

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 9/30/2027
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

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

A.	PHA Information.										
A.1	PHA Name: <u>Housing Authority of the City of Glendale</u> PHA Code: <u>CA114</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2026</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>1652</u> PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission Public Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. How the public can access this PHA Plan: Housing Department Front Counter, 141 N Glendale Ave #202, Glendale, Ca 91206 Online at: www.glendaleca.gov/government/departments/community-development/housing/housing-section-8-program. The plan is also available by emailing: Edgar Akopyan at eakopyan@glendaleca.gov ☐ PHA Consortia: (Check box if submitting a joint Plan and complete table below) <table border="1"> <thead> <tr> <th>Participating PHAs</th><th>PHA Code</th><th>Program(s) in the Consortia</th><th>Program(s) not in the Consortia</th><th>No. of Units in Each Program</th></tr> </thead> <tbody> <tr> <td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program					
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B.	Plan Elements.										
B.1	Revision of Existing PHA Plan Elements. a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission? Y N ☐ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs.										

- ☐ ☒ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☒ ☐ Financial Resources.
☐ ☒ Rent Determination.
☒ ☐ Operation and Management.
☐ ☒ Informal Review and Hearing Procedures.
☐ ☒ Homeownership Programs.
☐ ☒ Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
☐ ☒ Substantial Deviation.
☐ ☒ Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

Financial Resources:

Financial Resources Required to Fully Fund All Programs

Programs	Total Vouchers	Funding
Glendale HCV Voucher HAP		\$30,891,168
Glendale HCV Admin Fee		\$2,380,479
Glendale HCV Total	1,592	\$33,271,647
VASH HAP		\$261,900
VASH Admin Fee		\$29,250
VASH Total	15	\$291,150
Mainstream Voucher (MSV)		\$272,160
MSV Admin Fee		\$27,300
MSV Total	14	\$299,460
Fair Share Voucher (FSV)		\$918,540
FSV Admin Fee		\$87,750
FSV Total	45	\$1,006,290
Port HAP		\$18,696,000
Port Admin Fee		\$1,106,712
Port Total	950	\$19,802,712
Total HAP		\$51,039,768
Total Admin Fee		\$3,631,491
GRAND TOTAL	2,616	\$54,671,259

Operation and Management:**Projected Early Depletion of Emergency Housing Voucher (EHV) Program Funding****Background of the EHV Program:**

The Emergency Housing Voucher (EHV) Program was established in 2021 under the American Rescue Plan Act of 2021 in response to housing instability associated with the COVID-19 pandemic. The program was designed as a temporary initiative with funding originally projected through 2030. Through this effort, the U.S. Department of Housing and Urban Development (HUD) allocated approximately 70,000 tenant-based vouchers nationwide to assist households experiencing homelessness, those at risk of homelessness, and individuals fleeing domestic violence. The Glendale Housing Authority (GHA) received an allocation of 225 vouchers. While the full allocation was initially leased, the program currently serves 188 households due to natural attrition.

Shift in Timeline and Current Program Status:

Despite the original funding horizon of 2030, updated national projections indicate that EHV program funds are expected to be depleted by calendar year 2026. The earlier than expected depletion of funds is largely attributable to rapid initial lease-up rates and higher-than-anticipated rent subsidies driven by rising housing costs nationwide.

EHV Program Outlook in Glendale:

Increased subsidy costs have affected both the EHV and the regular Housing Choice Voucher program. Increased expenditures have contributed to the Section 8 program entering shortfall status and temporarily suspending leasing from the waiting list. Under current financial conditions, the GHA does not have the capacity to absorb EHV participants into the regular voucher program.

GHA Response:

In preparation for the projected loss of EHV funding, the GHA has notified participants to support advance planning. The GHA will coordinate closely with the Homeless Continuum of Care (CoC) Program to identify and pursue alternative housing resources. At the same time, the GHA is expanding service partnerships, including collaboration with Gateways Hospital and Mental Health Center to provide targeted case management for participants with behavioral health needs.

In addition, the GHA continues to advocate for supplemental EHV funding at the state and federal levels through its participation in professional housing organizations, including National Association of Housing and Redevelopment Officials (NAHRO), California Association of Housing Authorities (CAHA), and Public Housing Authorities Directors Association (PHADA).

B.2 New Activities.

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

Y N

☐ ☒ Project-Based Vouchers

(b) If Project-Based Voucher (PBV) activities are planned for the applicable Fiscal Year, provide the projected number of PBV units and general locations, and describe how project-basing would be consistent with the PHA Plan.

B.3 Progress Report.

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

- 1) **Optimize Leasing and Subsidy Allocation:** Maintain a balanced leasing rate to maximize program participation while ensuring sufficient rent subsidies are provided for Section 8 applicants and recipients to afford decent, safe, and sanitary housing.

Progress Report: Since December 2024, the GHA has operated in shortfall status due to expenditures exceeding the available budget authority. During this period, the GHA has successfully applied for and received shortfall funding from HUD to ensure continued payment of housing assistance subsidies for existing participants. However, as a condition of receiving this funding, HUD has restricted the GHA from leasing new applicants from the waiting list. As a result, leasing activity has been halted, and the GHA has been unable to fully utilize its HUD-authorized voucher allocation. (see Voucher Allocation and Utilization Summary below).

<i>Voucher Allocation and Utilization Summary</i>			
<i>Voucher Program</i>	<i>Voucher Allocation</i>	<i>Vouchers Under Lease</i>	<i>Unfunded Vouchers</i>
<i>Glendale HCV</i>	<i>1592</i>	<i>1377</i>	<i>215</i>
<i>Fair Share</i>	<i>45</i>	<i>38</i>	<i>7</i>
<i>Mainstream</i>	<i>14</i>	<i>12</i>	<i>2</i>
<i>Total</i>	<i>1651</i>	<i>1427</i>	<i>224</i>

- 2) **Achieve High Performer Designation in SEMAP:** Strive to achieve and maintain a “High Performer” designation in HUD’s Section Eight Management Assessment Program (SEMAP).
Progress Report: For FY2024-2025, the GHA earned a High Performer designation in HUD’s Section Eight Management Assessment Program (SEMAP), earning a perfect score of 130 out of 130 possible points.
- 3) **Update Administrative Plan Policies:** Regularly review and update policies in the Administrative Plan to implement regulatory and policy changes in a timely manner.
Progress Report: The GHA conducted a review of its Administrative Plan and updated program policies to reflect recent HUD regulatory changes. The revised Administrative Plan is scheduled to take effect on June 1, 2026.
- 4) **Review and Update Payment Standards:** Periodically review and update payment standards to ensure they remain within 90 to 110 percent of Small Area Fair Market Rents (SAFMRs) and are sufficient to enable Section 8 applicants and recipients to afford decent, safe, and sanitary housing.
Progress Report: In 2025, the GHA reviewed and updated its payment standards in compliance with HUD requirements to remain within 90 to 110 percent of Small Area Fair Market Rents (SAFMRs). Due to current budgetary constraints, median payment standards were established at 93 percent of SAFMRs. While set toward the lower end of the allowable range, the payment standards continue to support participant leasing activity and enable households to secure decent, safe, and sanitary housing, as demonstrated by ongoing participant moves.
- 5) **Maintain Housing Quality:** Ensure Section 8 units meet HUD’s standards for being decent, safe, and sanitary.
Progress Report: From July 1, 2025, through January 31, 2026, the GHA conducted a total of 1,445 Housing Quality Standards (HQS) inspections to ensure Section 8 units met HUD requirements for decent, safe, and sanitary housing. In addition, supervisory Quality Control inspections were performed to verify inspection accuracy and ensure consistent application of HUD standards.
- 6) **Maintain Internal Controls:** Maintain robust internal controls to reduce errors in rent determinations.
Progress Report: The GHA implemented ongoing Quality Control reviews of Section 8 participant files to verify the accuracy and regulatory compliance of rent determinations. As part of internal controls, all rent determinations completed by newly trained staff were subject to 100 percent supervisory review during the training period. In addition, proposed rent increases were reviewed to confirm that rents were reasonable and comparable to similar units in the community.
- 7) **Provide Training Opportunities for Section 8 Staff:** Offer professional and internal training on HUD regulations, policies, and procedures to ensure program compliance and the adoption of industry best practices in administering the Section 8 program.
Progress Report: The GHA provided professional and internal training opportunities to Section 8 staff to support program compliance and the adoption of industry best practices. Management-level staff participated in the following external training courses and conferences:
 - **Emphasys Engage 2025**, hosted by Emphasys, which included training on Small Area Fair Market Rents (SAFMRs), voucher program updates, portability, and system functionality.
 - **PHA Operations for New Executive Leaders**, offered by National Association of Housing and Redevelopment Officials (NAHRO), covering budgets and operating subsidies, capital funds, ACOPs and Administrative Plans, waiting lists, program decision-making, and human resources.
 - **HCV Portability**, offered by NAHRO, providing detailed guidance on portability eligibility, roles of initial and receiving PHAs, required documentation, and special portability considerations under VAWA, reasonable accommodations, and VASH.
 - **HCV Financial Management**, offered by Nan McKay and Associates, Inc., focusing on budgeting,

cash management, financial reporting, and HUD compliance requirements.

- **SEMAP Self-Assessment**, offered by Nan McKay and Associates, Inc., providing guidance on conducting internal assessments of SEMAP compliance.

In addition, senior staff provided comprehensive in-house training to newly hired Section 8 caseworkers, with 100 percent quality control review of their work conducted throughout the training period.

- 8) **Pursue New Funding Opportunities and Additional Vouchers:** Apply for new Notices of Funding Availability (NOFAs) and advocate for additional vouchers to expand affordable housing programs whenever opportunities arise.

Progress Report: During this fiscal year, no new Notices of Funding Availability (NOFAs) or voucher expansion opportunities applicable to the GHA were issued. The GHA continued to advocate for additional vouchers and expanded affordable housing resources through its participation in regional, state, and national housing organizations (see Item #12).

- 9) **Enhance Portability Processes:** Maintain a streamlined portability transfer processes, enabling families to be issued vouchers, search for units, and lease up in their desired neighborhoods as quickly as possible.

Progress Report: The GHA maintained a streamlined portability process designed to facilitate timely voucher issuance, unit search, and lease-up for port-in families. A single point of contact was designated for all incoming portability cases, promoting consistent communication and efficient processing. Port-in participants received vouchers promptly, and once suitable units were identified, inspections were scheduled and completed expeditiously, allowing households to move in while lease-up documentation was finalized with property owners.

- 10) **Perform Payment Reconciliations:** Conduct periodic reconciliations of incoming portability housing assistance payments to ensure accuracy and accountability.

Progress Report: A designated staff member conducts ongoing reconciliations of incoming portability housing assistance payments for vouchers administered by the GHA to verify accuracy and maintain financial accountability.

- 11) **Process Waiting List Updates Promptly:** Ensure timely processing of applicant-reported updates for the Section 8 waiting list to facilitate quicker qualification when applicants are pulled from the list.

Progress Report: The GHA processed applicant-reported waiting list updates promptly upon receipt to ensure that current and accurate information was used when determining preference points and applicant eligibility at the time of selection.

- 12) **Participate in Housing Organizations:** Maintain membership and active participation in housing organizations to stay informed about regulatory updates, industry trends, and best practices.

Progress Report: The GHA maintained active membership and participation in professional housing organizations to remain informed of regulatory updates, industry trends, and best practices. During the reporting period, the GHA participated in the following organizations:

- National Association of Housing and Redevelopment Officials (NAHRO)
- Southern California National Association of Housing and Redevelopment Officials (So-Cal NAHRO)
- California Association of Housing Authorities (CAHA)
- Public Housing Authorities Directors Association (PHADA)
- Southern California Association of Nonprofit Housing (SCANPH)

- 13) **Conduct Marketing and Outreach:** Conduct program marketing and landlord outreach events to attract new property owners to the Section 8 program while maintaining strong relationships with existing landlords.

Progress Report: On May 29, 2025, the GHA hosted an Owner Appreciation and Outreach Event designed to strengthen relationships with existing property owners and promote participation in the Section 8 program among prospective landlords. The event, held at Forest Lawn Museum, included a museum tour and provided opportunities for property owners to engage directly with Housing staff and City officials regarding program participation and benefits.

- 14) **Strengthen Partnerships with Glendale Continuum of Care (CoC) Agencies:** Collaborate with the Glendale Continuum of Care (CoC) and its partner agencies to support Section 8 participants with special needs, ensuring program compliance and long-term housing stability.

Progress Report: The GHA collaborated closely with the Glendale Continuum of Care (CoC) partner agencies to support participants with complex and special needs. CoC partner staff conducted in-person wellness checks, assisted with required documentation, and provided support to address sanitary and housing stability challenges, helping ensure continued program compliance and participant well-being.

In addition, the GHA is expanding its partnerships with external service providers to strengthen long-term housing stability, particularly in preparation for the Emergency Housing Voucher (EHV) program winddown.

	The GHA is in the process of finalizing a contract to fund a dedicated case manager position with Gateways Hospital and Mental Health Center. The case manager will collaborate with Housing and Homeless Services staff to provide intensive mental health support, daily case management, and care coordination aimed at improving housing stability for participants with behavioral health needs.
B.4	B.4 Capital Improvements. - Not Applicable
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y ☐ N ☒ N/A ☐ (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan? Y ☒ N ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. RAB members expressed the need for continued focus on affordable housing in Glendale and asked questions regarding program funding, rent determinations, rent increases, waiting list status, and the status of the Emergency Housing Voucher (EHV) program. No specific recommendations were made. See attached meeting minutes.
C.2	Certification by State or Local Officials. Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y ☒ N ☐ (b) If yes, include Challenged Elements. The Housing Authority received public comments, including formal challenges to the PHA Plan submitted by Ani Khash via emails (attached) on the following dates: May 1, 2026 and May 4, 2026. The challenges and the Housing Authority's responses are set forth below. 1. Challenge: Financial resources — 903.7(d): The plan's associated bridge funding strategy relies on \$3,700,000 in HOME funds that the City's own planning documents state cannot be deployed without a Consolidated Plan amendment and HUD concurrence that have not been initiated, and on \$434,000 in Measure A funds that may already be committed to an existing contract. Response: The City will undergo the substantial amendment process, including public comment period and public hearing in line with its Citizen Participation Plan prior to submitting the substantial amendment to HUD for the creation of a TBRA program. 2. Challenge: Consistency with the Consolidated Plan — 903.23(a)(3): The 2025–2030 Consolidated Plan states the City "does not plan to utilize HOME funds for Tenant Based Rental Assistance (TBRA)." No Consolidated Plan amendment has been adopted. The plan is inconsistent with the applicable Consolidated Plan. Response: At the time the Consolidated Plan was created, the City did not have plans to administer a TBRA program. Now that the staff has received direction from the City Council and the Housing Authority to create one, the City will undergo the substantial amendment process, including opening a public comment period and conducting a public hearing in line with its Citizen Participation Plan prior to submitting the substantial amendment to HUD for the creation of a TBRA program. 3. Challenge: AFFH certification — 903.7(o): The plan contains no transition mechanism for 188 EHV households disproportionately composed of disabled individuals, domestic violence survivors, elderly households, and racial/ethnic minorities. Six peer agencies (Long Beach, Pasadena, Burbank, Anaheim, Berkeley, Santa Monica) adopted the PIH 2025-19 EHV transition preference. Glendale deferred. The disparate impact of this deferral on protected classes has not been analyzed or addressed in the plan. Response: The anticipated sunset of the EHV program is the result of the elimination of federal funding and is not a discretionary local action. The Housing Authority is operating within a HUD-identified funding shortfall and is not in a position to absorb EHV participants into the Housing Choice Voucher program, therefore it has not utilized the provisions in PIH notice 2025-19. The City Council and Housing Authority Board considered the option of placing EHV participants on the Section 8 waiting list but elected to defer that action pending greater certainty regarding the availability of additional federal or state funding. In response to the anticipated loss of EHV assistance, the City has developed a transition strategy utilizing non-HCV funding sources to mitigate impacts to affected households to the extent feasible. 4. Challenge: Housing needs — 903.7(a): The plan does not adequately address the housing needs of 188 EHV households facing imminent loss of assistance, including extremely low-income families, elderly households, disabled individuals, and domestic violence survivors, as required by 903.7(a)(1)(i)–(iii). Response: The Annual Plan actions reflects current program conditions, including the anticipated sunset of the EHV program due to the elimination of federal funding. The Housing Authority is operating within a HUD-identified funding shortfall and is not in a position to absorb EHV participants into the Housing Choice Voucher program. The City Council and Housing Authority Board have considered the option of placing EHV participants on the Section 8 waiting list but elected to defer that action pending greater certainty regarding the availability of additional federal or state funding for the EHV program.
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In response to the anticipated loss of EHV assistance, the City has developed a transition strategy utilizing non-HCV funding sources to mitigate impacts to affected households to the extent feasible.

5. **Challenge:** RAB consultation — 903.13: The February 25, 2026 RAB meeting lasted 38 minutes, included an orientation for new members, did not produce written recommendations, did not include documented EHV household representation, and the HUD-50075 certification may predate the RAB meeting. The RAB meeting materials were not posted.

Response: The Housing Authority convened a Resident Advisory Board (RAB) meeting on February 25, 2026, during which staff presented key components of the Annual Plan and a summary of the Administrative Plan. RAB members were provided access to review these materials and were given the opportunity to ask questions and provide input.

The duration of the meeting was driven by member questions and discussion, and it concluded once RAB members indicated they had no further questions and were satisfied with the information presented. While the meeting did not result in formal policy recommendations, members expressed general concerns regarding the continued need for affordable housing in Glendale in light of rising rents and overall affordability challenges. As no specific recommendations were proposed, no formal written recommendations were produced for inclusion in the Annual Plan.

RAB meetings are not public hearings, and supporting materials such as agendas, sign-in sheets, and orientation materials are not required to be publicly posted.

The HUD-50075 certification does not predate the RAB meeting. Certification occurs in conjunction with approval of the Annual Plan at the public hearing before the City Council and Housing Authority Board, scheduled for May 5, 2026.

6. **Challenge:** The civil rights certification under 24 CFR 903.7(o), including its component certification of affirmatively furthering fair housing on the basis that the Plan's affirmative recommendation against absorbing EHV households into the regular Housing Choice Voucher (HCV) program and against placing EHV households on the regular waiting list is unaccompanied by any disparate impact, Section 504, VAWA, or Title VI analysis, despite the policy's foreseeable effect on protected classes who are systematically represented within the population of EHV-eligible households as defined by federal program rules.

Response: The Housing Authority is not in a position to absorb EHV participants into the regular Housing Choice Voucher (HCV) program due to an existing HUD-identified funding shortfall.

The City Council and the Housing Authority Board considered the option of placing EHV participants on the regular Section 8 HCV waiting list but elected to defer that action pending greater certainty regarding the availability of additional federal or state funding for the EHV program.

Furthermore, the City has developed a transition strategy utilizing non-HCV funding sources to mitigate the impact of the loss of EHV assistance to the extent feasible. These efforts reflect a good-faith approach to supporting affected households within available local resources.

7. **Challenge:** The Statement of Housing Needs under 24 CFR 903.7(a) and the Operation and Management element under 24 CFR 903.7(e), on the basis that the "EHV Program Outlook in Glendale" section of the HUD-50075-HCV form (p. 3) elevates the interests of one applicant population over another based solely on length of waiting time, without examining the demographic composition, protected-class status, or current housing instability of either group;

Response: The Housing Authority does not elevate one population over another, but rather, does its best to allocate resources and make difficult policy decisions within a constrained funding environment that balances the needs of many different populations. Length of time on the waiting list is one relevant consideration, as it reflects the stake of applicants who have waited many years for assistance, as well as those who have not yet had the opportunity to apply due to the waiting list remaining closed. These considerations were evaluated alongside program capacity and funding constraints.

The anticipated sunset of the Emergency Housing Voucher program is the result of the elimination of federal funding and is not a discretionary local action. The Housing Authority is operating within a HUD-identified funding shortfall and is not in a position to absorb EHV participants into the HCV program. The City Council and the Housing Authority Board considered the option of placing EHV participants on the regular HCV waiting list but elected to defer that action pending greater certainty regarding the availability of additional federal or state funding for the EHV program.

In response to the anticipated loss of EHV assistance, the City has developed a transition strategy utilizing non-HCV funding sources to mitigate impacts to affected households to the extent feasible.

8. **Challenge:** The Statement of Strategy for Addressing Housing Needs under 24 CFR 903.7(a)(1), on the basis that the Plan does not consider, evaluate, or reference the streamlined waiver and EHV-only waiting list preference pathways authorized by HUD Notice PIH 2025-19 ("Guidance on Transitioning EHV Families into HCV and End of EHV Services Fee Expenditure," issued June 20, 2025), the federal regulatory tools HUD has expressly authorized for transitioning EHV households into HCV, including the streamlined waiver, the closed-waiting-list reopening for EHV-preference families, and the ranked or multiple preference structures described in the Notice.

Response: The Housing Authority is aware of the tools identified in HUD Notice PIH 2025-19, including streamlined waiver options and waiting list preference pathways intended to facilitate the transition of EHV participants into the Housing Choice Voucher program. These tools are designed to provide administrative flexibility where program capacity and funding allow. However, the Housing Authority is currently operating within a HUD-identified funding shortfall and is not in a position to absorb EHV participants into the HCV program, regardless of available administrative waivers. As such, the options described in PIH 2025-19 do not overcome the underlying financial constraints affecting program capacity. The City Council and Housing Authority Board have also considered the option of placing EHV participants on the waiting list but elected to defer that action, as discussed in the response to the Civil Rights Certification challenge.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Form identification: *CA114-Housing Authority of the City of Glendale Form HUD-50075-HCV (Form ID - 7323)*
printed by Arthur Bolbolian in HUD Secure Systems/Public Housing Portal at 02/05/2026 01:28PM EST

Formal public challenge to elements of the draft FY 2026–2027 PHA Annual Plan

Pursuant to 24 CFR 903.17 and 903.23(b)

Submitted by: Ani Khash

Date: May 1, 2026

To: Edgar Akopyan, Housing Division, Glendale Housing Authority
(EAkopyan@GlendaleCA.gov)

CC: City Clerk (CityClerk@GlendaleCA.gov); City Council (CityCouncil@GlendaleCA.gov)

Re: Proposed redeployment of HOME funds from rental development to TBRA without a substantial amendment; inconsistency with the 2025–2030 Consolidated Plan

Pursuant to 24 CFR 903.17 and 903.23(b), this submission constitutes a formal challenge to the following elements of the draft FY 2026–2027 PHA Annual Plan:

- (1)** The financial resources element under 903.7(d), on the basis that the plan's associated bridge funding strategy relies on HOME funds that the City's own planning documents state cannot be deployed without a Consolidated Plan amendment and HUD concurrence that have not been initiated;
- (2)** The consistency with the Consolidated Plan under 903.23(a)(3), on the basis that the 2025–2030 Consolidated Plan states the City "does not plan to utilize HOME funds for Tenant Based Rental Assistance (TBRA)" and no Consolidated Plan amendment has been adopted;
- (3)** The AFFH certification under 903.7(o), on the basis that the plan contains no transition mechanism for 188 EHV households disproportionately composed of disabled individuals, domestic violence survivors, and racial/ethnic minorities.

I request that this challenge, and the PHA's written response, be attached to the plan upon submission to HUD as required by the HUD-50075 form, Section C.4.

The Housing Authority's public notice for this plan cycle does not inform the public that plan elements may be formally challenged under 24 CFR 903.23(b), or that challenged elements must be attached to the plan upon submission to HUD. I am exercising this right regardless.

Statement of facts

The City's own planning documents confirm a Consolidated Plan amendment is required.

The City's FY 2026–2027 Proposed Annual Action Plan (p. 10) lists "HOME Tenant-Based Rental Assistance – EHV Bridge Program: TBD" and states: **"Implementation of this activity is contingent upon amendment of the City's 2025–2030 Consolidated Plan and concurrence from HUD's Los Angeles Field Office."**

The same document (p. 11) further states: "The City will continue to evaluate opportunities to deploy these funds in accordance with HOME program requirements and expenditure deadline,

including potential use for a Tenant-Based Rental Assistance program, **contingent upon Consolidated Plan amendment.**"

The 2025–2030 Consolidated Plan states: **"Given the limited funding, the City does not plan to utilize HOME funds for Tenant Based Rental Assistance (TBRA)."**

Council voted to "approve the deployment" of funds that the City's own documents say require a process that has not been initiated.

The April 28, 2026 staff report (Report No. 26-89993, p. 12) identifies \$3,700,000 in "HOME Funds – Tenant Based Rental Assistance (TBRA)" for the EHV bridge. Council voted to "approve the deployment" of these funds. The 66-page staff report does not mention that the City's own Annual Action Plan describes this activity as contingent upon a Consolidated Plan amendment. It does not mention 24 CFR 91.505, the City's Citizen Participation Plan, or the 30-day public comment period required for substantial amendments.

The regulatory framework independently requires a substantial amendment.

24 CFR 91.505(a) requires a jurisdiction to amend its approved plan whenever it decides to: (1) change allocation priorities; (2) carry out an activity not previously described; or (3) change the purpose, scope, location, or beneficiaries of an activity. The City's Citizen Participation Plan (p. 12) requires amendment whenever a decision is made to: (1) carry out an activity not previously described; or (4) substantially change the purpose, scope, location, or beneficiaries. The proposed HOME TBRA activity satisfies multiple triggers under both.

The CPP requires a 30-day public comment period for substantial amendments (p. 12, item i). 24 CFR 91.105(c)(2) independently requires not less than 30 calendar days. No substantial amendment process has been initiated.

Questions

- 1. What portion of the \$3,700,000 identified as "HOME Funds" is HOME-ARP carryover from the \$5,109,346 approved March 21, 2023, and what portion is drawn from other HOME development fund balances?**
- 2. What portion has been committed or disbursed in IDIS for any previously approved HOME or HOME-ARP activity, and what portion remains uncommitted?**
- 3. Has staff determined whether the proposed HOME TBRA/EHV bridge activity requires a Consolidated Plan amendment, as the City's own FY 2026–2027 Proposed Annual Action Plan states? If so, what was the determination and basis? If staff's position differs from the Annual Action Plan's statement that implementation is "contingent upon amendment," please explain the discrepancy.**
- 4. Has the City initiated the Consolidated Plan amendment process referenced in its own Annual Action Plan? If so, when was the 30-day public comment period published? If not, when does staff anticipate initiating it?**
- 5. If staff's position is that no Consolidated Plan amendment or substantial amendment is required, please cite the specific provision of the CPP, federal regulation, or HUD guidance that exempts this activity, and explain how that position is reconciled with: (a) the City's own Annual Action Plan language stating implementation is contingent upon such an**

amendment; and (b) the 2025–2030 Consolidated Plan's statement that the City does not plan to utilize HOME funds for TBRA.

6. Can staff confirm that no HOME funds will be obligated or expended for TBRA until (a) any required Consolidated Plan amendment and substantial amendment process is completed; (b) HUD Los Angeles Field Office concurrence is received, as the Annual Action Plan requires; and (c) a subsequent appropriation action is taken by Council?

Basis for HUD review

Under 24 CFR 903.23(a), HUD may disapprove a plan that: (iii) is not consistent with any applicable Consolidated Plan for the jurisdiction. The 2025–2030 Consolidated Plan states the City does not plan to utilize HOME funds for TBRA. The FY 2026–2027 Annual Action Plan states the HOME TBRA activity is contingent upon a Consolidated Plan amendment that has not been adopted. The plan is being submitted to HUD in the context of a bridge funding strategy that the City's own documents say cannot be implemented without a process that has not begun.

I request that this challenge and the PHA's written response be reflected in the public hearing record and attached to the plan upon submission to HUD. I reserve all rights under 24 CFR 903.23(b), 24 CFR 91.105, 24 CFR 91.505, and the Ralph M. Brown Act.

Ani Khash

Glendale, California

Formal public challenge to elements of the draft FY 2026–2027 PHA Annual Plan

Pursuant to 24 CFR 903.17 and 903.23(b)

Consolidated filing incorporating all prior public comments

Submitted by: Ani Khash

Date: May 1, 2026

To: Edgar Akopyan, Housing Division, Glendale Housing Authority
(EAkopyan@GlendaleCA.gov)

CC: City Clerk (CityClerk@GlendaleCA.gov); City Council (CityCouncil@GlendaleCA.gov)

Re: Consolidated formal challenge: HOME TBRA substantial amendment, Consolidated Plan inconsistency, RAB procedural compliance, AFFH certification, housing needs, financial resources, and related matters

I. Formal challenge and scope

Pursuant to 24 CFR 903.17 and 903.23(b), this submission constitutes a formal challenge to the following elements of the draft FY 2026–2027 PHA Annual Plan. Under 903.23(b), HUD's review of the Annual Plan extends to "any other element of the PHA's Annual Plan that is challenged." I request that this challenge, the PHA's written response to each challenged element, and all prior public comments incorporated by reference, be attached to the plan upon submission to HUD as required by the HUD-50075 form, Section C.4.

The Housing Authority's public notice for this plan cycle does not inform the public that plan elements may be formally challenged under 24 CFR 903.23(b), or that challenged elements must be attached to the plan upon submission to HUD. I am exercising this right regardless.

Challenged elements:

(1) Financial resources — 903.7(d): The plan's associated bridge funding strategy relies on \$3,700,000 in HOME funds that the City's own planning documents state cannot be deployed without a Consolidated Plan amendment and HUD concurrence that have not been initiated, and on \$434,000 in Measure A funds that may already be committed to an existing contract.

(2) Consistency with the Consolidated Plan — 903.23(a)(3): The 2025–2030 Consolidated Plan states the City "does not plan to utilize HOME funds for Tenant Based Rental Assistance (TBRA)." No Consolidated Plan amendment has been adopted. The plan is inconsistent with the applicable Consolidated Plan.

(3) AFFH certification — 903.7(o): The plan contains no transition mechanism for 188 EHV households disproportionately composed of disabled individuals, domestic violence survivors,

elderly households, and racial/ethnic minorities. Six peer agencies (Long Beach, Pasadena, Burbank, Anaheim, Berkeley, Santa Monica) adopted the PIH 2025-19 EHV transition preference. Glendale deferred. The disparate impact of this deferral on protected classes has not been analyzed or addressed in the plan.

(4) Housing needs – 903.7(a): The plan does not adequately address the housing needs of 188 EHV households facing imminent loss of assistance, including extremely low-income families, elderly households, disabled individuals, and domestic violence survivors, as required by 903.7(a)(1)(i)–(iii).

(5) RAB consultation – 903.13: The February 25, 2026 RAB meeting lasted 38 minutes, included an orientation for new members, did not produce written recommendations, did not include documented EHV household representation, and the HUD-50075 certification may predate the RAB meeting. The RAB meeting materials were not posted on Engage Glendale or any other publicly accessible location during the comment period.

Incorporated prior public comments:

This challenge incorporates by reference all public comments I submitted during the noticed comment period, including submissions dated April 29, April 30, May 1, and May 3, 2026, addressing: (a) the resolution correction and 133-day error; (b) the 73 unanswered written questions; (c) the potential double-counting of \$434,000 in Measure A funds; (d) Single Audit findings on the HOME program; (e) the 14-day comment period on the March 2023 HOME-ARP Substantial Amendment; (f) RAB procedural compliance; and (g) public access to the March 2023 HOME-ARP allocation documents. Each of those submissions, together with the PHA's written response to each, must be attached to the plan upon submission to HUD.

II. The \$3.7 million HOME TBRA bridge cannot be deployed without a Consolidated Plan amendment

The City's own documents confirm this.

The City's FY 2026–2027 Proposed Annual Action Plan (p. 10) lists "HOME Tenant-Based Rental Assistance – EHV Bridge Program: TBD" and states: **"Implementation of this activity is contingent upon amendment of the City's 2025–2030 Consolidated Plan and concurrence from HUD's Los Angeles Field Office."**

The same document (p. 11) further states: "The City will continue to evaluate opportunities to deploy these funds in accordance with HOME program requirements and expenditure deadline, including potential use for a Tenant-Based Rental Assistance program, **contingent upon Consolidated Plan amendment.**"

The 2025–2030 Consolidated Plan states: **"Given the limited funding, the City does not plan to utilize HOME funds for Tenant Based Rental Assistance (TBRA)."**

The April 28, 2026 staff report (Report No. 26-89993, p. 12) identifies \$3,700,000 in "HOME Funds – Tenant Based Rental Assistance (TBRA)" for the EHV bridge. Council voted to "approve the deployment" of these funds. The 66-page staff report does not mention that the City's own Annual Action Plan describes this activity as contingent upon a Consolidated Plan amendment. It does not mention 24 CFR 91.505, the City's Citizen Participation Plan, or the 30-day public comment period required for substantial amendments.

The federal regulation independently requires a substantial amendment.

24 CFR 91.505(a) requires amendment when a jurisdiction decides to: (1) change allocation priorities; (2) carry out an activity not previously described; or (3) change the purpose, scope, location, or beneficiaries of an activity. The City's Citizen Participation Plan (p. 12) requires amendment when: (1) carrying out an activity not previously described; or (4) substantially changing the purpose, scope, location, or beneficiaries. The proposed HOME TBRA activity satisfies multiple triggers under both. The CPP requires a 30-day public comment period (p. 12, item i). 24 CFR 91.105(c)(2) independently requires not less than 30 calendar days. No substantial amendment process has been initiated.

Questions – HOME TBRA substantial amendment

1. What portion of the \$3,700,000 is HOME-ARP carryover from the \$5,109,346 approved March 21, 2023, and what portion is drawn from other HOME development fund balances?
2. What portion has been committed or disbursed in IDIS for any previously approved HOME or HOME-ARP activity, and what portion remains uncommitted?
3. Has staff determined whether the proposed HOME TBRA/EHV bridge activity requires a Consolidated Plan amendment, as the City's own FY 2026–2027 Proposed Annual Action Plan states? If staff's position differs from the Annual Action Plan's statement that implementation is "contingent upon amendment," please explain the discrepancy.
4. Has the City initiated the Consolidated Plan amendment process? If so, when was the 30-day public comment period published? If not, when does staff anticipate initiating it?
5. If staff's position is that no amendment is required, cite the specific provision of the CPP, federal regulation, or HUD guidance that exempts this activity, and explain how that position is reconciled with: (a) the Annual Action Plan language stating implementation is contingent upon amendment; and (b) the Consolidated Plan's statement that the City does not plan to utilize HOME funds for TBRA.
6. Can staff confirm that no HOME funds will be obligated for TBRA until (a) any required Consolidated Plan amendment is completed; (b) HUD Los Angeles Field Office concurrence is received; and (c) a subsequent appropriation action is taken by Council?

III. The staff report did not address the substantial amendment requirement

The 66-page staff report does not contain the following anywhere: "substantial amendment"; "24 CFR 91.505"; "citizen participation plan"; "30-day comment period"; "HOME-ARP Allocation Plan"; any reference to the March 21, 2023 Substantial Amendment; or any acknowledgment that TBRA and rental development are different eligible activity categories under CPD Notice 21-10. The report was prepared by the Housing Division (Community Development Department). The City's 2025–2030 Consolidated Plan identifies the Community Development Department as the HOME Administrator and the Community Services & Parks Department as the CDBG Administrator.

Questions – staff report omissions

7. Which department or official reviewed the proposed HOME TBRA use for compliance with 24 CFR 91.505 and the City's Citizen Participation Plan?
 8. Was the City Attorney's Office consulted on whether the April 28 motion can be implemented without completing the substantial amendment process?
-

IV. The March 2023 HOME-ARP Substantial Amendment had a deficient comment period

The published legal notice (Beacon Media News, March 6, 2023) provided a 14-day comment period (March 6–20, 2023) for a \$5,109,346 HOME-ARP allocation. The Citizen Participation Plan (p. 12, item i) requires 30 days. 24 CFR 91.105(k) requires the jurisdiction to follow its citizen participation plan. The October 2025 HOME-ARP Substantial Amendment used 30 days, demonstrating the City's awareness of the requirement. If the original HOME-ARP allocation was adopted with a deficient comment period, the procedural foundation for the \$3.7M bridge is in question.

Questions – March 2023 comment period

9. How many calendar days of public comment were provided for the March 2023 HOME-ARP Substantial Amendment?
 10. What authorized fewer than 30 days? If CPD Notice 21-10 (section V.B, 15-day minimum), explain why the CPP was not amended and why October 2025 used 30 days.
 11. Were any public comments received and summarized as required by 24 CFR 91.105(c)(3)?
-

V. The \$434,000 in Measure A funds may be double-counted

The December 16, 2025 resolution appropriated \$434,979 in County Measure A Local Solutions funds. The April 28 staff report identifies "\$434,000 in Homeless Services" as part of the \$4.1 million bridge. The FY 2026–2027 proposed budget shows the same \$434,979 under Measure A Homeless Services (Fund 2291) with \$87,000 in salaries and \$347,979 in direct assistance already

revised for FY 2026. The budget narrative states the funds "supported a pilot project in partnership with a local mental health center" in FY 2025-26. It is unclear whether the \$434,000 in the bridge is the same money already committed to Gateways Hospital in December.

Questions – double-counting

12. Is the \$434,000 in the April 28 staff report the same \$434,979 from the December 16, 2025 resolution?
 13. Is any portion committed to the Gateways Hospital contract or GRASP program?
 14. Does the Gateways contract draw from RPHP or Local Solutions?
 15. What is the current unobligated balance of (a) the RPHP allocation and (b) the Local Solutions allocation?
-

VI. The adopted LACAHSa resolution was erroneous for 133 days with no documented correction procedure

The December 16, 2025 resolution of appropriation for LACAHSa Measure A funds transposed the salary and direct assistance figures, showing 65% to salaries instead of 10%. Staff acknowledged the error on April 28, 2026 – 133 days later. The Glendale City Charter, Article VI, Section 8 requires ordinances to be amended by reenactment at length. The Charter does not specify a procedure for correcting adopted resolutions. The LACAHSa funds are part of the same \$4.1 million bridge package that includes \$3.7M in federal HOME funds. The City's handling of this resolution is relevant to its demonstrated capacity to administer the federal HOME component.

Questions – resolution correction

16. What is the resolution number? Was the correction ratified by Council action or processed administratively? Under what authority?
 17. Was the corrected resolution resubmitted to LACAHSa? Provide evidence of notification.
 18. Provide both the original (erroneous) and corrected versions for comparison.
-

VII. The RAB consultation does not satisfy 24 CFR 903.13

The February 25, 2026 RAB meeting lasted 38 minutes (11:05 AM to 11:43 AM). It included an orientation for new members, a presentation of "key components" of the Annual Plan, an "overview" of the Administrative Plan, and open discussion. The minutes record "Members expressed the need for continued focus on affordable housing in Glendale" but no specific written recommendations. The prior RAB meeting was February 20, 2025 – over twelve months earlier. The sign-in sheet lists 15 members but does not indicate voucher program status.

It is unclear whether any EHV households were represented. The RAB materials were not posted on Engage Glendale or any publicly accessible location during the comment period.

Under 24 CFR 903.13(a)(2), the PHA must provide "reasonable means" for the RAB to become informed. Under 903.13(c)(1), the plan submission must include RAB recommendations and, if not accepted, the PHA's reasons. Under 903.13(b)(3), when tenant-based families constitute more than 20% of assisted households, they must be represented. Glendale's assisted population is approximately 100% tenant-based.

Questions – RAB

19. On what date were the full draft plans provided to RAB members? How many days before the meeting?

20. Does the Housing Authority have written RAB recommendations to include in the HUD submission? If "continued focus on affordable housing" is the recommendation, what is the PHA's written response?

21. Which RAB members represent EHV households? Were EHV participants recruited for or represented on the RAB?

22. Was the HUD-50075-HCV form certified before or after the February 25 RAB meeting?

VIII. The HOME program has back-to-back audit findings while the City proposes to deploy \$3.7M through it

The City's HOME program (Assistance Listing 14.239) has been the subject of findings in the City's Single Audit reports in recent fiscal years. The proposed FY 2026–2027 budget reduces the Internal Audit Division. The City proposes to administer \$3,700,000 in HOME TBRA through a program with documented compliance deficiencies and diminishing internal oversight capacity.

Questions – audit findings and capacity

23. For FY 2019–2020 through the most recent audit, identify HOME findings: finding number, classification, description, and corrective action status.

24. Are there open or unresolved HOME findings?

25. Has HUD CPD LA conducted any monitoring review of Glendale's HOME or HOME-ARP program in the last three fiscal years?

26. What is the current staffing of the Internal Audit Division? Does the proposed budget maintain, reduce, or eliminate positions?

27. What internal controls and compliance framework does staff propose for HOME TBRA?

IX. Seventy-three written questions remain substantially unanswered

Between February 18 and April 27, 2026, I submitted 73 written questions. The Citizen Participation Plan (p. 16) requires written response within 10 working days. As of this filing, the substantial majority have not received any written response. A chronological index was submitted with my April 30 public comment and is incorporated by reference.

Questions — unanswered questions

28. How many of the 73 questions received a written response within the CPP's 10-working-day requirement?

29. By what date does the City expect to provide complete written responses?

X. The March 2023 HOME-ARP Substantial Amendment is not publicly accessible

The March 21, 2023 Substantial Amendment allocating \$5,109,346 in HOME-ARP funds is not posted on the City's CDBG document index. The Citizen Participation Plan (p. 14) requires "reasonable and timely access to information and records relating to the Consolidated Plan documents." The published legal notice confirms the amendment was processed. The public cannot evaluate the proposed \$3.7M TBRA redeployment without access to the foundational allocation documents.

Questions — records access

30. Is the March 2023 HOME-ARP Substantial Amendment available for public review? At what URL?

31. Was the HOME-ARP Allocation Plan accepted by HUD CPD LA in writing? On what date?

32. Can staff provide a current IDIS activity summary for all HOME-ARP activities?

XI. Basis for HUD review and potential disapproval

Under 24 CFR 903.23(a), HUD may disapprove a plan that:

(i) Does not provide all required information — the plan does not address the substantial amendment status of the \$3.7M HOME TBRA proposal or the RAB recommendations;

(ii) Is not consistent with information available to HUD — HUD's own EHV allocation records show 188 households that the plan does not adequately address;

(iii) Is not consistent with the applicable Consolidated Plan — the 2025–2030 Consolidated Plan states the City does not plan to utilize HOME funds for TBRA, and the Annual Action Plan

states the HOME TBRA activity is contingent upon a Consolidated Plan amendment that has not been adopted;

(iv) Is inconsistent with applicable federal law — the plan relies on a bridge funding strategy that cannot be implemented without completing the substantial amendment process under 24 CFR 91.505 and the City's own Citizen Participation Plan.

I request that this challenge and the PHA's written response to each challenged element be attached to the plan upon submission to HUD. I request that this challenge be presented to the Board of Commissioners before the adoption vote on May 5, 2026. I reserve all rights under 24 CFR 903.23(b), 24 CFR 903.13, 24 CFR 91.105, 24 CFR 91.505, and the Ralph M. Brown Act (Cal. Gov. Code § 54950 et seq.).

Ani Khash

Glendale, California

May 1, 2026

Formal public challenge to elements of the draft FY 2026–2027 PHA Annual Plan #3

Pursuant to 24 CFR 903.17 and 903.23(b)

Submitted by: Ani Khash

Date: May 3, 2026

To: Edgar Akopyan, Housing Division, Glendale Housing Authority
(Eakopyan@GlendaleCA.gov)

CC: City Clerk (CityClerk@GlendaleCA.gov); City Council (CityCouncil@GlendaleCA.gov)

Re: Civil rights certification under 24 CFR 903.7(o), including its component certification of affirmatively furthering fair housing and disparate impact analysis of the EHV Program Outlook in Glendale recommendations against absorbing or listing EHV households

Formal challenge and scope

Pursuant to 24 CFR 903.17 and 903.23(b), this submission constitutes a formal challenge to the following elements of the draft FY 2026–2027 PHA Annual Plan as currently posted at engage.glendaleca.gov for the noticed public review and comment period running February 20 through May 4, 2026 (the "Plan"):

- (1) The civil rights certification under 24 CFR 903.7(o), including its component certification of affirmatively furthering fair housing on the basis that the Plan's affirmative recommendation against absorbing EHV households into the regular Housing Choice Voucher (HCV) program and against placing EHV households on the regular waiting list is unaccompanied by any disparate impact, Section 504, VAWA, or Title VI analysis, despite the policy's foreseeable effect on protected classes who are systematically represented within the population of EHV-eligible households as defined by federal program rules;
- (2) The Statement of Housing Needs under 24 CFR 903.7(a) and the Operation and Management element under 24 CFR 903.7(e), on the basis that the "EHV Program Outlook in Glendale" section of the HUD-50075-HCV form (p. 3) elevates the interests of one applicant population over another based solely on length of waiting time, without examining the demographic composition, protected-class status, or current housing instability of either group;
- (3) The Statement of Strategy for Addressing Housing Needs under 24 CFR 903.7(a)(1), on the basis that the Plan does not consider, evaluate, or reference the streamlined waiver and EHV-only waiting list preference pathways authorized by HUD Notice PIH 2025-19 ("Guidance on Transitioning EHV Families into HCV and End of EHV Services Fee Expenditure," issued June 20, 2025), the federal regulatory tools HUD has expressly authorized for transitioning EHV households into HCV, including the streamlined waiver, the closed-waiting-list reopening for EHV-preference families, and the ranked or multiple preference structures described in the Notice.

I request that this challenge, and the PHA's written response to each challenged element, be attached to the Plan upon submission to HUD as required by HUD-50075 Section C.4.

The Housing Authority's public notice for this plan cycle does not inform the public that plan elements may be formally challenged under 24 CFR 903.23(b), or that challenged elements must be attached to the Plan upon submission to HUD. I am exercising this right regardless.

Statement of facts

The Plan currently posted on the City's noticed engage.glendaleca.gov public comment portal contains the following language in the "EHV Program Outlook in Glendale" section, on p. 3 of the form:

"Even if the Section 8 program were to return to stable funding, absorbing EHV participants into the regular program would not be recommended. Doing so would substantially reduce the availability of assistance for applicants who have remained on the waiting list since 2001, including elderly households awaiting the opportunity to receive housing support."

"While the GHA has the option to place EHV households onto the regular waiting list, this approach is not recommended because it would adversely affect existing applicants by altering the order and timing of assistance for families who have been waiting since 2001."

These two paragraphs do two distinct things. They affirmatively recommend against absorbing EHV households even under hypothetically stable Section 8 funding. They affirmatively recommend against placing EHV households onto the regular waiting list, in a context in which the Plan acknowledges this is an authorized "option." The Plan supplies one and only one rationale for both recommendations: protecting 2001 waiting list applicants from "altered order and timing of assistance."

The Plan does not contain any of the following:

- **Demographic data on the 188 EHV households served by GHA.**
 - **Demographic data on the approximately 1,000 applicants on the regular HCV waiting list whose interests the Plan elevates.**
 - **Any disparate impact analysis under 24 CFR 100.500.**
 - **Any Section 504 / 24 CFR Part 8 analysis. Any VAWA / 24 CFR Part 5 Subpart L analysis.**
 - **Any Title VI / 24 CFR Part 1 analysis.**
 - **Any reference to or analysis of HUD Notice PIH 2025-19. Any documentation of consultation with disability rights, domestic violence survivor, or fair housing organizations regarding the recommendations.**
-

The EHV population is, by federal program design, drawn from a population the City of Glendale's own data documents as composed in substantial part of protected-class members

The Emergency Housing Voucher (EHV) program was established by Section 3202 of the American Rescue Plan Act of 2021 (P.L. 117-2). HUD's Notice PIH 2025-19 (the "Notice"), at p. 1, Section 2, confirms that EHV's are "tenant-based rental assistance under Section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o))," and that "Eligibility for EHV's is limited to individuals and families who are (1) homeless; (2) at risk of homelessness; (3) fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or (4) recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability."

Each of these four federal eligibility categories intersects multiple protected-class statuses under federal civil rights law:

- **Disability under Section 504 of the Rehabilitation Act and 24 CFR Part 8.**
- **Survivor status under the Violence Against Women Reauthorization Act of 2013 and 24 CFR Part 5 Subpart L.**
- **Sex under the Fair Housing Act and HUD's implementing regulations.**
- **Race, color, and national origin under Title VI of the Civil Rights Act of 1964 and 24 CFR Part 1.**

The City of Glendale's own data documents the protected-class composition of the population from which its EHV recipients are drawn. The City's "2025 Glendale Homeless Count," conducted by the City's Community Development Department, Homeless Services Division, and published as the "City of Glendale 2025 Homeless Count Report," available at engage.glendaleca.gov, identified 197 individuals experiencing homelessness in the City of Glendale on the date of the count, a 13% increase compared to 2024.

Of those 197 individuals, the City's own published findings record:

- 26 individuals identified as chronically homeless, an increase from 18 in 2024. Under 24 CFR 91.5, chronic homelessness requires the documented presence of "a diagnosable substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability."
- 15 individuals experiencing serious mental illness.
- 24 individuals identified as survivors of domestic violence.
- 3 individuals living with HIV/AIDS.

The 2026 Glendale Homeless Count was conducted on January 20, 2026. The City's published timeline indicates the 2026 Homeless Count Report is anticipated for publication in May or June 2026. The City was therefore in possession of, or actively developing, current local data on the protected-class composition of its homeless and formerly homeless populations during the period in which the FY 2026–2027 PHA Annual Plan was drafted, finalized, made available for public comment, and presented for adoption.

The 188 EHV households served by GHA were drawn from populations meeting the federal EHV eligibility criteria described in Section 2 of PIH 2025-19. Federal eligibility

design makes it a reasonable inference that the 188 households include individuals with disabilities, survivors of gender-based violence, and members of racial and ethnic groups overrepresented among populations meeting these criteria, at rates substantially elevated above the rates in a general renter or applicant population. Glendale's own PIT data is consistent with that inference. Whether the 188 households in fact mirror that distribution is data the Plan does not produce. The Plan also produces no analysis comparing the protected-class composition of those 188 households to the protected-class composition of the approximately 1,000 applicants on the regular HCV waiting list whose interests the Plan's recommendations elevate. The absence of either dataset, in a Plan that recommends a course of action with foreseeable civil rights implications, is the basis on which this challenge is brought.

The Plan's recommendations are made in direct contradiction of HUD's own published guidance on this exact situation

HUD Notice PIH 2025-19, at p. 2, Section 3, states in its first paragraph: "HUD strongly encourages PHAs to transition EHV families to the HCV program so that EHV families do not lose assistance and potentially face homelessness."

The Notice's stated Purpose, at p. 1, Section 1, is that "PHAs may elect to transition EHV families into the HCV program so that EHV families do not experience a loss or gap in housing assistance and can remain in their assisted units."

The Notice provides specific procedural pathways for PHAs in GHA's circumstances. At p. 3, Section 3.a, the Notice states: "PHAs with a currently closed HCV waiting list who opt to transition EHV families may choose to open their waiting list only for families that qualify for an EHV preference. In this case, the PHA must include the preference in its administrative plan (24 CFR 982.54(d)(1))."

At p. 4, Section 3.b, the Notice describes the streamlined waiver: "As an alternative to only accepting individual applications from EHV families, HUD is providing a streamlined submission and review process for a regulatory waiver that, if approved, would permit PHAs to place all EHV families on its HCV waiting list with the appropriate preference."

The Notice also instructs PHAs, at p. 4, Section 3.b, that "In designing preferences, PHAs are reminded that all preferences must be consistent with fair housing and civil rights laws."

The Plan does not reference PIH 2025-19. The Plan does not reference the streamlined waiver. The Plan does not reference the EHV-only waiting list preference pathway available to PHAs with closed waiting lists. The Plan recommends against using the regulatory pathways HUD has expressly authorized for the situation the Plan describes, without acknowledging that those pathways exist or analyzing why they have been declined. The Notice authorizes multiple mechanisms, including targeted waiting-list reopening for EHV-preference families (p. 3, Section 3.a), ranked and multiple preferences to prioritize the most vulnerable households (p. 4, Section 3.b), the streamlined waiver to place all EHV families on the waiting list (p. 4, Section 3.b), and Mainstream-voucher use where eligible (p. 4, Section 3.b). The Plan addresses none of them.

The AFFH certification deficiency under 24 CFR 903.7(o)

Under 24 CFR 5.151, a PHA's AFFH certification is 'sufficient if the participant takes, in the relevant period, any action that is rationally related to promoting one or more attributes of fair housing as defined in section 5.150(a).' Section 5.150(a) defines fair housing as housing that is 'affordable, safe, decent, free of unlawful discrimination, and accessible as required under civil rights laws.'

Foreseeable termination of housing assistance for a population that, by federal eligibility design under PIH 2025-19, is systematically composed of protected-class members is not rationally related to promoting affordable, safe, accessible housing free of unlawful discrimination. The Plan does identify certain GHA actions related to EHV wind-down: notice to participants, coordination with the Continuum of Care, the Gateways Hospital partnership, and continued participation in NAHRO, CAHA, and PHADA. None of those actions, as described in the Plan, addresses the central recommendation against using HUD-authorized pathways that would prevent loss of housing for the affected households. Whether those actions, taken together with the recommendation against absorption and against waiting list placement, satisfy the rational-relation standard is the question this challenge places squarely before HUD.

The contradiction is sharpened by HUD's own instruction at p. 4 of PIH 2025-19, Section 3.b, that "all preferences must be consistent with fair housing and civil rights laws." HUD anticipated that the design of EHV transition preferences would itself raise fair housing and civil rights questions and instructed PHAs accordingly. The Plan's recommendation against creating any preference at all does not exempt GHA from the underlying civil rights analysis. It intensifies the question, because the recommended course of action results in the foreseeable termination of housing assistance for the affected population.

Disparate impact under 24 CFR 100.500

HUD's disparate impact regulation at 24 CFR 100.500 codifies the Fair Housing Act standard recognized in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, 576 U.S. 519 (2015). A facially neutral practice that produces a discriminatory effect on a protected class violates the Fair Housing Act unless the practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest and there is no less discriminatory alternative.

The Plan's recommendations operate against a population the federal eligibility rules at PIH 2025-19, p. 1, Section 2 establish as systematically composed of protected-class members. The Plan offers a "fairness" rationale rooted in length of time on the waiting list. The Plan does not analyze whether less discriminatory alternatives exist. The streamlined waiver pathway and EHV-only preference pathway authorized by PIH 2025-19, the Notice's allowance for a closed-waiting-list PHA to open the list only to EHV families, the Notice's allowance for time-limited preferences, the Notice's allowance for ranked preferences that prioritize the most vulnerable households (p. 4, Section 3.b), and the Notice's express guidance permitting PHAs to "consider adopting multiple EHV preferences to first prioritize the most vulnerable households"

(p. 4, Section 3.b) are all less discriminatory alternatives that HUD has explicitly authorized under the same federal rules. The Plan does not analyze any of them. The Plan does not explain why GHA cannot achieve any "fairness" interest by means less burdensome to a population that includes individuals with disabilities, survivors of gender-based violence, and persons in protected racial and ethnic classes.

Section 504 / 24 CFR Part 8

Under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and 24 CFR Part 8, GHA may not, on the basis of disability, deny a qualified individual with disabilities the opportunity to participate in or benefit from the federally assisted program, afford a benefit that is not equal to that afforded others, or provide a benefit that is not as effective in affording equal opportunity. A policy that recommends against extending continued HCV assistance to a population that, by federal eligibility design, includes individuals with disabilities at substantially elevated rates, while preserving the queue position of a comparison group whose disability composition has not been examined, raises a Part 8 question the Plan does not address.

The Plan's reliance on the Gateways Hospital and Mental Health Center partnership ("targeted case management for participants with behavioral health needs," HUD-50075-HCV form, p. 3, "GHA Response"; see also Item 14 of the Progress Report, form p. 5) raises a separate Part 8 question. Conditioning enhanced service on the presence of a specific category of disability or treatment need is itself a disability-based classification. The Plan does not describe how the partnership reaches the EHV households who do not have, do not disclose, or are not currently receiving treatment for behavioral health conditions, and does not explain how differential access to housing-stabilization services through this single specialized partnership is consistent with Part 8's prohibition on disability-based differential treatment.

VAWA / 24 CFR Part 5 Subpart L

The Violence Against Women Reauthorization Act of 2013, codified at 24 CFR Part 5 Subpart L, requires PHAs to take affirmative steps to ensure that survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking are not denied housing or housing assistance on the basis of survivor status. PIH 2025-19, p. 1, Section 2, identifies fleeing or attempting to flee these forms of violence as one of the four federal eligibility categories for EHV. Survivors of these forms of violence are therefore necessarily represented within the 188 EHV households at issue. The Plan's recommendation against extending continued HCV assistance to this population, without any Subpart L analysis, raises a compliance question the Plan does not address.

Questions

1. What is the demographic composition of the 188 EHV households currently served by GHA, including disability status, survivor status, race, ethnicity, sex, age, household composition, and primary language? Has GHA collected and analyzed this data?
2. What is the demographic composition of the approximately 1,000 applicants on the regular HCV waiting list whose interests the Plan's recommendations elevate? Has GHA collected and analyzed this data?
3. Has GHA conducted a disparate impact analysis under 24 CFR 100.500 of the recommendation against absorbing EHV households and against placing them on the regular waiting list? If so, please produce the analysis. If not, please explain the basis on which GHA's AFFH certification under 903.7(o) is being executed.
4. Identify the specific actions GHA has taken in the relevant period that are rationally related to promoting fair housing for the 188 EHV households, as required for a sufficient AFFH certification under 24 CFR 5.151.
5. Has GHA conducted a Section 504 / 24 CFR Part 8 analysis of the recommendation? If so, please produce it.
6. Has GHA conducted a VAWA / 24 CFR Part 5 Subpart L analysis of the recommendation? If so, please produce it.
7. Has GHA conducted a Title VI / 24 CFR Part 1 analysis of the recommendation? If so, please produce it.
8. Has GHA consulted with the Glendale Continuum of Care, disability rights organizations, domestic violence survivor organizations, fair housing organizations, or HUD Region IX regarding the recommendation against absorption and against waiting list placement? If so, please produce the consultation records.
9. Why does the Plan not explicitly reference HUD Notice PIH 2025-19, the streamlined waiver pathway described at p. 4 of that Notice, or the closed-waiting-list option described at p. 3 of that Notice, despite their direct relevance to GHA's circumstances?
10. What was the basis for GHA's decision not to apply for the streamlined waiver under PIH 2025-19? Please produce any internal analysis, board memoranda, or correspondence with HUD reflecting that decision.
11. Has GHA evaluated the time-limited or ranked preference structures described at p. 4 of PIH 2025-19, including the option of prioritizing "the most vulnerable households" through multiple preferences, as less discriminatory alternatives to the recommendation in the Plan? If so, please produce the evaluation. If not, please explain why these HUD-authorized alternatives have not been considered.
12. Does the Gateways Hospital and Mental Health Center partnership extend to all 188 EHV households, or only to those with documented behavioral health needs? If the latter, please describe how access to housing-stabilization assistance for households without behavioral health needs is being addressed under the Plan, and how the differential access is consistent with 24 CFR Part 8.
13. Did the Resident Advisory Board review the language quoted from p. 3 of the form in this challenge? If so, what specific recommendations did the RAB make regarding that language? Please produce the RAB meeting materials, agenda, attendance, and minutes documenting any such review.
14. The 2025 Glendale Homeless Count Report identifies 26 chronically homeless individuals (a category that under 24 CFR 91.5 requires a documented disabling condition), 24 survivors of domestic violence, 15 individuals with serious mental

illness, and 3 individuals living with HIV/AIDS within a single year's count of 197 individuals. Was this data consulted in the development of the recommendations on p. 3 of the form? If so, what was the analysis? If not, please explain why the City's own homeless services data was not used to inform a Plan addressing housing assistance for households drawn from that population.

Basis for HUD review

Under 24 CFR 903.23(a), HUD may disapprove a Plan that fails to meet PHA Plan elements, including civil rights certifications. Under 24 CFR 903.23(b), HUD's review of any element challenged by the public is expanded to encompass that challenged element.

This challenge places the civil rights certification under 903.7(o), the Statement of Housing Needs under 903.7(a), the Statement of Strategy under 903.7(a)(1), and the Operation and Management element under 903.7(e) within the scope of HUD's substantive review.

I request that this challenge and the PHA's written response to each challenged element be reflected in the public hearing record for May 5, 2026, and attached to the Plan upon submission to HUD as required by HUD-50075 Section C.4. I reserve all rights under 24 CFR 903.23(b), Section 504 of the Rehabilitation Act of 1973, the Fair Housing Act of 1968 as amended, Title VI of the Civil Rights Act of 1964, the Violence Against Women Reauthorization Act of 2013, the Ralph M. Brown Act (Cal. Gov. Code § 54950 et seq.), and the California Public Records Act.

Ani Khash

Glendale, California

May 3, 2026

Attached:

A. FY 2026-2027 PHA Annual Plan (Form HUD-50075-HCV, Form ID 7323) as posted at engage.glendaleca.gov for the noticed public review and comment period running February 20 through May 4, 2026, downloaded via Engage Glendale webpage engage.glendaleca.gov reading to https://hdp-us-prod-app-gndlca-engage-files.s3.us-west-2.amazonaws.com/4617/7369/2433/HUD-50075-HCV-Annual_Plan_2026-2027_3.0.pdf

B. HUD Notice PIH 2025-19, "Guidance on Transitioning EHV Families into HCV and End of EHV Services Fee Expenditure," issued June 20, 2025.

C. City of Glendale 2025 Homeless Count Report, City of Glendale Community Development Department, Homeless Services Division, available at engage.glendaleca.gov.

ATTACHMENTS: