THE HOUSING AUTHORITY
OF THE CITY OF FORT MYERS, FLORIDA

# Annual Plan

## Fiscal Year 2027 - 2028

Marcia Davis, Executive Director
November
2026

THE HOUSING AUTHORITY
OF THE CITY OF FORT MYERS, FLORIDA

City of Palms

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

**A.1**

**PHA Name**:
**HOUSING AUTHORITY of the CITY of FORT MYERS** PHA **Code**: **FL047**
**PHA Type:** ☒ Standard PHA ☐ Troubled PHA

**PHA Plan for Fiscal Year Beginning**: (MM/YYYY): **04/2027**
**PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
**Number of Public Housing (PH) Units** **314** **Number of Housing Choice Vouchers (HCVs)** **2999**
**Total Combined Units/Vouchers** **3313**
**PHA Plan Submission Type:** ☒ Annual Submission ☐ Revised Annual Submission

**Availability of Information.** PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

**PHA Plan, PHA Plan Elements, and Public Hearing Information can be found at the following locations:**

1) Housing Authority Administrative Office, 4224 Renaissance Preserve Way Fort Myers, FL 33916

**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. | Annual Plan Elements |
|---|---|
| B.1 | **Revision of PHA Plan Elements.**<br><br>(a) Have the following PHA Plan elements been revised by the PHA?<br><br>Y N<br>☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs<br>☐ ☒ Deconcentrating and Other Policies that Govern Eligibility, Selection, and Admissions.<br>☒ ☐ Financial Resources.<br>☒ ☐ Rent Determination.<br>☐ ☒ Operation and Management.<br>☐ ☒ Grievance Procedures.<br>☐ ☒ Homeownership Programs.<br>☐ ☒ Community Service and Self-Sufficiency Programs.<br>☒ ☐ Safety and Crime Prevention.<br>☐ ☒ Pet Policy.<br>☐ ☒ Asset Management.<br>☐ ☒ Substantial Deviation.<br>☐ ☒ Significant Amendment/Modification<br><br>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): Description of HACFM's revisions of PHA plan elements are provided beginning on page 6.<br><br>(c) The PHA must submit its Deconcentrating Policy for Field Office review. |
| B.2 | **New Activities.**<br><br>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?<br><br>Y N<br>☒ ☐ Hope VI or Choice Neighborhoods.<br>☒ ☐ Mixed Finance Modernization or Development.<br>☒ ☐ Demolition and/or Disposition.<br>☒ ☐ Designated Housing for Elderly and/or Disabled Families.<br>☒ ☐ Conversion of Public Housing to Tenant-Based Assistance.<br>☒ ☐ Conversion of Public Housing to Project-Based Assistance under RAD.<br>☒ ☐ Occupancy by Over-Income Families.<br>☐ ☒ Occupancy by Police Officers.<br>☒ ☐ Non-Smoking Policies.<br>☒ ☐ Project-Based Vouchers.<br>☒ ☐ Units with Approved Vacancies for Modernization.<br>☒ ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).<br><br>(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.<br><br>Description of new activities which HACFM intends to undertake are provided. Please see Response starting on page 6. |

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| **B.3** | **Civil Rights Certification.**<br><br>Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan. |
| **B.4** | **Most Recent Fiscal Year Audit**.<br><br>(a) Were there any findings in the most recent FY Audit?<br><br>☐ ☒ N<br><br>(b) If yes, please describe: |
| **B.5** | **Progress Report.**<br><br>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. |
| **B.6** | **Resident Advisory Board (RAB) Comments.**<br><br>☐ ☒ (a) Did the RAB(s) provide comments to the PHA Plan?<br><br>Y N<br><br>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. |
| **B.7** | **Certification by State or Local Officials.**<br><br>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.<br><br>☐ ☒ ☐ |
| **B.8** | **Troubled PHA.**<br>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?<br>Y N N/A<br><br>(b) If yes, please describe: HACFM currently has an approved Corrective Action Plan (CAP) outlining the corrective action plans that it will initiate to address unit condition deficiencies identified during the REAC Quality Control Physical Assessment Subsystem (PASS) inspections. |
| **C.** | **Statement of Capital Improvements**. Required for all PHAs completing this form that administers public housing and receive funding from the Capital Fund Program (CFP).<br>**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. |

**B. 1 Revision of PHA Plan Elements:**
The following PHA plan elements have been revised by HACFM:

**Statement of Housing Needs and Strategy for Addressing Housing Needs**
The Housing Authority of the City of Fort Myers (HACFM) identifies the needs of the extremely low income, very- low income, low-income, elderly, and disabled families. HACFM will utilize the Rental Assistance Demonstration Program, implemented by HUD in 2012, to rehabilitate some of the existing public housing portfolio without largely relying on federal funding. The program authorizes public housing authorities (PHAs) to convert their existing
public housing units to project-based voucher assistance units. PHAs are then able to utilize private market financing tools, such as low-income housing tax credits and multifamily housing bonds to substantially renovate their public housing portfolios.

The HACFM previous ambitious plan to convert its public housing portfolio using HOPE VI was widely successful for the replacement of outdated developments. HACFM will continue to use the CNI (Choice Neighborhood Initiative) to further redevelop its oldest public housing site. Also, the remaining public housing subsidy units located in the old HOPE VI program site will utilize the RAD Program, and other strategic planned measures to leverage public/private funds for the repositioning and redeveloping of the Public Housing remaining.

HACFM is aware renters have the most severe housing cost burdens, especially at the lowest income levels – extremely low and very low-income families – as well as elderly and disabled families. The jurisdiction has a shortfall in affordable units for very low and extremely low-income households, with many very low-income individuals paying over 50% of their income for housing. There is a significant shortage of affordable rental housing in the jurisdiction meeting the 30% of AMI and below families.

Therefore, HACFM is partnering with the City to explore public funds collaboratively that leverage private sector investment, as well as encourage a high degree of community support and engagement.

**Our initial goal is to:**
- *Engage the community to make affordable housing a citywide priority*
- *Reduce the number of public housing vacancies*
- *Increase voucher utilization*
- *Utilize the Rental Assistance Demonstration Program to convert public housing to project-based assistance*
- *Leverage private and public funds including Low-Income Tax Credits to create new senior and multi- family housing opportunities.*

**B1: Revision of PHA Plan Elements: Administrative Plan**
Rental Assistance Demonstration Considerations:

In accordance with HUD rules related to elderly PH buildings converting to Section 8 assistance HACFM will adopt elderly and/or disabled preferences in the administrative plan for previous PH communities that contained and elderly and/or elderly/disabled designation.

Additional administrative plan changes related to RAD conversations that are anticipated include:

A turnover cap on the number of vouchers issued to families who wish to move from RAD communities
Site specific utility allowances
Waiting list administration including the consideration of site-specific waiting lists for converted projects when allowed by regulation
All other provisions of RAD notice PIH-2012-32 (HA) Rev-2 and all successor notices as required by conversion are incorporated herein by reference.

**Rent Determination**
HUD PIH Notice 2019-11 was issued to PHA's regarding Public Housing Over Income Limits under the Housing Opportunities through Modernization Act of 2016 (HOTMA). HACFM may increase the families rent to the applicable Fair Market or terminate the tenancies of families who are over income (120% of the HUD published AMI) unless the family has a valid contract for participation in the FSS program under 24 CFR 984 or if the family currently receives the Earned Income disallowance (EID) provided by 42 U.S.C. 1437 (d) and the 24 CFR 960.255.

**Significant Amendment/Modification**
In accordance with HUD regulations in 24 CFR 903.7 (r) and 24 CFR 905.3, HACFM has defined below the basic criteria that will be used for determining: (i) substantial deviation from its 5-Year Plan; (ii) significant amendment or
modification to the 5-Year and Annual PHA Plans; and (iii) significant amendment or modification to the Capital

Fund Program (CFP) 5-Year Action Plan. Prior to implementing changes that meet such criteria, HACFM will submit for HUD's approval, a revised Plan(s) that meets full public process requirements including Resident Advisory Board review and consultation.

HACFM's criteria, as defined below, is applicable to all CFP components including Capital Fund grants; Replacement Housing Factor (RHF) grants; Disaster Grants; Capital Fund Financing Program (CFFP) allocations; as well as any new or future formula components such as Demolition and Disposition Transitional Funding (DDTF).

Criteria for defining "Substantial Deviation" from the 5-Year Plan:

- A major change in the direction of HACFM pertaining to its mission and goals would constitute a "substantial deviation" from the Agency's 5-Year Plan.

- Examples include the undertaking of new program activities, development strategies, or financing initiatives that do not otherwise further HACFM's stated mission and goals as articulated in the 5-Year Plan or Annual Plan.

Criteria for defining "Significant Amendment or Modification" to the 5-Year and Annual PHA Plans:
- Changes to rent, admission policies, or organization of the waiting list(s) in the Public Housing Program that will impact more than 10% of applicants and/or households assisted under the Program.
- Changes to rent, admission policies, or organization of the waiting list(s) in the Housing Choice Voucher Program that will impact more than 10% of applicants and/or households assisted under the Program.

- Substantial changes to demolition, disposition, designated housing, homeownership, or conversion activities identified in the current HUD-approved Annual or 5-Year Plans.

Criteria for defining "Significant Amendment or Modification" to the Capital Fund Program (CFP) 5-Year Action Plan:

- Proposed demolition, disposition, homeownership, Capital Fund financing, development, RAD conversions, or mixed-finance proposals will be considered significant amendments to the CFP 5- Year Action Plan.
    - Additions of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceeds $2 million.

Exceptions:

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state, or local laws/ordinances, or because of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification.
- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.

**B.2 New Activities**

**HOPE VI or Choice Neighborhoods**

In partnership with the City of Fort Myers and other local government agencies, the HACFM will be involved in implementation efforts for the recently awarded CNI Implementation grant during 2021. All implementation grant activities are outlined in the approved implementation plan. HACFM intends to close out the CNI grant by end of 2027.

**Mixed Finance Modernization or Development**

HACFM has set strategic priorities to transform its entire public housing portfolio into mixed-income communities over the next 2-3 years, to reposition the agencies remaining public housing units/ subsidy units into better performing developments that are competitive in the marketplace as well as improve their physical and social conditions.

HACFM has been responsible for redeveloping challenged neighborhoods that have not been invested in and/or neglected for some time. HACFM and/or its subsidiary entity(s) plans to seek all available development opportunities and either partner with other developers or self-develop properties using HUD's mixed-finance approach.

HACFM envisions a range of options that will be employed to achieve its goal to transform its portfolio which may include but not be limited to: modernization of existing public housing units; demolition of selected units and construction of new units; introduction of market rate and for-sale units; acquisition and development of new units in, around and outside of HACFM properties and throughout Lee County; voluntarily conversion to project based assistance and wholesale redevelopment of its public housing communities. HACFM may elect to sell any underperforming assets in the Low-Income Housing Tax Credit Program. Also, HACFM may elect disposition of publicly subsidized units within LIHTC development to reposition financially.

In the future, HACFM may submit a mixed-finance application/proposal to HUD to pursue the construction of new public housing units using any accumulated Asset Repositioning funds leveraged with public and private sources.

HACFM may also decide to accumulate future grant funding and use it for the potential redevelopment of HACFM other public housing communities and/or for other projects under the mixed-finance development approach. Additional acquisitions of vacant land or other existing rental properties, adjacent to current public housing sites, and or in nearby areas, may also be initiated, subject to submission and approval by HUD of the appropriate development proposals.

Other mixed-finance transactions (via acquisition or new construction or both) may be proposed later in the Plan year commensurate with HACFM future Strategic Business Plan.

HACFM plans to pursue public housing development activities and will utilize the other subsidiary entities for development, financing, and the formation of a variety of ownership structures as well as utilize subsidiary entities for the operation of public and non-public housing programs.

**Mixed Finance Modernization or Development cont.' d**

The Authority may choose to use Capital Funds, Low Income Housing Tax Credits (LIHTC) and other public and private funds to complete the redevelopment of Southward Village, Renaissance Preserve Senior and Family, and Bonair Towers site.

HACFM may choose to select master developers for some or all these sites. HACFM also may use Capital Funds and other funds to acquire and redevelop properties in and around its LIHTC and/or prior public housing communities. In addition, HACFM may utilize project-based vouchers for additional affordable housing initiatives, redevelopment projects, replacement housing options and relocation options for residents affected by redevelopment and disposition plans.

The HACFM may choose to submit multiple applications under the RAD program for the conversion of existing public housing to Project Based Rental Assistance under the guidelines of **Notice PIH 2012-32, REV-3** and any successor Notices. Upon conversion to Project Based Rental Assistance, the Authority and/or new established

ownership will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions to PBV: Section 1.7.B & 1.7.C of **PIH Notice 2012-32, REV-3**). The HACFM 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 the Housing Authority of the City of Fort Myers with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACFM may also borrow funds to address their capital needs.

Demolition and/or Disposition

Commented [S1]: On today's call it was mentioned that our annual plan will require the DDA language for RPI

HACFM will seek to perform the redevelopment of Bonair Towers through the low-income housing tax credit program. We will apply for new construction credits from Florida Housing Finance Corporation. The disposition of the land will be to a public private partnership to accomplish the revitalization activities using low-income tax credit program. HACFM will seek to dispose any ACC public housing units within a LIHTC development to newly created partnership for the financial restructure of each partnership and LIHTC compliance periods.

**Conversion of Public Housing to Tenant-Based Assistance**

This section describes, with respect to HACFM-owned public housing: 1) any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or that the public housing agency plans to voluntarily convert; 2) the analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion.

HACFM will continue to analyze units in its portfolio to be converted where the conversion to project or tenant-based vouchers is economically beneficial and will increase housing opportunities. HACFM's approach may include seeking additional funding authority in the voucher program to increase project-based opportunities at elderly and family public housing communities. HACFM may also elect to utilize Low-Income Housing Tax Credit (LIHTC) equity and other resources to facilitate the conversion of the developments mentioned above.

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

Convert public housing to project-based assistance under Rental Assistance Demonstration (RAD). The HACFM may choose to submit multiple applications under the RAD program for the conversion of existing public housing to Project Based Rental Assistance (PBRA) and/or Project Based Vouchers (PBV) under the guidelines of **Notice PIH 2012-32, REV-3** and any successor Notices. Upon conversion under RAD, the Authority and/or new established ownership will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions under RAD: Section 1.7.B &
1.7.C of **PIH Notice 2012-32, REV-3**).

These resident rights, participation, waiting list and grievance procedures are attached to this notice. Additionally, HACFM 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 HACFM with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACFM may also borrow funds to address their capital needs.

Please find specific information below related to the Public Housing Development(s) selected for RAD-on-RAD Amendment #1.

**Rental Assistance Demonstration Amendment # 1**

HACFM may submit applications for Rental Assistance Demonstration (RAD). As a result, in correlation, HACFM may then convert to Project-Based Assistance under the guidelines of **Notice PIH 2012-32, REV-3** and any successor Notices. Upon conversion to Project-Based Assistance, will adopt the resident rights, participation, waiting list and grievance procedures listed in for conversions *under RAD:* Section 1.7 B & 1.7 C of **Notice PIH 2012-**
**32, REV-3.**

These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, HACFM certifies that it is currently compliant with all fair housing and civil rights 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 the HACFM with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration and may also borrow funds to address their capital needs.

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

Development #1

| Name of Public Housing | PIC Development ID: | Conversion Type: | Transfer of Assistance: |
|---|---|---|---|
| East Point Place<br>**Total Units:**<br>**86** | FL047000002<br>**Pre-RAD Units:**<br>**12** | **PBRA/PBV**<br>**Post-RAD Units:**<br>**12** | **12**<br>**CFG Allocation:**<br>**$60,700.00** |
| **Bedroom Type:** | **Number of Units Pre-Conversion:** | **Number of Units Post Conversion:** | **Change in Number of Units per bedroom type:** |
| Efficiency | | | |
| One Bedroom | | | |
| Two Bedroom | | | |
| Non-Dwelling | | | |

Development #2

| Name of Public Housing Development: | **PIC Development ID:** | **Conversion Type:** | **Transfer of Assistance:** |
|---|---|---|---|
| Renaissance Family<br>**Total Units:**<br>**204** | FL047000008, FL047000009, FL0470000 11, FL0470000 13<br>**Pre-RAD Units:** | **PBRA/PBV**<br>**Post-RAD Units:**<br>**204** | **0**<br>**CFG Allocation:**<br>**$522,500** |
| **Bedroom Type:** | **Number of Units Pre-** | **Number of Units Post Conversion:** | **Change in Number of Units per** |
| Efficiency | **0** | 0 | |
| One Bedroom | 25 | 25 | |
| Two Bedroom | 65 | 65 | |
| Three Bedroom | 72 | 72 | |
| **Four Bedroom** | **36** | **36** | |
| **Five Bedroom** | **6** | **6** | |

Development #3

| **Name of Public Housing Development:** | **PIC Development ID:** | **Conversion Type:** | **Transfer of Assistance:** |
|---|---|---|---|
| Renaissance Senior | **FL047000007** | **PBRA/PBV** | **0** |
| **Total Units:** | **Pre-RAD Units:** | **Post-RAD Units:** | **CFG Allocation:** |
| **96** | **96** | **96** | **$112,551.00** |
| **Bedroom Type:** | **Number of Units Pre- Conversion:** | **Number of Units Post Conversion:** | **Change in Number of Units per bedroom type:** |
| Efficiency | | | |
| One Bedroom | 93 | 93 | |
| **Two Bedroom** | **3** | **3** | |

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Exhibit A
Resident Rights, Participation, Waiting List and Grievance Procedures

PBV Resident Rights and Participation

1. No Rescreening 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, the first clause of section 8(c) (4) of the Act and 24 CFR *§* 880.603(b), concerning determination of eligibility and selection of tenants, 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 resident 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 1.6B.7 and Section 1.7A.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 a PHA or Owner'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. Phase-in of Tenant Rent Increases. If a resident's monthly rent increases by more than the greater of I0 percent or $25 purely because of conversion, the rent increase will be phased in over 3 years, which a PHA may extend to *5* years. To implement this provision, HUD is waiving section 3(a) (J) of the Act, as well as 24 CFR *§* 880.201 (definition of "total tenant payment"), to the limited extent necessary to allow for the phase-in of tenant rent increases.

   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 "Calculated Multifamily TIP" refers to the TIP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TIP" refers to the ITP recorded on the family's most recent HUD Form 50059.

   Three Year Phase-in:

   **Year I:** Any recertification (interim or annual) performed prior to the second annual recertification after conversion -33% of difference between most recently paid Total Tenant Payments (TTP) and the calculated Multifamily housing TIP
   **Year 2:** Year 2 Annual Recertification (AR) and any Interim Recertification (IR) in prior to Year 3 AR -66% of difference between most recently paid ITP and calculated M
   **Year 3:** Year 3 AR and all subsequent recertifications -Year 3 AR and any IR in Year 3: Full Multifamily housing TTP multifamily housing TTP.

   Please Note: In either the three-year phase-in or the five-year phase-in, once Multifamily housing TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full multifamily housing TTP from that point forward.

4. Public Housing Family Self-Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency (ROSS-SC). Current PH PSS participants will continue to be eligible for FSS once their housing is converted under RAD. All owners will be required to administer the FSS program in accordance with the participants' contracts of participation and future guidance published by HUD.

   Owners may not offer enrollment in FSS to residents in projects converted to PBV that were not enrolled in the PH FSS program prior to RAD conversion, nor may owners offer FSS enrollment to any new residents at the project. Owners will be allowed to use any funds already granted for PH.

FSS coordinator salaries until such funds are expended. All owners will be required to provide both service coordinators and payments to escrow until the end of the Contract of Participation. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility under a RAD conversion. As the PH FSS grant is the source of funding for PH FSS, program compliance will continue to be monitored by the Office of Public and Indian Housing.

5. Resident Participation and Funding. Residents of covered projects converting assistance to PBV will have the right to establish and operate a resident organization in accordance with 24 CFR Part 245 (Tenant Participation in Multifamily Housing Projects). In addition, in accordance with Attachment

6. Resident Procedural Rights. The information provided below must be included as part of the House Rules for the associated project and the House Rules must be furnished to HUD as part of the Financing Plan submission. See Attachment for a Sample Addendum to the House Rules.

a) Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects converting assistance under RAD, that supplement notification requirements in regulations at 24 CFR § 880.607 and the Multifamily HUD Model Lease.

b) *Termination of Tenancy and Assistance.* The termination procedure for RAD conversions to PBV will additionally require that PHAs (as owners) provide adequate written notice of termination of the lease which shall not be less than:
•A reasonable period but not to exceed 30 days or current HUD regulations of notices:

- If the health or safety of other tenants, owner 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; or 0
14 days in the case of nonpayment of rent.
- *Termination of Assistance.* In all other cases, the requirements at 24 CFR § 880.603, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply.

c) Grievance Process. In addition to program rules that require that tenants are given notice of covered actions under 24 CFR Part 245 (including increases in rent, conversions of a project from project-paid utilities to tenant-paid utilities, or a reduction in tenant paid utility al1owances), HUD is incorporating resident procedural rights to comply with the requirements of section 6 of the Act. RAD will require that:

- Residents be provided with notice of the specific grounds of the proposed owner adverse action, as wel1 as their right to an informal hearing with the PHA (as owner);
- Residents wi11 have an opportunity for an informal hearing a reasonable amount of time and an impartial member of PHA's staff (as owner) within;
- Residents will have the opportunity to be represented by another person of their choice, to ask questions of witnesses, have others, make statements at the hearing, and to examine any regulations and any evidence relied upon by the owner as the basis for the adverse action. With reasonable notice to the PHA (as owner), prior to hearing and at the residents' own cost, residents may copy any documents or records related to the proposed adverse action; and
- PHAs (as owners) provide the residents with a written decision stating the grounds for the adverse action within a reasonable amount of time, and the evidence the PHA (as owner) relied on as the basis for the adverse action.

d) The PHA (as owner) will be bound by decisions from these hearings, except if the:

- Hearing concerns, a matter that exceeds the authority of the impartial party conducting the hearing. ii. Decision is contrary to HUD regulations or requirements, or otherwise contrary to federal, State, or local law.
- If the PHA (as owner) determines that it is not bound by a hearing decision, the PHA must promptly notify the resident of this determination, and of the reasons for the determination.

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 exclusion after conversion, in accordance with regulations at 24 CFR § 960.255. After conversion, no other tenants will be eligible to receive the EID. If a tenant receiving the EID exclusion undergoes a break in employment, ceases to use the EID exclusion, or the EID exclusion expires in accordance with 24 CFR §960.255, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR
§960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically be adjusted to the appropriate rent level based upon tenant income at that time.

10. PBV: Other Miscellaneous Provisions

- 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.

- Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3. The Davis-Bacon Act (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) and Section 3 (24 CFR Part 135) apply to all initial ·repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation. (The Davis-Bacon Act only applies for projects with nine or more units.)

- 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. 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 waitlist 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.

- 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 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 (i.e., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (i.e., 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). For more information on serving persons with LEP, please see HUD 's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007. Section I: Public Housing Projects PIH-2012-32 (HA) Rental Assistance Demonstration – Final Implementation 59.

- To implement this provision, HUD will not apply 24 CFR § 880.603, regarding selection and admission of assisted tenants. 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 §

880.603.

- Mandatory Insurance Coverage. The project shall always maintain 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.

- Choice-Mobility. HUD seeks to provide all residents of covered projects with viable Choice Mobility options. PHAs that are applying to convert the assistance of a project to PBV are required to provide a Choice-Mobility option to residents of covered projects in accordance with the following:
- Resident Eligibility. Residents have a right to move with tenant-based rental assistance (e.g., Housing Choice Voucher (HCV)) the later of: (a) 24 months from date of execution of the HAP or b) 24 months after the move-in date.
- Voucher Inventory Turnover Cap. Recognizing the limitation on the availability of turnover vouchers from year to year, a voucher agency would not be required, in any year, to provide more than one-third of its turnover vouchers to the residents of the projects covered. While a voucher agency is not required to establish a voucher inventory turnover cap, if implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households are received.
- Project Turnover Cap. Also recognizing the limited availability of turnover vouchers and the importance of managing turnover in the best interests of the property, in any year, a PHA may limit the number of Choice-Mobility exercised by eligible households to
  15 percent of the units assisted in the project. (For example, if the project has 100 assisted units, the PHA could limit the number of families exercising Choice-Mobility to 15 in any year, but not less than 15.) While a voucher agency is not required to establish a project turnover cap, if implemented the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received.

**Site Selection and Neighborhood Standards Review for Transfer of Assistance**

Description of the new site and how it is adequate for the needs of the tenants and is consistent with or furthers the goal of deconcentrating poverty.

The redevelopment of all HACFM's properties will tie into an overall plan and initiative to revitalize distressed neighborhoods and spur additional redevelopment opportunities throughout qualifying areas within the City of Fort Myers and Lee County. Once developed, the new and revitalized housing will provide enhanced amenities and improved living environments for program participants and surrounding communities.

2. If transferring assistance to an area of concentrated poverty:
Various methods for demonstrating furthering the goals of deconcentrating poverty include:

• Mixed income developments; Development in a HUD Enterprise Zone, Economic Community, Renewal Community, or a Revitalization Zone, including any areas where current or future HOPE VI or Choice Neighborhoods Initiative developments exist.

3. If transferring assistance to a development qualifying as new construction in an area of minority concentration

1. Sufficiency of comparable opportunities for minority families in the income range to be served by the project outside areas of minority concentration;

2. Please examine 24 CFR §983.57(e) (3) (iv) & (v) to see more on comparable opportunities.

HACFM redevelopment site(s) satisfy Section IV and V. Several comparable LIHTC or affordable housing developments are located Countywide and have been completed in the last 10 years.

3. If there is an overriding housing need, which includes whether this is an integral part of an overall redevelopment strategy in a revitalizing area;

Please see 24 CFR §983.57(e) (3) (vi) for more information on overriding housing needs.

All proposed HACFM redevelopment will have a positive impact on the entire County and help to revitalize distressed neighborhoods, and spur additional development opportunities, and support the City of Fort Myers Consolidated Plan.

**Relocation Plan**
HACFM will prepare a phased relocation plan designed to comply with all required guidelines and ensure a smooth transition.

**Significant Amendment Definition**
As a part of the Rental Demonstration (RAD), Commission is redefining the definition of the substantial deviation from the PHA Plan to exclude the following RAD specific items:

a. Changes to the Capital Fund Budget produced because of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
c. Changes to the financing structure for each approved RAD conversion.

**B.2 Project Based Vouchers:**

The HACFM plans to seek opportunities for developing Project Base VASH Vouchers units as well as the consideration of the use of PBV in other redevelopment and replacement housing options.

This section describes the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

When funding becomes available, the Authority plans to use some of its vouchers under the "Project Based Vouchers" ("PBV") option, as described at 24 CFR Part 983. This may be done in one of three ways.

- First, HACFM may issue a Request for Proposals from owners wishing to participate in the program. The criteria and procedures for such selections will be described in the RFP and in the HACFM's HCVP (Section 8) Administrative Plan.

- Second, HACFM may make non-competitive selections of owners whose projects included a competitive selection of proposals, such as housing assisted under a federal, state, or local government housing assistance, community development, or supportive services program.

- Thirdly, HACFM may use its authority under HOTMA to attach PBV's without a competitive process in projects where it has ownership interest and is engaged in an initiative to improve, develop, or replace a public housing property or site. HACFM will detail within its Administrative Plan what work it plans to do on the property or sites, the location and number of PBV units and the HUD regulations and HACFM policies related to the PBV program.

The Authority may also submit a proposal under an RFP for units in its public housing portfolio or a property it may acquire for this purpose. The use of PBVs is consistent with the overall PHA Plan, which is encouraging the development of affordable mixed-use, mixed-income housing particularly in consort with broader neighborhood revitalization efforts in projects throughout the County.

HACFM's PBV criteria and procedures will propose the use of these resources in ways that facilitate achievement of its overall housing goals in general and the mobilization of potential relocation resources, to address the housing needs of HACFM families at developments slated to be redeveloped throughout the City and County.

Under the HUD Asset Management Model, some of HACFM's developments may not be financially sustainable because insufficient Annual Contract Contribution (ACC) subsidy is received from HUD to support their operations. HACFM is currently evaluating options for restructuring the properties; possibly seeking to convert these properties to Project-based Section 8 communities.

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)

As funds become available, HACFM intends to explore all opportunities for additional capital fund proceeds. HACFM will continue to seek additional revenue sources and utilize available programs to address the severe capital needs within its aging LIHTC housing stock and preserve affordable housing that is decent, safe, and sanitary.

Repositioning of Public Housing

The HACFM Plans to review the feasibility of converting public housing units at Renaissance Preserve I, II, III, IV and East Pointe Place under the RAD program; 314 units. HACFM will review all grants or other funding made available through local, state, and federal funding programs.

**B.5 Progress Report**

The HACFM has made tremendous strides in completing goals and objectives as documented in our PHA 5-Year Plan. We have successfully completed four (4) public housing transformations for HACFM in the past 5 years. HACFM has successfully implemented the Choice Neighborhood Initiative Grant, to which one development of 92 units of mixed income and mixed use was completed in 2025 and leased in 2026. HACFM completed a financial closing on Phase II CNI housing on site of the prior Southward Village. HACFM completed the demolition of the old Horizons public housing complex, completed the financial closing in March 2026 and started construction. In addition, HACFM sold the prior Royal Palm Towers public housing complex, relocated all residents, and rebuilt this senior housing (80 units) complex in 2026.
During the past few years, HACFM has applied and been awarded $80 million in CDBG DR funding to assist in rebuilding and rehabilitation of affordable housing units and developments. Currently HACFM is implementing $27 million in the rehabilitation of Renaissance Preserve, Landings at East Pointe, and East Pointe Place. We are expected to be completed by the end of 2027.

The PHA continues to provide quality housing that is affordable to the low, very low, and extremely low-income households. Strategies pursued by the HACFM as outlined in the 5 Year PHA plan were successful and allowed the authority to meet our mission to continue to promote adequate and affordable housing, economic opportunities, and a suitable living environment free from discrimination**.**

**Goal:** Increase the availability of decent, safe, and affordable housing
**Progress:** The HACFM proposes to apply for a Choice Neighborhoods Planning and/or Implementation Grant to transform one of our Public Housing developments into a mixed-income community with public, workforce, and market rate housing.

The PHA plans to increase available decent, safe, and affordable housing by issuing Request for Proposals (RFPs) for VASH Project based vouchers in 2027. This not only increases the availability of housing but also increases housing choices for homeless Veterans.

**Goal:** Increase assisted housing choices
**Progress:**

- The HACFM continues to conduct proactive outreach and build relationships with other governmental agencies, landlords, non-profits, and other businesses to partner to increase options for low-income residents.
- The HACFM continues to research the feasibility of changes to homeownership, and other affordable housing options to increase the housing choices for public housing residents.
- The HACFM is increasing the number of project-based units to increase the housing choices for participants. This is becoming increasingly important as the market tightens and there is less available rental housing stock.

**Goal:** Improve community quality of life and economic vitality
**Progress:**

The HACFM has a Community and Supportive Services Department that includes one Family Self Sufficiency Coordinator for HCV and one for public housing that provides resources, referrals, goal setting for participants and residents seeking economic self-sufficiency, access to a variety of programs, and supportive services. The HACFM has refined its processes to help residents identify the critical needs and coordinate them across the supportive services through resident services. The HACFM continues to expand services pending the availability of financial resources and awarding of funds for the coordinator position.

**Goal:** Ensure Equal Opportunity to Housing for all Americans
**Progress:**

The PHA continues to take affirmative measures to ensure that access to assisted housing is provided regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, and gender identity. Continue to ensure that fair housing efforts continue to be implemented.

**B.6 Resident Advisory Board (RAB) Comments**

HACFM met with all the RAB Board Members and HACFM Resident Councils. No Comments were received on the Annual Plan, as most of the changes addresses in the Annual Plan were discussed throughout the year in Resident Council Meetings. HACFM held the Annual Plan and 5 Year Capital Improvement Plan Meeting in November 2026.

**B.7 Certification by State and Local Officials**

Form HUD 50077 – ST, 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. Statement of Capital Improvements**

**C.1 Capital Improvements**

The HUD approved 5-year Action Plan 50075.2 was approved December 22, 2025. Below are the awarded and estimated future years of capital funds.

CFG FY 2023 - $2,117,611

CFG FY2024 $2,210,913

CFG FY 2025 - $2,254,923

CFG FY 2026 - $2,319,714

(estimate) CFG FY 2027 - $1,500,000

| | Planned $ | Planned Uses |
|---|---|---|
| **Federal Grants (CY 2027 grants)** | | |
| **Public Housing Operating Fund** | 2,487,208 | 2,487,208 |
| **Public Housing Capital Fund** | 1,500,000 | 1,500,000 |
| **Housing Choice Voucher Funds** | 33,416,302 | 33,416,302 |
| **Family Self Sufficiency** | 254,000 | 254,000 |
| **Community Development Block Grant - DR** | 24,567,741 | 24,567,741 |
| **HOME** | 0 | 0 |
| **Choice Neighborhood** | 14,366,671 | 14,366,671 |
| **Other Federal Grants (list below)** | 0 | 0 |
| | | |
| **Prior Year Federal Grants (unobligated funds only, list below)** | 0 | 0 |
| **2022 Hazard Grant** | 13,524 | 13,524 |
| **2023 CFP** | 42,281 | 42,281 |
| **2024 CFP** | 97,325 | 97,325 |
| **2025 CFP** | 117,336 | 117,336 |
| **2026 CFP** | 1,713,833 | |
| **Public Housing Dwelling Rental Income** | 1,343,088 | 1,343,088 |
| | | |
| **Other Income (list below)** | | |
| **HCVP Admin Fees** | 2,646,873 | 2,646,873 |
| **PHA HCVP Admin Reserves as of 10/19/2026** | 1,816,276 | 1,816,276 |
| **PHA HCVP Reserves as of 10/19/2026** | 200,690 | 200,690 |
| **PHA LIPH Reserves as of 09/30/2026** | 4,361,059 | 4,361,059 |
| **Non-federal sources (list below)** | | |
| **Investments** | 3,087,699 | 3,087,699 |
| **Tenant - Other** | 2,078,580 | 2,078,580 |
| **Total Resources** | 94,110,484 | 92,396,651 |