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

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

**Definitions.**

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

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### A. PHA Information.

<table>
<thead>
<tr>
<th>PHA Name: Metropolitan Development and Housing Agency</th>
<th>PHA Code: TN 005</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHA Type: <strong>High Performer</strong></td>
<td></td>
</tr>
<tr>
<td>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2220</td>
<td></td>
</tr>
<tr>
<td>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</td>
<td></td>
</tr>
<tr>
<td>Number of Public Housing (PH) Units: 75</td>
<td>Number of Housing Choice Vouchers (HCVs): 7388</td>
</tr>
<tr>
<td>Total Combined: 7463</td>
<td></td>
</tr>
<tr>
<td>PHA Plan Submission Type: Annual Submission</td>
<td>Revised Annual Submission</td>
</tr>
</tbody>
</table>

**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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

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

<table>
<thead>
<tr>
<th>Participating PHAs</th>
<th>PHA Code</th>
<th>Program(s) in the Consortia</th>
<th>Program(s) not in the Consortia</th>
<th>No. of Units in Each Program</th>
</tr>
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<tbody>
<tr>
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<td>PH</td>
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<tr>
<td>Lead PHA:</td>
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B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?

Y  N
☐  ☑ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☐  ☑ Financial Resources.
☐  ☑ Rent Determination.
☐  ☑ Homeownership Programs.
☐  ☑ Safety and Crime Prevention.
☐  ☑ Pet Policy.
☐  ☑ Substantial Deviation.
☐  ☑ Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

The Agency’s policy is to promote the development of rent-subsidized housing units in mixed-income communities located in areas where residents of all income ranges will have access to community amenities. In compliance with HUD’s requirement to affirmatively further fair housing, MDHA will continue developing mixed-income properties consisting of market (120% AMI and above), workforce (80%-120%), and low-income (below 80%) units. These properties will include the same amenities and bedroom size options for all residents regardless of income range (probably more of the larger bedroom-size units for low-income households to meet the needs of current residential households). MDHA limits developments that are entirely low-income to properties being built for special populations with wrap-around social services, and even when the agency develops such properties, it ensures they are located in areas of opportunity or areas experiencing significant revitalization through public and/or private investment.

The Agency continues to implement its policy to promote the de-concentration of poverty through the recapitalization and transformation of its largest former public housing site through its Envision Cayce Plan. In program year 2021, as part of this plan, MDHA completed construction on Red Oak Flats (102-unit apartment building, 44% which are set aside for rent-subsidized residents currently residing at Cayce Place, with the remaining consisting of a mix of workforce and market-rate residents) and Red Oak Townhomes (44 units, of which 25 were set aside for Cayce Place residents). HUD’s Office of Fair Housing & Equal Opportunity had already approved the Site and Neighborhood Review for both developments. In 2022, MDHA will have initiated construction on another mixed-income development (Boscobel IV, which will be known as Cherry Oak Apartments) and will have applied for Low Income Housing Tax Credit (LIHTC) financing for another project (either 5th and Summer or Boscobel V and VI). Additionally, MDHA recently completed another development (outside of the Cayce location) that will promote the de-concentration of poverty: Randee Rogers Apartments, a 100-unit mixed-income development (50% utilizing Faircloth allocated subsidies) located in a Census Tract which has experienced rapidly rising income levels over the last decade and contains multiple community services, including a large grocery store adjacent to the development has just been completed and occupied. Also, it will continue collaborating with the Metropolitan Nashville government in developing a “permanent supportive housing development” for individuals experiencing homelessness, with a site identified in downtown Nashville. The plans are to include wrap-
around services as part of the development. MDHA’s involvement might include administering Section 8 Project-Based Vouchers (possibly Faircloth converted units) but not ownership or management of the facility.

(c) If the PHA answered yes for any element, describe the revisions for each element below:
For the Admission policy for public housing units, MDHA established a preference for residents of adjacent MDHA PBRA properties for the waiting lists of Randee Rogers Apartments and Red Oak Townhomes. This is intended to facilitate the quick lease-up of LIHTC-eligible applicants into the LIHTC units once the units become available for occupancy.

Rental Assistance is amending its HCV Administrative Plan to incorporate special provisions related to the Emergency Housing Voucher (EHV) program and the Community Choice Demonstration (CCD) program. For EHV, these include alternative provisions related to eligibility, screening, income verification, verification of social security numbers, citizenship and use of service fees associated with EHV. For the CCD program, amendments to the Administrative Plan are related to adequate payment standards for the defined opportunity areas, adequate search time, expedited inspections and lease-ups, and adding a waiting list preference for families with at least one child aged 13 years old or under that live in a census tract with a poverty rate of 30 percent or higher.

B.2 New Activities.

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

Y N ☒ Hope VI or Choice Neighborhoods.
☒ ☐ Mixed Finance Modernization or Development.
☒ ☐ Demolition and/or Disposition.
☒ ☒ Conversion of Public Housing to Tenant Based Assistance.
☒ ☒ Conversion of Public Housing to Project-Based Assistance under RAD.
☒ ☒ 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 current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

HOPE VI or Choice Neighborhoods
Although in the initial concept and eligibility inquiry phase, MDHA is considering applying for a CNI grant to assist in the recapitalization of its CWA Apartments, Project Based Rental Assistance (PBRA) properties that it purchased in 2014. We believe that these properties may be eligible for CNI even though they are not (and have not been previously) public housing units. In addition to the grant funding that would come directly from HUD for the revitalization of this portion of the Envision Cayce neighborhood, the CNI designation would make the proposed activities eligible under the Choice Neighborhood’s set-aside in the Tennessee Housing Development Agency’s Qualified Allocation Plan (“THDA’s QAP”) for 9% Low Income Housing Tax Credits.

Mixed Finance Development and Demolition
MDHA intends to continue replacing its legacy family housing with new mixed-income housing developed with combinations of Low Income Housing Tax Credits, Community Investment Tax Credit (CITC) and market-rate bank loans, HOME grants, state and federal Housing Trust Fund grants, Federally Insured multi-family loans, low-interest loans from the Amazon Corporation, private donations, and MDHA equity. Most of such development will occur on properties which
were formerly public housing but which had been converted to PBRA through HUD’s Rental Assistance Demonstration program. Implementation of this strategy will necessarily involve the demolition of existing residential buildings, although these are no longer “public housing” and will not require HUD approval under Section 18.

The Agency is also exploring a strategy to develop in-fill housing on currently vacant properties that it owns or on properties that may be conveyed to it by other public agencies.

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

Upon completion of construction and stabilization of some of the new mixed-income housing as described in the previous paragraph, the affordable units of which will be developed as public housing under remaining eligibility of the Faircloth Amendment, MDHA will apply to have these units converted thru RAD to Project-Based Rental Assistance. Specific projects currently eligible for RAD conversion include Randee Rogers Apartments (which has 50 units eligible for PBRA conversion) and Red Oak Townhomes (which has 25 such units). There may be additional projects utilizing our Faircloth authority initiated during future years.

While the conversion of rental subsidies for all legacy public housing properties through RAD has been completed, the anticipated recapitalization of several properties remains as a focus for the Agency. Some of such planning has been undertaken at Napier Place/Sudekum Apartments; further planning and financial structuring will need to be move such plans into implementation. Community planning also needs to be implemented for the Andrew Jackson Courts community.

**Project Based Vouchers**

The MDHA Board of Commissioners has previously authorized up to 1,400 of its allocation of Housing Choice Vouchers to be converted to Project Based. The Agency had issued a Request for Proposals for 900 of these units. With the approval of a proposal called Shelby House in 2021, virtually all of this 900-unit allocation will have been utilized. At this time, there is no plan to increase the Project-Based utilization beyond the current 900 units. However, the Board wishes to leave this option available should circumstances change and an additional utilization seem prudent.

**Faircloth to Project Based Vouchers**

As a new strategy to expand the supply of affordable housing in Nashville, MDHA is proposing to use approximately 600 to 800 units of its Faircloth Amendment authority to develop new units which would be converted through the RAD process to Project Based Vouchers. Such units would likely be developed and financed by private partners (whether for-profit or non-profit developers), with MDHA assisting through the rental subsidies for the tenants.

**B.3 Progress Report.**

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

**Goal #1: Increase the Supply of MDHA-Owned Housing**

- Objective 1a: Utilize remaining capacity (approximately 1,000 units) under the Faircloth Amendment to increase the number of public housing units (which will later be converted to Project-Based Rental Assistance).
In December of 2019, MDHA closed on the debt financing of a new apartment complex called Randee Rogers Apartments; of the 100 units in this complex, 50 were built as public housing under the Faircloth Amendment and will be converted through RAD to PBRA.

MDHA also completed construction on 44 units, known as Red Oak Townhomes; 25 of these units were built as public housing under the Faircloth Amendment and will be converted to PBRA.

- Objective 1b: Utilize various forms of financial assistance (grants, loans, contributions, MDHA equity, etc.) to construct workforce and market-rate housing in conjunction with subsidized housing being developed so as to deconcentrate poverty.

MDHA has several mixed-income housing properties completed or under development, each using some combination of LIHTC, CITC and regular bank loans, HOME funds, state and federal housing trust fund grants, and MDHA cash equity. These include:

- **Boscobel I** (Mosley on Sixth), with 96 units (50 affordable and 46 workforce and market-rate), began occupancy in January of 2020, financed with LIHTC, National Housing Trust Fund, CITC and market-rate bank loans, and MDHA equity; it is now fully occupied and has reached stabilization.

- **Boscobel II** (Manning Place), with 101 units (45 affordable and 56 workforce and market-rate), financed with the same tools as Boscobel I and also with HOME and Community Development Block Grant funds; it is also fully occupied and has reached stabilization.

- **Boscobel III** (Red Oak Flats), with 102 units (45 affordable and 57 workforce and market-rate), has completed construction and was financed with the same tools as Boscobel II.

- **Boscobel IV** (Cherry Oak Apartments), with 96 units (45 affordable and 51 workforce and market-rate) has received an allocation of LIHTC funding; financing closed and construction commenced in the Spring of 2022.

- **Randee Rogers** with 100 units (50 affordable and 50 workforce and market-rate) was completed during the Spring of 2022; it was financed by 4% LIHTC, multi-family bonds, Public Housing Capital Funds, and Capital Spending Plan (CSP) funds from the Metropolitan Government.

- **And Red Oak Townhomes** (44 units, with 25 affordable and 19 workforce and market-rate) had construction completed, being financed with CSP funds from the Metropolitan Government and a CITC bank loan.

**Goal #2: Increase and Improve the Supply of and Access to Housing Choice Vouchers**
Objective 2a: Apply for replacement vouchers that become available as owners opt-out of Section 8 project-based assistance or any other voucher assistance that is made available and is suitable for MDHA.

MDHA received 17 Mainstream Vouchers under Cares Act funding effective 6/1 2020, 44 additional VASH vouchers effective 2/1/2021, 100 Mainstream vouchers effective 3/2/2021, 198 Emergency Housing Vouchers effective 7/1/2021, and 55 Family Unification Vouchers effective 8/1/2021.

On April 30th, 2021, the U.S. Department of Housing & Urban Development (HUD) announced MDHA as one of nine public housing agencies (PHAs) across the country selected as a lead agency for HUD’s first Mobility Demonstration Voucher grant program. MDHA will receive $4,984,654 over 6 years to assist families with children using housing choice vouchers to overcome barriers often encountered in their housing search and provide them with the opportunity to move to low-poverty, high-opportunity census tracts. MDHA plans to launch the program in April/May 2022.

Objective 2b: maximize utilization by maintaining a utilization rate of at least 99% annually.

Utilization rate for the year ended 9/30/21 was 89% due to the per-unit per-month funding from HUD being lower than our HAP payments. Our per unit costs continue to increase as rents continue to rise in the Nashville market; we did utilize 100% of the HUD funding provided.

Objective 2c: Conduct at least three landlord meetings per year.

Due to COVID, no meetings were held in 2021. We have had some discussions on holding virtual meetings. We did create an electronic version of our landlord packet for new landlords, with many forms in fillable format. This packet, the Landlord Briefing PowerPoint presentation and other detailed information is posted on the agency’s website. We plan to restart the landlord meetings in 2022. We have been actively participating in the landlord outreach committee through the Metro Homeless Impact Division and their Low Barrier Housing Collective (LBHC) launched February 1, 2022.

Objective 2d: Attract at least 40 new property owners to the Housing Choice Voucher program each year.

96 new landlords were added in 2021.

Objective 2e: Increase the percentage of vouchers leased in non-impacted census tracts from 69% to 72%.

For 2021, the percentage remained at 69%.

Objective 2f: Have at least three Housing Choice Voucher clients graduate to homeownership each year.

Unfortunately, no HCV participants purchased homes in 2021. We had at least three FSS program graduates who intended to use their FSS escrow to purchase a home, but were not successful due to being outbid by other buyers.
Objective 2g: Explore ways to fund and expand landlord incentive program for VASH participants to apply to other program participants

No additional funding was identified that would allow us to expand program. The Metro Government’s funding for this program expired 6/30/20 and was eliminated from the Metro Government’s FY20-21 budget. We are seeking alternative funding to allow the current program to continue. There are discussions regarding landlord incentives within the landlord engagement committee headed by Metro Homeless Impact Division, and the Mayor’s Affordable Housing Task Force Committee meetings. MDHA has staff on both committees. On 2/1/2022, the LBHC launched an incentive program for landlords participating in the LBHC who rent to any family assisted through the coordinated entry system managed by the Metro Homeless Impact Division, and includes VASH families.

Objective 2h: Maintain a SEMAP score of 97 or higher.

SEMAP score for 2020-2021 was 100.

Objective 2i: In Rental Assistance, conduct staff meetings addressing quality control issues at least quarterly.

Staff meetings are held at least quarterly. Since March of 2020, our department has held a weekly teleconference staff meeting nearly every week. Staff meetings are now being held bi-weekly, with a bi-weekly supervisory staff meeting as well.

Objective 2j: Conduct a Housing Choice Voucher program participant survey biennially.

We did not conduct a survey in 2021 as planned.

Objective 2k: Increase the project-based voucher PBV program cap from the currently Board-approved 900.

The MDHA Board approved an increase in the cap to 1400 in April 2019. However, we have not issued a new Request for Proposals to expand the PBV program beyond the original 900.

Goal #3: Sustain Viable Communities and the Urban Core

Objective 3a: Increase and maintain the number of Family Self-Sufficiency (FSS) Voucher households to 150 participants.

The FSS program began the year with 136 participants and currently has 128 participants. 25 FSS participants completed their Contract of Participation in 2021.

Objective 3b: Establish 3 new partnerships annually with agencies that promote aspects of FSS (homeownership, budget management, career development, job training and readiness, etc..)

In late 2019, MDHA received a HUD EnVision Center designation and began work to launch a one-stop-shop that emerged from a Choice Neighborhoods Planning grant in the Napier Place and Sudkeum Apartments communities. Known as the Napier and Sudekum Envision Center, this site will provide transformational programming with a mission to eliminate barriers to accessing services, employ navigators to evaluate resident needs and facilitate coordination across multiple partners and facilitate successful pathways to economic self-sufficiency. Examples of services to be provided through the Envision Center include HUD-certified homebuyer and financial literacy education, on-site Vocational
Rehab counselors providing career development services for individuals with disabilities and a satellite American Job Center office that provides Title 1 workforce development services and Title 2 adult education services.

In preparing for the launch of the HCV Mobility Demonstration program, now known as the Community Choice Demonstration (CCD) program, MDHA Rental Assistance staff will connect CCD program participants with the MDHA Envision Center staff to provide the mobility-related services obtained commitments from 5 organizations to provide services, including job training and employment navigation.

- Objective 3c: Working with new and existing partners, provide at least 4 sessions annually that focus on job training, job readiness, and employability.

The Rental Assistance Department continued participation in programs through Christian Community Services Incorporated (CCSI), Woodbine Community Organization, Neighborhood Assistance Corporation of America (NACA), TN Reconnect, Affordable Housing Resources, Nashville Career Advancement Center (NCAC), Martha O’Bryan Center, and the Metro Action Commission. We continue to promote the ongoing training classes through Goodwill Career Solutions program. FSS staff provide private sessions on job readiness and employability before referring participants to existing partners.

Goal #4: Pursue the Best Housing and Business Practices

- Objective 4a: Improve the quality and capability of Agency staff in all areas. In the first year, identify specific training needs for staff and develop a training schedule for the remaining 4 years for the department.

- MDHA has identified the need to provide training to the property management staff in the following areas:
  - Applications and eligibility
  - Customer service
  - Marketing and resident retention
  - Recertification
  - Voucher processing
  - Fair Housing and reasonable accommodation
  - Basic plumbing, HVAC, and electrical maintenance
  - Vacancy make ready and inspections
  - Manager and supervisory training

- All newly hired Property Management and Rental Assistance employees attended essential leasing and voucher training.
- Property leasing staff completes a two-week Instructor-led training course on property management and additional online learning with Grace Hill.
- Rental Assistance staff completed instructor-led training and online training with The Nelrod Company.
- The agency provided certification training for the leasing staff to become certified occupancy and tax credit specialists.
- All of the Agency’s managers and supervisors completed essential leadership training in 2021.
- Maintenance technicians attended monthly in-person skills training. This training included: Basic plumbing, electrical, vacancy make ready, appliance and HVAC. 24 staff members completed the monthly training.
- Maintenance supervisors and senior maintenance technicians attended training on gas maintenance, doors, drywall installation, and repairs.
- The Affordable Housing property staff continue to use the Grace Hill LMS with 532 completed training hours.
- Other training included: All Rental Assistance staff completed Cyber Awareness Training in 2021. In January 2022 all staff attended the TN Fair Housing Council Community training. Six specialists completed Nan McKay HCV Specialist course and one FSS specialist completed Nan McKay FSS Coordinator course.
- Objective 4b: Integrate programs and staff from other Agency departments in housing initiatives, including RAD and Envision Cayce

  During the past year, the Community Development Department assisted with our Envision initiatives by:
  - Providing HOME funds to leverage LIHTC funding for Boscobel IV
  - Providing CDBG funding for infrastructure improvements (water, sewer and sidewalks) also in support of Boscobel IV.
  - Providing CDBG funds to offer rental counseling services to MDHA residents through a HUD Certified Housing Counseling agency.
  - Providing CDBG funds to support employment services connecting MDHA residents to jobs associated with the Agency’s redevelopment initiatives.

- Objective 4c: Apply for Moving to Work designation should the opportunity arise. There was an MTW Cohort opportunity, but was determined not to be a good fit for MDHA, so we did not apply
- Objective 4d: Seek ways to further automate processes, digitalize forms and files.

  Many forms and processes have been automated. Several HUD forms and other program forms are now posted on the Agency’s website, and in response to COVID-19, we have implemented electronic means for families to report changes. For our HCV program, we have transitioned to allowing families to apply, complete re-examinations, and upload required documents online utilizing the Rent Café Resident Recert Portal. Applicants and participating families can complete their eligibility paperwork and submit their documentation entirely through this portal. However, we still have many families who...
prefer to submit paper documentation or who do not have internet access. For our PBRA program, we have begun preparing to transition our forms, files, applications, recerts, and other resident documents to digitized forms and files, likewise planning to utilize Rent Cafe software for our digital recordkeeping.

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<thead>
<tr>
<th>Duri ng</th>
<th>Most Recent Fiscal Year Audit.</th>
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<tr>
<td>(a) Were there any findings in the most recent FY Audit? The audit for the year ended September 30, 2021 was completed.</td>
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<tr>
<td>Y</td>
<td>N</td>
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<tr>
<td>(c) If yes, please describe:</td>
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| Other Document and/or Certification Requirements. |
|---|---|
| C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan |
| Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. |
| C.2 Civil Rights Certification. |
| Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. |
| C.3 Resident Advisory Board (RAB) Comments. |
| (a) Did the RAB(s) provide comments to the PHA Plan? |
| Y    | N    |
| ☒    |      |
| 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.4 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. |
| D Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP). |
| D.1 Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. The current Five Year Plan was approved by HUD on September 26, 2019. It called for CFP funding to be used for assisting with the development of Faircloth Amendment units which were constructed as Randee Rogers Apartments, described above in Section B.3 under Objective 1(a). |