026 or future periods for additional developments. HHA will follow all required resident notification, public participation and other applicable requirements as part of future conversions. See also Section H. below for additional required RAD provisions.

F. Project-Based Vouchers

HHA operates a Project-Based Voucher (PBV) program in accordance with HUD regulations

and HHA policies as defined in the HCV Administrative Plan. Project-basing is consistent with HHA’s Annual Plan and 5-Year Plan as it both supports the repositioning and preservation of existing public housing units (through RAD and/or Section 18 conversions) and expands the range of housing opportunities available to voucher holders throughout the City. HHA intends to continue to implement allowable PBV waivers as approved by HUD in prior MTW Supplements to improve program efficiency, streamline administration and support expansion of affordable housing opportunities. In previous MTW Supplements, HUD approved HHA’s requests for waivers that: increase the PBV program cap; increase PBV project cap; allow for non-competitive selection of PHA-owned units without improvement, development or replacement; and, eliminate the requirements for a third party to conduct inspections and rent reasonableness determinations on HHA-owned or controlled PBV units.

As part of planned RAD conversions, HHA projects that it will enter into PBV Housing Assistance Payments (HAP) contracts in FY 2026 or beyond for additional public housing developments as referenced above in the “Rental Assistance Demonstration Program” narrative. In addition to supporting RAD conversions, HHA periodically issues Requests for Proposals (RFP) or other solicitations for PBV developments. HHA's PBV program focuses on supporting and expanding Permanent Supportive Housing (PSH) and other housing options for low-income families. For this reason, HHA encourages the development of new housing units and/or the rehabilitation of existing housing to increase the supply of affordable accessible housing for this particular population.

The following table provides a listing of current PBV projects as of FY 2025:

PROPERTY	PBV UNITS	HAP EFFECTIVE DATE	HAP EXPIRATION DATE
Women's Home Jacquelyn-Cizik (1839 Jacquelyn Dr HTX 77055)	50	1/1/2012	12/31/2027
New Hope @Brays Crossing (6311 Gulf Frwy HTX 77023)	36	09/18/13	09/17/28
New Hope @Sakowitz (2424 Sakowitc HTX 77020)	41	09/18/13	09/17/28
Travis Street Plaza (4500 Travis St HTX 77002)(VASH PBV)	62	10/01/13	09/30/28
New Hope @Congress (1414 Congress St HTX 77002)	52	07/01/14	06/30/29
New Hope @Rittenhouse SRO (577 Rittenhouse HTX 77002)	40	07/03/14	07/02/29
New Hope @Canal Street Apts (2821 Canal St HTX 77003)	31	10/01/14	09/30/29
New Hope @Perry SRO (4415 Perry St HTX 77021)	39	10/01/14	09/30/29
Family Place (7625 Hammerly Blvd HTX 77055)	40	11/28/16	11/27/31
New Hope @Harrisburg (3315 Harrisburg HTX 77003)	160	03/19/18	03/18/33
HRI Victory (15 Bailey St. HTX 77019)	140	10/01/20	09/30/40
Winrock Apts South (Briarwest) (1950 Winrock Blvd HTX 77057)	32	01/15/21	01/14/36
New Hope @Dale Carnegie (6015 Dale Carnegie HTX 77036)	100	04/06/21	04/05/36
New Hope @Reed Rd (2605 Reed Rd HTX 77051)	163	04/15/21	04/14/36

PROPERTY	PBV UNITS	HAP EFFECTIVE DATE	HAP EXPIRATION DATE
1300 N Post Oak (1300 N Post Oak Rd HTX 77055)	7	05/11/21	05/10/36
Post Oak Lofts (1255 N Post Oak Rd HTX 77055)	14	08/30/21	07/31/36
Allen Parkway Village (1600 Allen Parkway Village HTX 77019)	167	09/01/22	08/31/42
HO Allen Parkway Village (1600 Allen Parkway Village HTX 77019)	89	09/01/22	08/31/42
Sweetwater Point (7909 S. Sam Houston Pkwy. E. HTX 77075)	26	10/01/22	09/30/42
Citadel @Elgin (3331 Elgin St HTX 77004)	18	10/18/23	10/17/37
Sunrise Lofts/ Tejano Center (3103 McKinney St HTX 77003)	89	11/02/23	11/01/38
Rasmus Temenos Apartments SRO (1703 Gray St HTX 77003)	95	01/30/24	01/29/39
2100 Memorial (2100 Memorial Dr HTX 77007)	39	07/01/24	06/30/39
Standard at Jensen (91 Jensen Dr. HTX 77020)	85	12/1/2024	11/30/2039
Magnificat SRO (3300 Caroline St HTX 77004)	149	05/01/25	04/30/40
New Hope Gray (2604 Gray Street, HTX 77004)	67	8/1/2025	7/31/2040
TOTAL PBV UNDER CONTRACT	1,831		

In addition to planned RAD conversions and new developments that may be selected through RFPs issued in FY 2026, as of September 2025, HHA plans to enter into new PBV HAP contracts later in FY 2025 or in FY 2026-27 for projects shown on the following table. Due to variations in development timetables, regulatory approvals and other factors, projects appearing in this listing may appear in prior or future Annual Plans pending execution of a PBV HAP Contract:

PROPERTY	PBV UNITS	ESTIMATED EFFECTIVE DATE
AWARDED UNITS		
Boulevard 61 Apartments (6101 Richmond Ave HTX 77057)	25	4/1/2027
Campanile on Minimax (2727 Minimax St HTX 77008)	31	11/1/2025
Knowles-Rowland House (2019 Crawford St HTX 77003)	31	3/1/2026
Manson Place (3502 Reeves St HTX 77002)	66	3/1/2026
The Pointe at Bayou Bend (800 Middle St HTX 77003)	95	3/1/2026
OBLIGATED UNITS		
New Hope@Berry (8855 McGallion Rd HTX 77022)	27	2/1/2026
Independence Heights II	131	7/1/2027
Trinity East	81	12/1/2027
PROPOSED UNITS		
Mansions at Turkey Creek	51	1/1/2026
Sweetwater	100	1/1/2027

Overall, including PBV projects under a HAP contract as of FYE 2025 and planned PBV projects for FY 2026-27, HHA projects that approximately 2,469 units will be under a PBV contract at 36 developments located throughout the City. Projected new PBV HAP contracts may be modified over the course of the fiscal year. In FY 2026, HHA may undertake additional PBV competitive solicitations and/or to select additional non-competitive PBVs in accordance with HUD regulations and HHA policy and to award PBV HAP contracts to qualified developments that expand housing opportunities including, but not limited to, permanent supportive housing, housing for transition-age youth, and housing in high opportunity areas.

Pursuant to its MTW flexibility, HHA will attach PBVs to projects in which HHA has an ownership interest or has control of, without following a competitive process, in cases where HHA is engaged in an initiative to improve, develop, or replace a public housing property or site.

G. Other Capital Grant Programs

HHA's existing public housing portfolio requires continuous investment, and there is a backlog of unfunded capital needs. The planned redevelopment and RAD conversion activities referenced above are intended to address some of these needs and to ensure the long-term preservation of affordable housing. In addition to these activities, HHA will review all available HUD Capital Grant program funding opportunities - including, but not limited to, the Lead Based Paint Capital Fund Program, the Housing-related Hazard Capital Fund Program, Emergency Safety and Security Grant - and submit applications where feasible and appropriate in FY 2026.

H. Additional RAD Annual Plan Provisions

As noted above, HHA intends to submit applications to convert various Public Housing communities to the PBV program, pursuant to the RAD guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to PBVs, HHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-23, REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are excerpted from HUD's Notice and described below. Additionally, HHA certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing Housing Authorities with access to private sources of capital to repair and preserve its affordable housing assets. Upon conversion, HHA's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that HHA may also borrow fund to address their capital needs. HHA will also contribute Replacement Housing Factor (RHF) funds and Public Housing Reserve funds in the amount of approximately \$3 million dollars.

Significant Amendment Definition:

As part of RAD, HHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional

Capital Funds;

- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and,
- Changes to the financing structure for each approved RAD conversion.

Units to Be Converted Under RAD:

Units to be converted under the RAD program are identified above in Section E. The planned RAD conversions will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. Changes in bedroom distribution will be made to accommodate actual needs of all current residents assuring that all households can be rightsized.
3. Most properties will utilize a RAD/Section 18 Blend to maximize potential revenue to reach the necessary rehab level.
4. There will be transfer of assistance under the RAD conversion.

RAD Resident Rights and Participation

1. No Re-screening of Tenants upon Conversion. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept HHA's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24

CFR § 983.3 (definition of “total tenant payment” (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058. Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Please Note: Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants’ contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant’s failure to comply with the contract of participation. Consequently, 24 CFR984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Participants assisted by ROSS-SCs must be RAD-PBV residents. RAD PBV residents must live in a former public housing project that converted under the RAD program and was previously served by a ROSS-SC to be considered as an eligible participant. ROSS-SCs may not serve non-RAD PBV residents.

6. Resident Participation and Funding. In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA’s Section 8 Administrative Plan.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived.

The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.,) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program

evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. Additional Monitoring Requirement. The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968

(Section 3). Under existing PBV program rules, projects that qualify as "existing housing" under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as "existing housing." Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants,

PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the

public housing waiting list must be conducted accordance with the requirements for effective ~~communication with persons with disabilities~~ at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. Mandatory Insurance Coverage. The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. Agreement Waiver. For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. Future Refinancing. Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

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ATTACHMENT B.3 – PROGRESS REPORT

The following is a summary report on HHA’s progress in advancing the goals detailed in the 5-Year Plan for 2025-2029. Given that this document is published in September 2025, this progress report covers only a portion of FY 2025. During this period, HHA has continued to implement a broad array of initiatives to preserve and expand the affordable housing portfolio; provide rental assistance and services to more than 18,000 households; help connect residents to jobs, job training, health care and other services; and, improve agency operations and customer service delivery. The following is an updated listing of HHA goals and objectives:

Goal	Objectives
Strengthen HHA's internal capacity	<ul style="list-style-type: none"> • Improve performance on PHAS Indicators • Achieve high performer status • Strengthen case management to assist more families in moving towards self-sufficiency • Improve utilization of program funding resources including grants • Improve tracking and controls over vacancies and damages • Strengthen staff leadership and other skills and expand opportunities for growth through expanded internal cross-training and partnership with NMA
Create a development plan to reposition aging housing stock and increase production of affordable housing for low-income households	<ul style="list-style-type: none"> • Implement SOAR 2034 plan to expand affordable housing and reposition public housing to Section 8 voucher program platform
Promote homeownership and self-sufficiency	<ul style="list-style-type: none"> • Expand homeownership opportunities through MTW including homeownership education, downpayment assistance and other initiatives • Expand and enhance economic opportunities for residents including workforce training and upskilling • Establish additional incentives for Family Self Sufficiency program clients • Create new partnerships through Resident Services for mental health, financial literacy, self-sufficiency, housekeeping and other area

Goal	Objectives
Advance sustainable external relationships and collaboration	<ul style="list-style-type: none"> • Collaborate with HCV landlords to create a landlord advisory group • Expand engagement with and training for HCV landlords and tenants including evaluating mandatory training • Enhance partnerships through Resident Services Department • Strengthen relationships with Houston Police Department and Precinct 6 • Improve public safety in HHA communities by focusing on community policing, engaging youth with law enforcement, enhanced summer program for youth and other initiatives
Create a positive brand image and customer experience	<ul style="list-style-type: none"> • Implement enhanced compliance training related to HUD programs • Implement fair housing training and education for HCV program participants and landlords • Continue to enhance website and expand online functionality • Complete regular recertifications on a timely basis • Increase landlord participation in HCV program through education, leasing and other incentives

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ATTACHMENT B.5 – AUDIT

Houston Housing Authority’s Fiscal Year 2023 audit was completed by independent auditors, Berman Hopkins CPAs & Associates, LLP. The audit report, which was subsequently submitted to HUD, includes a Schedule of Findings and Questioned Costs that identified a number of material weaknesses in internal controls and non-compliance findings. On December 28, 2024, HHA developed and submitted to HUD a Corrective Action Plan that addresses all findings.