



2024-2025

ANNUAL ACTION PLAN

PREPARED FOR THE CITY OF ANNISTON
COMMUNITY DEVELOPMENT

Table of Contents

Executive Summary	3
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies – 91.200(b).....	8
AP-10 Consultation – 91.100, 91.200(b), 91.215(l).....	9
AP-12 Participation – 91.105, 91.200(c).....	13
Expected Resources	15
AP-15 Expected Resources – 91.220(c)(1,2)	15
Annual Goals and Objectives	17
Projects.....	20
AP-35 Projects – 91.220(d).....	20
AP-38 Project Summary	22
AP-50 Geographic Distribution – 91.220(f)	28
Affordable Housing	29
AP-55 Affordable Housing – 91.220(g)	29
AP-60 Public Housing – 91.220(h).....	30
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	31
AP-75 Barriers to affordable housing – 91.220(j)	34
AP-85 Other Actions – 91.220(k).....	35
Program Specific Requirements.....	37

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Each year, the City of Anniston (City) participates as an Entitlement Grantee in the Community Development Block Grant (CDBG) Program and as a Participating Jurisdiction (PJ) in the HOME Investment Partnerships Program (HOME). These programs are administered by the U.S. Department of Housing and Urban Development (HUD) and provides funding for a variety of different community development, housing, and public service activities. This plan serves as the application for funding for these federal entitlement programs. All funding allocated for these programs must be spent within the City of Anniston. The administration of these grant funds and development of this Annual Action Plan for these programs fall under the purview of the Community Development with the City of Anniston.

This Action Plan covers the period of October 1, 2024 to September 30, 2025 and represents the 2nd year of the City's approved 2023 – 2027 Consolidated Plan. Consolidated Plan objectives are carried out through the Annual Action Plan, which provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used in PY2024 to address priority needs and specific goals identified in the Consolidated Plan.

The City will receive \$513,533.00 and \$288,403.45 in CDBG and HOME funds, respectively.

The CDBG program is authorized under Title I of the Housing and Community Development Act of 1974, as amended, with the primary purpose of developing viable communities. The CDBG regulations require that at least 70 percent of all CDBG funds are used to benefit low- and moderate-income residents who are members of households that earn less than 80 percent of Area Median Income (AMI). Regulations governing the CDBG program require that each activity undertaken with CDBG funds meet at least one (1) of the three (3) broad national objectives:

- 1) Benefit people with low- and moderate-incomes.
- 2) Aid in the prevention or elimination of slums and blight; or
- 3) Meet an urgent need (such as earthquake, flood, or hurricane relief).

According to HUD's Consolidated Plan Final Rule, the overall goal of community planning and development programs is to develop viable urban communities for low- and

moderate-income persons by providing:

- Decent Housing
- A Suitable Living Environment; and
- Expanding Economic Opportunities

HOME Program

The HOME program, created under Title II (the Home Investment Partnerships Act) of the National Affordable Housing Act of 1990, represented a historic affirmation of the Federal Government’s commitment to providing decent, safe, and affordable housing for all Americans as well as to alleviate the problems of excessive rent burdens, homelessness, and deteriorating housing stock nationwide. The HOME program allows eligible PJs to use funds on a vast array of eligible activities, including but not limited to new construction, rehabilitation, acquisition of standard housing, assistance to new homebuyers, and tenant-based rental assistance.

2. Summarize the objectives and outcomes identified in the Plan

According to HUD’s Consolidated Plan Final Rule, the overall goal of community planning and development programs is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons as follows:

Outcomes and Objectives

Decent Housing (DH): Includes assisting homeless persons to obtain appropriate housing and assisting persons at risk of becoming homeless; retention of the affordable housing stock; and increasing the availability of permanent housing in standard condition and affordable cost to low-income and moderate-income families, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability. Decent housing also includes increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low-income persons accessible to job opportunities.

A Suitable Living Environment (SL): Includes improving the safety and livability of neighborhoods; increasing access to quality public and private facilities and services; reducing the isolation of income groups within a community or geographical area through

the spatial de-concentration of housing opportunities for persons of lower-income and the revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.

Expanded Economic Opportunities (EO): Includes job creation and retention; establishment, stabilization and expansion of small businesses (including micro-businesses); the provision of public services concerned with employment; the provision of jobs involved in carrying out activities under programs covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing.

Consolidated Plan Priorities

During the 2024-2025 program year, the City will allocate funds towards activities that address the following five (5) High Priority Needs identified in the Consolidated Plan.

Priority 1- Administration and Planning High Need:
<p>Provide for administration and planning activities to develop housing and community development strategies and programs needed to carry out actions that address identified needs in the Consolidated Plan in accordance with HUD regulations.</p> <ul style="list-style-type: none"> • CDBG/HOME Administration
Priority 2- Affordable Housing High Need:
<p>Support new construction/ rehabilitation of housing for low-income households</p> <p>2024 Activities</p> <ul style="list-style-type: none"> • CDBG –Owner Occupied Minor Housing Rehabilitation • HOME - CHDO Reserve (15% minimum set aside); • CDBG - Tenant Based Rental Assistance • CDBG - New Construction of Affordable Housing
Priority 3- Public Facility Improvements in Low-Mod Areas [High Need]:
<p>The City proposes to fund public infrastructure and redevelopment projects that benefit qualifying low and moderate-income areas and for eligible populations.</p>

Included in these activities; are neighborhood parks improvement in LMAs, street improvements in LMAs, and clearance and demolition of blighted structures.

2024 Activities

- Code Enforcement – Blight Removal of Substandard and Dangerous Structures
- Public Works – Infrastructure Improvement in LMA

Priority 4- Public Services [High Need]:

Provision of public services.

2024 Activities

- Community Utility Assistance
- Healthcare Access Expanded
- Afterschool Enrichment - Power Hour, Making Every Minute Count
- Emergency Assistance
- Fair Housing Education & Outreach

Priority 5 – Housing Services for Homeless At Risk

Supporting short- and long-term homeless facilities, housing, and associated services

2024 Activities

- The Right Place for Housing & Support – Supportive Services

3. Evaluation of past performance

The City of Anniston received \$544,919.00 in CDBG funding and \$403,576.00 in HOME funding. The City expended a total of \$602,918.42 for the following CDBG-eligible activities: facility improvements (\$114,863.69), public service activities (\$77,217.52), clearance and demolition activities in low mod areas (\$309,322.36) and general administration (\$101,514.85). The City expended a total of \$550,352.67 in HOME funds for the following eligible activities: Tenant-Based Rental Assistance (\$21,855.98), new construction of affordable rental housing (\$488,139.09) and planning and administration (\$40,357.60).

4. Summary of Citizen Participation Process and consultation process

In accordance with the City’s adopted Citizen Participation Plan (CPP), the City facilitated citizen participation through community meetings and public hearings. Efforts were made to encourage participation by low- and moderate-income persons, particularly

those living in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The City also made efforts to encourage the participation of minorities and non-English speaking persons, as well as persons with disabilities. In preparation of the 2024-2025 Action Plan, the City issued a public notice in the Anniston Star on Wednesday, July 3, 2024 to commence the 30-day public comment period and publish the date and time of the public hearing to obtain feedback on the draft plan. The notice identified the 30-day public review period beginning on Wednesday, July 3, 2024 – Monday, August 5, 2024. The City held a public hearing on Thursday, July 18, 2024, to receive public comment on the draft 2024-2025 Action Plan. All comments received were accepted and incorporated into the 2024-2025 Action Plan.

Please see the Appendix section for a listing of all received public comments.

5. Summary of public comments

All comments received will be accepted and incorporated into the 2024-2025 Action Plan. Please see the Appendix section for a listing of all received public comments.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments received were accepted and incorporated into the 2024-2025 Action Plan.

7. Summary

The 2024-2025 program year represents the City's second year of its current Five-Year Consolidated Plan period. During the 2024-2025 program year, the City will receive \$513,533.00 in CDBG and \$288,403.45 in CDBG and HOME funds, respectively, to address the housing, public service and community development needs during the 2024-2025 program year.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	City of Anniston	Community Development
HOME Administrator	City of Anniston	Community Development

Table 1 – Responsible Agencies

Narrative (optional)

Consolidated Plan Public Contact Information

Alisa James, Coordinator
City of Anniston
Community Development
4309 McClellan Blvd.
Anniston, AL 36206
Phone: 256-231-7799
Email: ajames@anniston.al.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Anniston conducted substantial consultation through interviews and focus groups with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care in preparing this plan. City staff and its consultants commenced the planning process by hosting an applications workshop with local stakeholders to solicit feedback from stakeholders and the general public on current needs. The City also distributed public notices in English and Spanish, posted the documents on the City's website, and received public comments. These meetings and other input are summarized in the sections below.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The City of Anniston welcomed and encouraged the participation of all citizens in the development of these plans and in the review of progress in implementing plan activities. The City particularly encouraged involvement by low and moderate-income households residing in areas targeted for program activities for minorities and non-English speaking persons, as well as persons with disabilities. In addition, residents of public housing and other assisted housing are encouraged to participate. A special effort is made to assure that low and moderate-income persons, households in areas assisted by program activities and persons special needs have opportunities to participate.

The City held two public meetings through its public participation process prior to the development of the plan and one public meeting to review the draft priorities. These meetings are summarized in the Citizen Participation Section of this plan. Drafts of the plans have been posted on the City webpage and at Community Development. Notices of public meetings and hearings were published in the local newspaper.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

To enhance the coordination between public and assisted housing providers, private and governmental health/service agencies, the City incorporates the following actions into its Planning process: the Anniston City Council is informed and formally approves of all consolidated planning proceedings; the City attempts to correspond with public and

private agencies that provide CDBG and HOME eligible services to obtain information on current needs; submits invitations to consolidated planning public hearings; incorporates needs information into Consolidated Plan; informs agencies of the availability of funding for projects that will address Consolidated Plan priority needs.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City is a part of the regional Homeless Coalition of Northeast Alabama (HCNEA) Continuum of Care, which includes the City of Anniston and Gadsden and the following counties: Calhoun, Cherokee, DeKalb and Etowah. In consultation to develop this plan, the City consulted with the Continuum to gain access to all CoC data. The City was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the City ensures that CoC goals and the City’s Consolidated Plan priorities are integrated into the plan.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Representatives from the broad community, community councils, social service agencies, businesses, and housing agencies participated in the process. The following agencies attended a workshop.

Agency/Group/ Organization	Agency/Group/ Organization Type	Section of Plan Addressed by Consultation	How Consulted
West Anniston Foundation	Nonprofit	Housing	The City of Anniston requested input from this organization regarding services provided, statistical data and/or specific actions currently underway or being implemented as it pertains to the Consolidated Plan.
The Right Place	Nonprofit	Housing, Homeless Persons	The City of Anniston requested input from this organization regarding services provided, statistical data and/or specific actions currently

			underway or being implemented as it pertains to the Consolidated Plan.
Anniston Housing Authority	Public Housing Agency	Housing	The City of Anniston requested input from this organization regarding services provided, statistical data and/or specific actions currently underway or being implemented as it pertains to the Consolidated Plan.
Federal Communications Commission	Government	Broadband	The City of Anniston requested input from this organization regarding services provided, statistical data and/or specific actions currently underway or being implemented as it pertains to the Consolidated Plan.
Calhoun Cleburne Habitat for Humanity	Nonprofit	Housing	The City of Anniston requested input from this organization regarding services provided, statistical data and/or specific actions currently underway or being implemented as it pertains to the Consolidated Plan.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

The City did not exclude any agency type or agency during this process. For those agencies that believe they were not consulted with or would otherwise like to be included in consultation with the City is encouraged to contact the City’s Community Development Department at (256) 231-7799.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Coalition of Northeast Alabama (HCNEA)	Coordinating homelessness services with Continuum of Care priorities

Table 3 – Other local / regional / federal planning efforts

Narrative (optional):

In accordance with 24 CFR 91.100(4), the City will notify adjacent units of local government of non-housing community development needs included in its Con Plan. The City will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Con Plan and thereby maximize the benefits of the City’s housing and community development activities for the residents being served. Stakeholder meetings included representatives of the Anniston Housing Authority.

Data was collected from the following organization:

- US Department of Housing and Urban Development (HUD)

Combined, these agencies provide housing and supportive services to the community's special needs populations, including persons with disabilities, homeless families and individuals, chronic homeless persons, persons with HIV/AIDS, and the elderly. In addition to many of the agencies listed above many of the groups and agencies that were consulted provided information during the development of the plan.

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

- Posted copies of the draft plans at the City of Anniston Community Development Department. The location of the copies was noted in the final hearing legal advertisement. Posted draft plans electronically on the City website.
- Published all meetings in the local newspaper legal advertisement section.
- Advertised final public hearing schedule in the local newspaper.
- A draft of the Action Plan for FY2024 Annual Action Plan was placed on public display for 30 days beginning Wednesday, July 3, 2024.
- The City held two public hearings on July 18, 2024 to obtain final comments on the proposed Action Plan for FY 2024 on the proposed use of funds for FY 2024.

Citizen Participation Outreach

	Field	Description
1	Mode of Outreach	Newspaper Ad
	Target of Outreach	Non-targeted/broad community
	Summary of Response	Newspaper ad published on July 3, 2024, in the Anniston Star announcing a public participation meeting to receive input on the preparation of the draft 2024-2025 Action Plan.
	Summary of Comments Received	There were no comments received.
	Summary of Comments Not Accepted and Reasons	All comments were accepted.
	URL if Applicable	Not Applicable
	Mode of Outreach	Public Meeting

2	Target of Outreach	Non-targeted/broad community; Non-English Speaking - Specify other language: Spanish; Persons with Disabilities; Residents of Public and Assisted Housing
	Summary of Response	There were no comments received.
	Summary of Comments Received	There were no comments received. Please see Appendix section for all comments received.
	Summary of Comments Not Accepted and Reasons	There were no comments received.
	URL if Applicable	Not Applicable

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Anniston receives CDBG and HOME entitlement funding and Community Development administers the funding for the City. The City of receive \$513,533.00 in CDBG and \$288,403.45 in CDBG and HOME funds, respectively to address the housing, public service and community development needs during the 2024-2025 program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources	Total:		
CDBG	Public - Federal	Admin and Planning Public Improvements Public Services	\$513,533	\$0.00	\$0.00	\$513,533.00	\$0	The primary objective of the CDBG program is to provide decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons and neighborhoods. All prior year funds are committed.
HOME	Public - Federal	Admin and Planning Public Improvements Public Services	\$288,403.45	\$0.00	\$0.00	\$288,403.45	\$0	The intent of the HOME Program is to provide decent affordable housing to low-income households, expand the capacity of nonprofit housing providers, strengthen the ability of state and local governments to provide housing, and leverage private sector participation. All prior year funds are committed.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Anniston a combination of public, including City general fund, and private funding to carry out activities identified in this plan. During this Consolidated Plan period, the City will also seek additional funding streams which are consistent with the goals of the Consolidated Plan. Community Development programs are funded with general funds and CDBG. In addition, the leveraged funding from private and non-federal public sources are as follows:

Matching Requirements

- **CDBG:** The CDBG program does not have a match requirement.
- **HOME:** HUD requires HOME recipients to match 25 percent of their HOME annual allocation in accordance with 24 CFR 92.222. However, certain recipients, such as the City of Anniston, receive a match reduction from HUD due to fiscal distress, severe fiscal distress or Presidential disaster declarations. The City has received a 100 percent match reduction from HUD, and therefore, is not required to match HOME funds using non-federal funds.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City does not anticipate using publicly owned land or property to address the needs identified in the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Affordable Housing Opportunities- Tenant-Based Rental Assistance	2023	2024	Affordable Housing	Citywide	Affordable Housing	\$20,000 HOME	8 Households Assisted
2	Expand Affordable Housing Opportunities- New Construction	2023	2024	Affordable Housing	Citywide	Affordable Housing	\$196,302.59 HOME	1 Homeowner Unit Constructed
3	Public Service – Youth Services	2023	2024	Non-Housing Community Development	Citywide	Increase Capacity of Public Services	\$10,000 CDBG	25 Persons Assisted
4	Public Service – Emergency Housing	2023	2024	Homelessness	Citywide	Increase Capacity of Public Services	\$ 30,000 CDBG	50 Persons Assisted
5	Public Service – Healthcare	2023	2024	Non-Housing Community Development	Citywide	Increase Capacity of Public Services	\$22,000 CDBG	50 Persons Assisted
6	Public Service – General Services Programs	2023	2024	Non-Housing Community Development	Citywide	Increase Capacity of Public Services	\$5,000 CDBG	50 Persons Assisted
7	Public Facility & Infrastructure Improvements – Neighborhood Revitalization and Resilience	2023	2024	Non-Housing Community Development	Citywide	Public Facility & Infrastructure Improvements	\$316,326.40 CDBG	100 Persons Assisted
8	Planning & Administration	2023	2024	Planning and Admin	Citywide	Planning & Admin	\$102,706.60 CBDG \$28,840.34 HOME	Other

Table 6 – Goals Summary

Annual Action Plan

Goal Descriptions

Sort Order	Goal	Goal Description
1	Expand Affordable Housing Opportunities- Tenant-Based Rental Assistance	Provides funding for rental subsidies to low-wage earners who live and work in the City.
2	Expand Affordable Housing Opportunities- New Construction	Provides for-profit and nonprofit organizations with gap financing for acquisition, relocation, and demolition to support affordable housing development for low-income households at 80% or below AMFI. Eligible costs may include but are not limited to predevelopment, relocation, demolition, acquisition, and related costs.
3	Public Service – Youth Services	Provides after-school and summer activities for low-income children and youth (ages 6-18), Monday through Friday. Youth participate in structured recreational, cultural, social, and life skill activities in an adult-supervised, safe, clean environment. Funds will be used to provide salary support.
4	Public Service – Emergency Housing	Provides services for homeless individuals and families to support emergency shelter and permanent housing solutions.
5	Public Service – Healthcare	Provides services for uninsured residents to receive healthcare services. Funds will be used to provide salary support.
6	Public Service – General Services Programs	Fund projects that provide recreational activities, food support, educational opportunities, and job skills to youth; supportive services to low- and moderate-income households and persons with special needs; assistance to businesses to create and/or retain jobs for low- and moderate-income persons; and support for job training, continuing education, and employment services designed to assist low- and moderate-income persons obtain jobs.
7	Public Facility & Infrastructure Improvements	The City will fund projects that improve drainage and infrastructure to enable resilient design and withstand future community growth and investment.
8	Provide Administrative Structure	Provide Administrative Structure

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects planned for the 2024 program year are identified in the table below, with additional detail provided in AP-38. Over the next year, the City of Anniston anticipates using CDBG funds demolish and remove blighted, substandard structures, public infrastructure projects, and to support the provision of public services aimed at utility assistance, healthcare, emergency rental assistance, summer youth programs, and fair housing. The City will also use HOME funds to provide tenant-based rental assistance and to construct new housing.

Projects

#	Project Name
1	All Saints for Concern – Community Utility Assistance
2	St. Michael’s Place Medical Center – Healthcare Access Expanded
3	Boys & Girls Clubs of East Central Alabama – Power Hour
4	Interfaith Ministries – Emergency Assistance
5	The Right Place for Housing and Support – Supportive Services
6	Fair Housing Center of Northern Alabama – Fair Housing and Outreach
7	City of Anniston Code Enforcement - Blight Removal of Substandard and Dangerous Structures
8	World Changers – Owner Occupied Minor Home Rehabilitation
9	City of Anniston – Planning & Administration
10	City of Anniston Public Works – Infrastructure Improvements in LMA
11	

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The projects were selected to meet identified needs in the community with the resources provided. The greatest obstacle to meeting the City’s underserved needs is limited financial resources. Anniston will continue to estimate allocations for this Consolidated Plan period based on the final allocation amount and the priorities identified in the PY2023-2027 Consolidated Plan, community input, qualified applications for funding, Community Development Department and City Council. The City recognizes there are multiple needs for low and moderate-income persons of the City that are met through the use of CDBG and HOME funds. These needs include access to affordable housing for low and moderate-income persons, services for homeless and at-risk populations; increased

capacity for public services and addressing community development needs. The City prioritizes grant allocations by ensuring that all proposed projects will:

- Directly benefit low and moderate-income persons or households as defined by HUD's Income Limit Guidelines based on the Anniston-Oxford-Jacksonville Metropolitan Statistical Area (MSA); or
- Take place in an area where more than 51% of the population is lower income according to HUD Income Limits.

AP-38 Project Summary

Project Summary Information

1	Project Name	City of Anniston Building & Safety Division – Demolition/Blight Removal of Substandard Structures
	Target Area	Citywide
	Goals Supported	Demolition and Clearance of Blighted Structures
	Needs Addressed	Neighborhood Redevelopment/ Facility Improvements in Low-Mod Areas
	Funding	CDBG: \$150,000.00
	Description	The City will demolish blighted, substandard structures throughout the City of Anniston.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 structures will be demolished.
	Location Description	Citywide – City Hall -4309 McClellan Blvd, Anniston, AL 36202
	Planned Activities	The City will identify and demolish blighted, substandard structures throughout the City of Anniston.
2	Project Name	Fair Housing Center of Northern Alabama
	Target Area	Citywide
	Goals Supported	Public Service – Fair Housing Educations & Outreach
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$5,000
	Description	The program provides fair housing education and outreach.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The Fair Housing Education & Outreach programs will serve 100 persons.
	Location Description	1820 7th Ave N, Birmingham, AL 35203
	Planned Activities	CDBG funds will be used to offset administrative costs by providing salary support for staff who provide fair housing education and outreach.

3	Project Name	St. Michael's Clinic – Healthcare for the Underserved Expanded
	Target Area	Citywide
	Goals Supported	Public Service – Healthcare Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$22,000.00
	Description	The program provides basic healthcare services for uninsured individuals.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The Healthcare for Underserved program will serve 50 persons.
	Location Description	1005 W 18th St, Anniston, AL 36201
	Planned Activities	CDBG funds will be used to offset administrative costs by providing salary support for staff who provide healthcare services for the uninsured.
4	Project Name	Interfaith Ministries – Emergency Assistance
	Target Area	Citywide
	Goals Supported	Public Service – Emergency Housing
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$10,000.00
	Description	Emergency housing assistance for the homeless.
	Target Date	9/30/2025
Estimate the number and type of families that will benefit from the proposed activities	The Emergency Housing Assistance program will serve 30 persons.	
5	Project Name	All Saints Interfaith Center of Concern – Emergency Utility Assistance
	Target Area	Citywide
	Goals Supported	Public Service – Emergency Housing
	Needs Addressed	Increase Capacity of Public Services

	Funding	CDBG: \$10,000.00
	Description	Provides utility assistance for individuals and families who cannot pay basic utilities.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The Emergency Utility Assistance program will serve 40 persons.
	Location Description	1513 Noble St, Anniston, AL 36201
	Planned Activities	CDBG funds will be used to offset administrative costs by providing salary support for staff who provide emergency utility assistance for families in need.
6	Project Name	The Right Place for Housing and Support – Supportive Services
	Target Area	Citywide
	Goals Supported	Public Service – Emergency Housing
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$10,000.00
	Description	The program provides supportive services homeless individuals seeking permanent housing.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The supportive services program will serve 20 households.
	Location Description	105 W 15th St, Anniston, AL 36201
Planned Activities	CDBG funds will be used to offset administrative costs by providing salary support for staff who provide services for homeless individuals seeking permanent housing.	
7	Project Name	Boys & Girls Clubs of East Central Alabama – Power Hour – Making Every Minute Count
	Target Area	Citywide
	Goals Supported	Public Service – Youth Services
	Needs Addressed	Increase Capacity of Public Services
	Funding	CDBG: \$10,000.00
	Description	CDBG funds will be used to provide after-school programming.
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	The program will provide afterschool programming for 40 City of Anniston youth.
	Location Description	920 Noble St, Anniston, AL 36201
	Planned Activities	CDBG funds will be used to provide after school programming for youth in the City of Anniston.
8	Project Name	City of Anniston Public Works – Infrastructure Improvements in LMI Neighborhoods
	Target Area	Citywide
	Goals Supported	Infrastructure and Street Improvement Improvements
	Needs Addressed	Neighborhood Redevelopment/ Facility Improvements in Low-Mod Areas
	Funding	CDBG: \$159,326.40
	Description	The City will improve infrastructure in low-income neighborhoods.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This development will be determined.
	Location Description	City Hall - 4309 McClellan Blvd, Anniston, AL 36202
	Planned Activities	CDBG funds will be used to pay for costs associated with infrastructure improvements.
9	Project Name	City of Anniston Administration - CDBG
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	\$102,706.60
	Description	Planning and Administration costs determined-by and subject-to 20% federally mandated spending cap.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	City Hall - 4309 McClellan Blvd, Anniston, AL 36202
	Planned Activities	Planning and Administration costs determined by and subject to 20% federally mandated spending cap.
10	Project Name	World Changers – Owner Occupied Minor Home Rehabilitation

	Target Area	Citywide
	Goals Supported	Preserving Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	\$7,500.00
	Description	The program will provide minor home repair for homeowners in need of housing rehab.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 2 clients.
	Location Description	1800 Wilmer Avenue , Anniston, AL, United States, 36201
	Planned Activities	The program will provide rental subsidies for families in need.
11	Project Name	The Right Place Inc - TBRA Rental Assistance
	Target Area	Citywide
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	\$20,000.00
	Description	The program will provide rental subsidies for families in need.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 8 clients.
	Location Description	105 W 15th St, Anniston, AL 36201
	Planned Activities	The program will provide rental subsidies for families in need.
12	Project Name	Housing Development Corporation - New Construction
	Target Area	Citywide
	Goals Supported	Expand Affordable Rental Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	\$196,302.59
	Description	Housing Development Corporation will construct new housing for income-eligible families.
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Developer will construct 1 new house for income-eligible families.
	Location Description	To be determined
	Planned Activities	Housing Development Corporation will construct 1 new house for income-eligible families.
13	Project Name	City of Anniston Administration - HOME
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	\$28,840.34
	Description	Planning and Administration costs determined-by and subject-to 10% federally mandated spending cap.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	City Hall - 4309 McClellan Blvd, Anniston, AL 36202
	Planned Activities	Planning and Administration costs are determined-by and subject-to 20% federally mandated spending cap.
14	Project Name	City of Anniston - CHDO 15% Set-Aside
	Target Area	Citywide
	Goals Supported	Expand Affordable Housing Opportunities
	Needs Addressed	Affordable Housing
	Funding	\$43,260.34
	Description	The City will identify and use set-aside funds to expand affordable housing opportunities.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	City Hall - 4309 McClellan Blvd, Anniston, AL 36202
	Planned Activities	The City will identify and use set-aside funds to expand affordable housing opportunities.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed .

The City of Anniston receives entitlement program funds directly from HUD and assistance will be provided throughout low-income census tracts and directly to low and moderate-income residents.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	80%

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Anniston’s low and moderate-income population is not necessarily concentrated in one certain area therefore the City’s rationale for the priorities for allocating investments will be assessed citywide to ensure equal access to funds. The City utilizes the American Community Survey, HUD’s low and moderate-income summary data, and Federal Financial Institutions Examinations Council’s (FFIEC) data to determine low-mod percentages. Federal grant resources will be allocated City-wide based on low-mod areas which often coincide with areas of minority concentration.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Anniston with its nonprofit partners will provide affordable rental assistance and housing services. The special needs population will be served through local service providers. The homeless population will be served through the Continuum of Care. The goals below are estimates based on the 2024 program year.

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	300
Special-Needs	50
Total	500

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	0
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	30

Table 10 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of the City of Anniston, also known as the Anniston Housing Authority (AHA), was established in 1938. The AHA's mission is to serve the needs of low-income persons in the Anniston Housing Authority jurisdiction by taking steps to promote adequate and affordable housing, promote economic opportunity, and promote a suitable living environment without discrimination. The Housing Authority of the City of Anniston administers public housing located at Barber Terrace, Constantine Homes, Fairview Terrace, Glen Addie Homes, Hobson City, Norwood Homes, Parkwin Homes, Tinsley Manor, and Washington Homes. The city also administers the Section 8 Housing Choice Voucher Program.

Actions planned during the next year to address the needs to public housing.

The City of Anniston and the HOME Consortium will partner to provide HOME funding to the AHA's Community Development Corporation for the development and new construction of affordable rental housing dedicated for low income households.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Anniston Public Housing Authority distributes information to PHA residents regarding fair housing, homeownership, and rental opportunities for affordable housing rehabilitated with CDBG or HOME funds and constructed with HOME funds.

The AHA operates a resident council program that will provide for unified input into policies and practices of the organization and future planning. The objective of the Council is to review the effectiveness of housing authority policies and practices, make recommendations for expanded tenant services and activities, and have input into the redevelopment plans of the housing authority. Resident leaders make up the Anniston Housing Authority's Executive County and Advisory Board who represent various communities within the AHA.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Anniston Housing Authority is not designated as a "troubled" Public Housing Authority.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City actively participates in the regional CoC serving northeast Alabama, provides funding support to address service needs, and coordinates care with local service providers addressing homeless needs. The City of Anniston is a participating jurisdiction in the Homeless Coalition of Northeast Alabama (HCNEA). The Community Development Coordinator for the city attends Coalition meetings to ensure that collaborative efforts occur between the city and the coalition. The City of Anniston's Annual Action Plan provides funding support for agencies providing services to the homeless. The identified projects target homeless individuals and families who lack the resources to regain stable housing independently. Programs are designed to connect clients with the services necessary to ensure their move from emergency shelter to transitional or permanent housing.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

The City of Anniston is not a direct recipient of Emergency Solutions Grant (ESG) funds however, many of the City's local nonprofits receive ESG funding from the Alabama Department of Economic and Community Affairs (ADECA) to provide Emergency Shelter, Rapid Rehousing, and Homelessness Prevention activities for homeless families. The City will continue to fund projects through its CDBG program that benefits homeless households in the City. The funded projects are designed to help shorten the length of time the client experiences homelessness, improve their ability to secure stable housing, and prevent recurrent homeless episodes. Wrap-around/supportive services have been identified as a more efficient strategy in reducing reoccurring periods of homelessness.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City supports the initiatives of Homeless Coalition to address the housing and supportive services of homeless people. The Community Development Department of the City of Anniston makes regular referrals of homeless individuals to the Homeless Coalition, which refers to these individuals to agencies serving the homeless and provide housing. There are times when no vacancies are available for longer-term needs. The Homeless Coalition helps assess the individual needs of each family place them in the best housing situation for their circumstances. Over the next Consolidated Plan period, the City plans to continue collaborating with various local nonprofits organizations to

expand services for the homeless and at-risk of homelessness population.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Anniston will continue to support local nonprofits such as The Right Place, St. Michael's Clinic, and All Saints Interfaith Center addressing transitional housing. Although the City of Anniston does not receive its ESG allocation, the city maintains steady support by leveraging its CDBG allocation to provide foundational support to these organizations. These organizations are eligible to receive ESG support through the State of Alabama who receives a direct allocation to provide essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Calhoun County, including Anniston, to include homeless families, single men and women, and survivors of domestic violence. The City and County support are increasing housing options and self-sufficiency for the homeless and near-homeless by supporting transitional housing where appropriate.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City regularly collaborates with the Homeless Coalition of Northeast Alabama to help individuals, children, and families facing housing crises. The City works closely with CoC member organizations to provide foundational support for these organizations to be able to continue to provide needed services to the residents of the Anniston community. The coordination between the City and the regional CoC is imperative to assess the needs of homeless and low-income families in avoiding homelessness, addresses the emergency shelter and transitional housing needs, and helps both homeless and chronically homeless make the transition to permanent housing and independent living. The need for transitional and permanent housing is critical in the City of Anniston.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies

that address housing, health, social services, employment, education, or youth needs.

Public systems or institutions (i.e., jails, prisons, hospitals, child welfare, mental health facilities, etc.) often release individuals directly into homelessness. For homeless families with children, a centralized intake is in place that seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. The Homeless Coalition of Northeast Alabama Board of Directors will continue to work closely with jails and hospitals to make sure that hospital social workers have appropriate discharge protocols and are not routinely discharging patients to the streets or emergency shelter.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City conducted its Analysis of Impediments to Fair Housing Choice (AI) in 2023. As part of that process, the City and its stakeholders who participated in the process identified several contributing factors that create barriers to affordable housing and opportunities. The City's AI identified several contributing factors that create barriers to affordable housing and opportunities such as:

- Lack of state or local fair housing law
- Lack of availability of affordable accessible units in a range of types
- Availability of accessible units in publicly supported housing

While the City has taken steps towards limit barriers to affordable housing, such as adopting Zoning Ordinances that allow for mixed-use and increased density building within the city in its AI; the goals and action steps to increase affordable housing options in high opportunity areas.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

The City will continue to work with local organizations to identify opportunities for housing initiatives. For the coming year, the City will continue to carry out the implementation of its rental housing assistance program and development of affordable rental housing. The City will also continue its baseline housing and community development services as a means of fostering and maintaining decent and affordable housing.

AP-85 Other Actions – 91.220(k)

HUD requires grantees to ensure that these grant funds are used to address underserved needs, affordable housing, lead-based paint hazards, poverty-stricken families, the institutional structure for the delivery of services to families in need, and the coordination of services. The paragraphs below outline how the city intends to meet those needs.

Actions planned to address obstacles to meeting underserved needs

The City will use HOME funds and a portion of CDBG funds for new affordable housing initiatives and rehabilitate existing housing units. The special needs population will be served through grants to local service providers. The homeless population will be served through assistance grants to local service providers.

Actions planned to foster and maintain affordable housing

As the lead entity for the Anniston HOME Consortium, the City of Anniston will continue to commit HOME funds and other resources to address the large gap in affordable rental units by developing or rehabbing existing units and providing subsidies to income-qualified families.

Actions planned to reduce lead-based paint hazards

According to the 2023 American Community Survey, 78% of Anniston's housing units were built before 1978. To address lead-based paint hazards, the City adheres to the Residential Lead-Based Paint Hazard Reduction Act of 1992 in federally assisted housing. The City requires disclosure of known information on lead-based paint hazards before the sale or lease of housing built before 1978. The City also implemented city codes and regulations to protect its citizens from lead-based paint hazards, which is integrated through purchasing policies and code enforcement.

The City has hired a contractor to provide lead testing, risk assessments, and remediation/abatement services. Their services will be used as needed, determined by the age, condition, and presence of lead-based paint as determined by a certified Lead Assessment professional. Lead safe work practices will be adhered to as applicable for housing rehabilitation, public facility improvements, and demolition/clearance of vacant and abandoned dilapidated housing units.

Actions planned to reduce the number of poverty-level families

Poverty-reducing goals, programs, and policies are coordinated with the housing plan by using the City's Department of Community Development to administer both CDBG and HOME. This structure ensures continuity and that poverty-reducing activity implemented

under CDBG is provided in conjunction with housing-related efforts and decisions. Ongoing communication between the City and non-housing and housing service providers will support such efforts.

Actions planned to develop an institutional structure

The City of Anniston will use the Community Development Department as the lead agency for program planning, management, coordination, and administration of the Community Development Block Grant Program and HOME Investment Partnerships Program. The Community Development Department works as the housing and community development liaison between County agencies, local public housing, participating cities, state agencies, and nonprofit and community-based organizations.

Actions planned to enhance coordination between public and private housing and social service agencies

The Community Development Department encourages collaborative relationships with subrecipients to develop wrap-around services for clients being served. Relationship building among these social services and housing agencies encourages referrals, creating the appropriate case management to move clients from homelessness, through to emergency shelter and transitional housing services, to affordable rental housing and homeownership opportunities. Ultimately, this collaborative approach assists in developing longer-term, sustainable solutions to the challenges clients face in maintaining self-sufficiency.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

**Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Description	Amount
1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

Description	Amount
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds will be used for activities that benefit persons of low and moderate-income. Overall Benefit - A consecutive period of one (2024), two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate-income. Specify the years covered that include this Annual Action Plan.	80

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Anniston will utilize investment of HOME program funds as designated in CFR part 92.205(b). The consortia will provide HOME Program funds to eligible affordable housing agencies to assist low-income residents.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements HOME grantees must use for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The resale or recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

When undertaking HOME-assisted homebuyer activities, including projects funded with HOME program income, the City must establish resale or recapture provisions that comply with HOME statutory and regulatory requirements and set forth the provisions in its Consolidated Plan. HUD must determine that the provisions are appropriate. The written resale/recapture provisions that the City submits in its Annual Action Plan must clearly describe the terms of the resale/recapture provisions, the specific circumstances under which these provisions will be used, and how the City will enforce the provisions.

Note: The City of Anniston's complete Resale and Recapture provisions are included as an appendix.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City's resale and recapture provisions ensure the affordability of units acquired with home funds in several ways.

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. The City's calculation for the period of affordability is based upon the amount of HOME assistance in each unit and the applicable period of affordability under resale or recapture provisions.

a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a) (5) (i) the HOME rule states that the period of affordability is based on the total amount of HOME funds invested in the housing. In other words, the total HOME funds expended for the unit determines the applicable affordability period. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded direct subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability period:

If the total HOME investment (resale) or Direct Subsidy (recapture) in the unit is:	The Period of Affordability is:
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

Minimum Affordability Periods

- Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not anticipate refinancing any existing debt with its HOME funds during the 2024 Annual Action Plan year.

- If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable.

- If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR

92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable.