

**1.0 PHA Information**  
PHA Name: HOUSING AUTHORITY OF THE CITY OF GREENVILLE, SC PHA Code: SC004  
PHA Type:  Small  High Performing  Standard  HCV (Section 8)  
PHA Fiscal Year Beginning: (MM/YYYY): 01/2016

**2.0 Inventory** (based on ACC units at time of FY beginning in 1.0 above)  
Number of PH units: 584 Number of HCV units: 2756  
VASH Vouchers = 123  
Project Based Voucher Allocations (available = 526)  
- Current Contract 128  
- Current Commitment 198 (Brookhaven – Westview)  
- Anticipated Commitment 140 (Scott Towers Site)  
- Anticipated Commitment 60 (Heritage at Sliding Rock)

**3.0 Submission Type**  
 5-Year and Annual Plan  Annual Plan Only  5-Year Plan Only

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

Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
				PH	HCV
PHA 1:					
PHA 2:					
PHA 3:					

**5.0 5-Year Plan.** Complete items 5.1 and 5.2 only at 5-Year Plan update.

**5.1 Mission.** State the PHA’s Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA’s jurisdiction for the next five years:  
  
*“To provide quality affordable housing that serves as a foundation to improve lives.”*

**5.2 Goals and Objectives.** Identify the PHA’s quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.  
  
See Attachment A

**PHA Plan Update**

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

**I. Public Housing Admissions of Continued Occupancy Plan**

a. No changes were made in FY 2015 to the ACOP

**II. Section 8 Housing Choice Voucher Program Administrative Plan**

**a. TGHA revised the Homeless Preference (see below)**

Chapter 3 Applying for Admissions / Subsection 3.4 Local Preference(s)

Local Preference(s)

TGHA will use local preferences as detailed below.

TGHA will accept applications from local preference applicants even when the waiting list may otherwise be closed. Applicants with local preferences will not be required to complete the on-line registration but will be placed directly on the waiting list in order of approval by TGHA. The following local preferences will be applied in order as listed.

- Public Housing Demolition/Disposition – Residents in “good standing” at a TGHA public housing community on the date the community was approved by HUD to be disposed or demolished.
- Public Housing Over/Under Housed Families – Residents in “good standing” at a TGHA public housing community or a TGHA sponsored mixed finance community who are over-housed or under-housed and no appropriate size housing unit exists to house the family.
- Homeless Referrals – Homeless families certified by United Housing Connections as homeless and actively participating in case management services referred to TGHA under the terms and conditions of a Memorandum of Understanding between TGHA and United Housing Connections to house 50 homeless families.
- Tenants in Projects Approved for PBV – Tenants that were in “good standing” at an existing or rehabilitation project approved by TGHA pursuant to a solicitation for Project Based Vouchers

**b. TGHA revised Chapter 16 Owner or Family Debts to allow for Repayment Agreements.**

Chapter 16 Owner or Family Debts / Subsection 16.2 Family Debt

Family Debts

Family debts may result from a single act or pattern of actions that:

“Constitutes false statement, omission, or concealment of a substantive fact that results in overpayment of housing assistance.”

Failure to report changes in family income within 30 days from the date of the change in income, shall result in a debt assessed to the family for the overpayment of Housing Assistance application to the increased income.

TGHA will only permit repayment agreements for the following circumstances:

1. If an over-housed Public Housing household is admitted to the Housing Choice Voucher Program because there are no appropriate size Public Housing units available, a repayment

6.0

agreement shall be permitted for any remaining Public Housing debts owed upon completion of the program transfer.

2. A Public Housing household that is transferred to the Housing Choice Voucher Program as the result of a demolition or disposition action taken by TGHA and approved by HUD, shall be permitted a repayment agreement for any remaining Public Housing debts owed upon completion of the transfer.
3. A Housing Choice Voucher participant that is required to move due to a mandatory transfer for Housing Quality Standards violations and the landlord refuses to make the required repairs shall be permitted a repayment agreement for any debt owed for the unit from which they are required to move.
4. If a household member of a Housing Choice Voucher participant becomes newly disabled and moves to another unit to meet the needs of the disabled individual, a repayment agreement will be permitted for any debt owed for the unit vacated.
5. The Executive Director may approve repayment agreements for other reasons beyond the control of the participant at his/her sole discretion.

Terms of Repayment Agreement:

- Repayment agreements require an initial payment of 20% of the total debt owed upon execution of the agreement.
- The remaining balance owed shall be equally divided into no more than six monthly installments.
- Payments shall be due by the 15th day of each month.
- Failure to make a payment shall result in issuance of a proposed termination of assistance pursuant to the provisions detailed further in this plan.

Families who owe money to TGHA due to unreported income will be issued a proposed termination of assistance pursuant to the provisions detailed further in this plan. The family may, at the sole discretion of the TGHA Hearing Officer, be permitted a limited time not to exceed the end of the second month following the date of the hearing, to make payment in full for any excess housing assistance payment due and payable to TGHA as the result of unreported income.

If a family owes an amount, which equals or exceeds \$2,500 as a result of program fraud, TGHA will refer the case for criminal prosecution to the HUD Inspector General. TGHA will take all action available under federal and state laws to collect any debt owed.

**c. TGHA Revised Chapter 21 – HCV Homeownership**

**III. Rental Assistance Demonstration:**

The Greenville Housing Authority (TGHA) has submitted an application to convert all Public Housing to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6C and 1.6D of PIH Notice 2012-32. These residents' rights, participation, waiting list and grievance procedures are appended to this attachment. Additionally, The Housing Authority of the City of Greenville is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing TGHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that TGHA may also borrow funds to address their capital needs. TGHA will also contribute Replacement

Housing Factor (RHF) funds and Public Housing Reserve funds in the amount of approximately \$3 million dollars.

**Significant Amendment Definition:**

As part of the Rental Assistance Demonstration (RAD), the Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

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

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan.

The Plan will be available at the following location: [www.tgha.net](http://www.tgha.net)

The Plan will be also be available at the administrative office building located at:  
 122 Edinburgh Court  
 Greenville, SC 29607

PHA Plan Elements (24 CFR 903.7)

The Housing Authority of the City of Greenville, SC Elements can be found in the attached ACOP and Housing Choice Voucher Program Administrative Plan. The updated FY 2016 Financial Resources element is below.

**1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.**

Both the attached Admissions and Continued Occupancy (ACOP) and the HCV Administrative Plan (Admin Plan) have been revised since the last submittal; the changes are summarized in Section 6.0 (A) and included in the attachments.

**2. Financial Resources**

The table below lists the Housing Authority of the City of Greenville anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the Authority, as well as tenant rents and other income available to support public housing and Section 8 in Fiscal Year beginning 1/01/2016. The 2012, 2013 and 2014 Capital Fund and the 2009 thru 2015 Replacement Housing factor amounts are the unobligated amounts as of 7/30/2015. The 2015 Capital Fund program grants are available for the 2016 fiscal year.

Funding Sources	Amount	Planned Use
<b>Federal Grants</b>		
Public Housing Operating Fund (85% eligibility)	\$1,597,272	Operations
Public Housing Capital Fund Program - 2015	\$837,629	Operations / Capital Improvements
Public Housing Replacement Housing Grant - 2015	\$56,717	Replacement Housing
Section 8 Housing Choice Voucher Programs Tenant Based Assistance HAP (99% eligibility)	\$14,555,445	Housing Assistance Payments
Section 8 Housing Choice Voucher Programs Tenant Based Assistance Admin Fee (79% eligibility)	\$1,392,668	Administration
ROSS Grants - <a href="#">SC004FSH606A014</a>	\$100,547	HCV / Public Housing FSS Coordinator
ROSS Grants - <a href="#">SC004RPS026A011</a>	\$240,000	HCV / Public Housing FSS Coordinator
ROSS Grants - <a href="#">SC004RPS059A014</a>	\$246,000	HCV / Public Housing FSS Coordinator
<b>Prior Year Federal Grants (unobligated funds only)</b>		
Capital Fund 2013 - <a href="#">SC16P004501-13</a>	\$373,185	Capital Improvements
Capital Fund 2014 - <a href="#">SC16P004501-14</a>	\$760,798	Capital Improvements
Capital Fund - Replacement Housing Funds (2010 - 2014)	\$1,375,214	Replacement Housing
<b>Other Sources:</b>		
Public Housing Dwelling Rental Income	\$862,548	Operations

Public Housing Other Tenant Charges & Misc Income	\$38,160	Operations
Total	\$22,436,183	

**3. Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.**

Public Housing Rents are outlined in detail in the ACOP (Section 6.1 – Calculation of Rent). But, in general rents are either income based or flat rent. There are also policies regarding minimum rents and hardship exemptions, pro-rated rents for mixed families.

Housing Choice Voucher participants’ computation of Total Tenant Payment and Determination of Rent is outlined in detail in Section 5 Income and Subsidy Determinations of the Administrative Plan.

**4. Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. This information can be found throughout the HCV Administrative Plan, ACOP and Public Housing Lease Addendum.

**5. Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. This information can be found in the Admin Plan (Section 17.1 – Complaints and Appeals) for section 8 and the following is the procedure for public housing.

**12.1. General**

The Greenville Housing Authority (TGHA) Grievance Policy is applicable to all individual grievances including grievances pertaining to individuals with disabilities. Grievances apply to any issue or concern between the public housing resident and TGHA. TGHA may elect to refuse to hear a grievance concerning an eviction based upon a tenant’s threat to the health or safety of other tenants or TGHA employees.

The Grievance Policy is not intended as a forum for initiating or negotiating policy changes between groups of tenants and TGHA’s Board of Commissioners: it is intended to resolve individual issues or concerns.

**12.2. State Law**

The Department of Housing and Urban Development (HUD) has determined that South Carolina State Landlord/Tenant Law provides the necessary pre-eviction hearing and other elements of due process. Therefore, criminal activity evictions are excluded from this grievance policy.

**12.3. Definition of Terms**

“Grievance” shall mean any dispute that a tenant may have with respect to TGHA action or failure to act in accordance with the individual tenant’s lease or TGHA policies, which adversely affect the individual tenant’s rights, duties, welfare, or status.

“Complainant” shall mean any tenant whose grievance is presented to TGHA in accordance with the requirements for filing a grievance.

“Elements of Due Process” shall mean any eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:

- Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction;
- Opportunity for the tenant to examine all relevant documents, records and regulations of TGHA prior to the trial for the purpose of preparing a defense;
- Right of the tenant to be represented by counsel;
- Opportunity for the tenant to refute the evidence presented by TGHA, including the right to cross-examine witnesses and to present any affirmative legal or equitable defense, which the tenant may have;
- A decision on the merits.

“Hearing Officer” shall mean a person selected in accordance with the regulations to hear grievances and render a decision with respect thereto.

"Tenant" shall mean any lessee, or the remaining head of the household, of any tenant family residing in housing accommodation covered by these regulations.

#### 12.4. Informal Settlement of Grievance

Any grievance shall be personally presented, either orally or in writing, to TGHA property office, so that the grievance may be discussed informally and settled without a hearing. A summary of such discussion shall be prepared within ten (10) working days and one copy shall be given to the tenant and one retained in TGHA tenant file.

The summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and shall specify the Policy by which a hearing may be obtained if the complainant is not satisfied.

#### 12.5. Procedure to Obtain a Hearing

**Request for Hearing** – The complainant shall submit a written request for a hearing to TGHA within ten (10) working days after receipt of the summary of discussion, as explained above. The written request shall specify: the reasons for the grievance; and, the action or relief sought.

**Selection of Hearing Officer** – Grievances shall be presented before a hearing officer. TGHA shall provide for the appointment of an impartial hearing officer who may be an employee or official of TGHA who is not directly involved in the day-to-day administration of the Public Housing program.

**Failure to Request a Hearing** – If the complainant does not request a hearing in accordance with this policy, then TGHA's disposition of the grievance shall become final. Failure to request a hearing shall not constitute a waiver by the complainant of his right thereafter to contest TGHA's action in disposing of the complaint in an appropriate judicial proceeding.

**Hearing Prerequisite** – All grievances shall be personally presented either orally or in writing pursuant to the informal procedure prescribed above as a condition precedent to a hearing under this section. If the complainant shows good cause why he/she failed to proceed in accordance with the above to the hearing officer, the hearing officer may waive the provisions of this subsection.

**Escrow Deposit** – Before a hearing is scheduled in any grievance involving the amount of rent which TGHA claims is due, the complainant shall pay to TGHA an amount equal to the rent due and payable as of the first of the month preceding the month in which the act or failure to act took place. The complainant shall thereafter deposit the same amount of the monthly rent in an escrow account monthly until the complaint is resolved by decision of the hearing officer.

These requirements may be waived by TGHA in extenuating circumstances. Unless so waived, the failure to make such payments shall result in a termination of the grievance procedure. Failure to make payment shall not constitute a waiver of any right the complainant may have to contest TGHA's disposition of his grievance in any appropriate judicial proceeding.

If the grievance concerns the denial of a financial hardship exemption from the minimum rent requirement or the effect of welfare benefit reductions in the calculation of family income, the requirement for the escrow deposit is waived.

**Scheduling of Hearings** – Upon complainant's compliance with the provisions of this section, a hearing shall be scheduled by the hearing officer within ten (10) working days after receipt of the complainant's request for a time and place reasonably convenient to both the complainant and TGHA. A written notification specifying the time, place and the Policy governing the hearing shall be delivered to the complainant and the hearing officer.

**Failure to Appear** – When an informal or formal hearing is scheduled and the participant has been notified of the date and time but does not attend the hearing or call to notify TGHA of a problem, the decision will default on behalf of TGHA. If the participant provides proof of an emergency that precluded attendance at the hearing, at the discretion of TGHA, the hearing may be rescheduled.

#### 12.6. Policy Governing the Hearing

The hearing shall be held before a hearing officer.

The complainant shall be afforded a fair hearing providing the basic safeguards of due process, which shall include:

- The opportunity to examine, before the hearing and at the expense of the complainant, to copy all documents, records and regulations of TGHA that are relevant to the hearing. Any document not so made available after request therefore by the complainant may not be relied on by TGHA at the hearing;
- TGHA will be given the opportunity to examine, at TGHA's offices before the hearing, any family documents that are directly relevant to the hearing. TGHA will be allowed to copy any such document at TGHA's expense. If the family does not make the document(s) available for examination on request of TGHA, the family may not rely on the document at the hearing. The term document includes records and regulations.
- The right to be represented by counsel or other person chosen as his or her representative;
- The right to a private hearing unless the complainant requests a public hearing;
- The right to present evidence and arguments in support of his or her complaint, to controvert evidence relied on by TGHA or project management, and to cross-examine all witnesses on whose testimony or information TGHA or project management relies;
- A decision based solely and exclusively upon the facts presented at the hearing.

The hearing officer may render a decision without proceeding with the hearing if the hearing officer determines that the issue has been previously decided in another proceeding.

If the complainant or TGHA fails to appear at a scheduled hearing, the hearing officer may make a determination to postpone the hearing for a period not to exceed five business days or may make a determination that the party has waived the right to a hearing. The hearing officer shall notify both the complainant and TGHA of the determination.

A determination that the complainant has waived the right to a hearing shall not constitute a waiver of any right the complainant may have to contest TGHA's disposition of the grievance in an appropriate judicial proceeding.

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter TGHA must sustain the burden of justifying TGHA action or failure to act against which the complaint is directed.

The hearing shall be conducted informally by the hearing officer and oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings. The hearing officer shall require TGHA, the complainant, counsel, and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.

The complainant or TGHA may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.

#### 12.7. Decision of the Hearing Officer

The hearing officer shall prepare a written decision together with the reasons therefore, within ten (10) working days after the hearing. A copy of the decision shall be sent to the complainant and TGHA. TGHA shall retain a copy of the decision in the tenant's file. A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by TGHA and made available for inspection by a prospective complainant, his representative, or the hearing officer.

The decision of the hearing officer or hearing panel shall be binding on TGHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless TGHA determines within a reasonable time, and promptly notifies the complainant of its determination, that:

- The grievance does not concern TGHA action or failure to act in accordance with or involving the complainant's lease on TGHA regulations, which adversely affect the complainant's rights, duties, welfare, or status;
- The decision of the hearing officer is contrary to applicable Federal, State or local law, HUD regulations or requirements of the Annual Contributions Contract between HUD and TGHA.

A decision by the hearing officer, in favor of TGHA or which denies the relief requested by the complainant in whole or in part, shall not constitute a waiver of nor affect in any manner what so ever any rights the complainant may have to a trial, or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

#### 12.8. Hearing Policy for Denial of Assistance on the Basis of Ineligible Immigration

A public housing family may request that TGHA provide for an informal hearing after the family has notification of the INS decision on appeal, or in lieu of request of appeal to the INS. The participant family must make this request within 30 calendar days of receipt of the Notice of Denial or Termination of Assistance, or within 30 calendar days of receipt of the INS appeal decision.

#### 12.9. Eviction Actions

If a tenant has requested a hearing in accordance with the regulations on a complaint involving a TGHA notice of termination of the tenancy and the hearing officer upholds TGHA's action to terminate the tenancy, TGHA shall not commence an eviction action in a State or local court until it has served a notice to vacate on the tenant, and in no event shall the notice to vacate be issued prior to the decision of the hearing officer or the hearing panel having been mailed or delivered to the complainant. Such notice to vacate must be in writing and specify that if the tenant fails to exit the premises within the applicable statutory period, or on the termination date stated in the Notice of Termination, whichever is later, appropriate action will be brought against him and he may be required to pay court costs and attorney fees.

#### 12.10. Reasonable Accommodation

TGHA shall provide reasonable accommodations for persons with disabilities to participate in the hearing. Reasonable accommodations may include qualified sign language interpreters, readers, accessible locations, or attendants. If the resident is visually impaired, any notice to the resident that is required by this Policy must be in an accessible format.

#### 12.11. Discrimination Complaints

Nothing contained in this grievance procedure shall preclude a complainant from exercising their rights if the complainant believes he/she is being discriminated against on the basis of race, color, religion, sex, familial status, national origin, or handicap.

- 6. Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.

In 2015, TGHA secured elderly designation for The Manor at West Greenville prior to the mixed finance closing in February.

TGHA will submit in FY 2016 a Designated Housing Plan to HUD for approval to designate Garden Apartments, Charleston Place, Ridgeway and Arcadia (Senior) as occupancy by only elderly families.

- 7. Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).

(1) & (2) The HHA has combined the operations of its self-sufficiency initiative funded by the Family Self-Sufficiency Grant that serves both public housing and voucher participants. Currently, there are 55 participants in the public housing FSS program. The grant offers Case Management and Asset Building services as core components to propel low-come individuals towards economic self-sufficiency. A FSS Coordinator is assigned to motivate families and assist them in addressing any barriers, along with providing linkage to supportive services to ensure the achievement of goals. Referrals are provided for professional attire, subsidized child-care, financial literacy, rent/utility assistance, job placement, job preparation, furniture assistance, financial aid, resume preparation, scholarship assistance, mental health counseling, low-cost health care, literacy classes, employment opportunities, job training classes, career counseling, legal aid, parenting classes, homeownership programs, life skills training and other supportive services. Participants also have access to ongoing support and resources to increase their ability to accomplish short-term/long-term goals, within a 5-year period. In addition to assisting residents in becoming self-sufficient, the Housing Authority's FSS Program also assists public housing residents to build assets such as opening



a saving account, improving credit scores and establishing household budgets to manage debt. FSS participants who become employed are informed and connected to the agency's employment incentive programs: (1) Earned Income Disregards (EID) and (2) Escrow Accounts. These programs delay rent increases resulting from increased earned income received by eligible residents' participation in the FSS Program and/or other workforce development activities. The FSS Coordinator also engages assistance and guidance from a Program Coordinating Council which is comprised of various public and private sector partners.

In addition to the FSS program, the HHA manages the following programs to promote economic self-sufficiency opportunities among public housing residents:

A. Resident Opportunities & Supportive Service Program (ROSS) was funded by the Department of Housing & Urban Development (HUD). The program enhances the HHA's efforts to improve the quality of life. The program assists non-elderly residents in becoming economically self-sufficient, while promoting independent living among elderly and disabled residents. Three Service Coordinators and a network of local partners offer resources to an average of 200 clients. While grant funds were expended, the TGHA submitted a renewal grant to continue supporting the program.

B. Section 3 Employment & Training Program provides opportunities that promote economic self-sufficiency, among low-income individuals, particularly tenants of TGHA's low-income housing programs. The program seeks to engage clients in opportunities relating to training, employment and entrepreneurship. The ultimate goals are to enable clients to: 1) acquire job skills leading to stable employment, 2) increase earned income and/or 3) establish/expand a business. The Section 3 program also host employment workshops and job/career fairs in which clients are sought to fulfill the HHA's available staffing opportunities.

(3) Chapter 4 of the ACOP (Chapter 10.3 Community Service) addresses the Community Service requirement and HHA's and resident's obligations under 24 CFR 960 Subpart F.

Chapter 6.3 of the ACOP describes the treatment of income for the Earned Income Disallowance (EID).

**8. Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

- (i) The TGHA collects data of incident and arrest reports that will inform the need for measures to ensure safety of public housing residents.
- (ii) TGHA, along with local law enforcement have, regular community/safety meetings where information is shared and safety tips and literature is handed out to the residents.
- (iii) TGHA remains in contact with municipal, county, state and federal law enforcement. These contacts are with regards to crimes, wanted persons and arrests made at all TGHA sites. TGHA also uses information from these agencies for crime prevention measures and activities. The City of Greenville Police Department also has assigned a law enforcement officer, who acts as the community service officer providing crime prevention education and information to residents.

#### **Domestic Violence**

The Greenville Housing Authority is committed to preserving the peaceful enjoyment of all communities. TGHA is cognizant of actions that may pose a threat related to domestic violence, dating violence or stalking. In compliance with the Violence Against Women Act and Justice Department Reauthorization Action of 2013 (VAWA) TGHA will not terminate the lease or evict victims of criminal activity related to their victimization. See below in #13.

**9. Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.

**Housing Authority of the City of Greenville, SC**

## Pet Policy

This policy does not apply to animals that are used to assist persons with disabilities. Service animals are allowed in all public housing facilities with no restrictions other than those imposed on all tenants to maintain their units and associated facilities in a decent, safe, and sanitary manner and to refrain from disturbing their neighbors. Medical documentation will be required for all service animals in units.

The Housing Authority of the City of Greenville, SC (HACGSC) will allow only domesticated dogs, cats, birds, and fish in aquariums in units.

Only one (1) dog or cat and up to two (2) birds and unlimited fish in aquariums per unit is allowed.

Any animal commonly considered to be potentially harmful to the health or safety of others, including attack or fight trained dogs, will not be allowed.

At no time should any animal exceed twenty-five (25) pounds in weight.

### **Inoculations**

In order to be registered, pets must be appropriately inoculated against rabies and other conditions prescribed by local ordinances. Residents must also provide a picture of the animal at the time of registration for the file. Residents will be required to present up-to-date shot records at each annual recertification.

### **Pet Deposit and Fees**

A pet deposit of \$150.00 and a non-refundable pet fee of \$150.00 are required at the time of registering a cat or dog. The payment of the entire \$300.00 is required; no payment arrangements will be made for either a pet fee or deposit. The deposit of \$150.00 is refundable when the pet or the family vacates the unit, less any amounts owed due to damage beyond normal wear and tear. No pet deposit or fee will be charged for fish or birds.

### **Financial Obligation of Residents**

Any resident who owns or keeps a pet in their dwelling unit will be required to pay for any damages caused by the pet. Also, any pet-related insect infestation in the pet owner's unit will be the financial responsibility of the pet owner and the HACGSC reserves the right to exterminate and charge the resident.

### **Nuisance or Threat to Health or Safety**

The pet and its living quarters must be maintained in a manner to prevent odors and other unsanitary conditions in the owner's unit and surrounding areas.

Repeated substantiated complaints by neighbors or TGHA personnel regarding pets disturbing the peace of neighbors through noise, odor, animal waste or other nuisance will result in the owner having to remove the pet or move from the unit.

### **Designation of Pet Areas**

Pets must be kept in the owner's apartment or on a leash at all times when outside (no outdoor cages or fencing may be constructed). Pet owners must clean up after their pets and are responsible for disposing of pet waste. Pets **shall not** be chained or tied up outside the unit. TGHA reserves the right to contact the appropriate community authority to remove the pet should one be found to be chained or tied up outside the unit.

### **Visiting Pets**

Pets that meet the size and type criteria outlined herein may visit the buildings where pets are allowed for up to two weeks with TGHA approval. Tenants who have visiting pets must abide by the conditions of this policy regarding health, sanitation, nuisances, and peaceful enjoyment of others. If visiting pets violate this policy or cause the tenant to violate the lease, the tenant will be required to remove the visiting pet.

### **Removal of Pets**

The HACGSC, or an appropriate community authority, shall require the removal of any pet from a unit if the pet's conduct or condition is determined to be a nuisance or threat to the health or safety of other occupants of the property or of other persons in the community where the unit is located.

- 10. Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations, is included in Section 11. Required Submission for HUD Field Office Review.

- 11. Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.

The 2014 Audit is included as an attachment.

- 12. Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

TGHA has fully converted to an asset based management model of property management. All of our properties are managed by TGHA staff.

- 13. Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

### **Violence Against Women Act (VAWA) Policy**

#### **PURPOSE AND APPLICABILITY**

The purpose of the Violence Against Women Act Policy ("Policy") is to implement the applicable provisions of the Violence Against Women Reauthorization Act of 2013 ("VAWA") and to provide the rights of applicants, participants, and tenants and responsibilities of the Greenville Housing Authority ("Housing Authority").

This Policy is applicable to the Housing Authority's public housing and Housing Choice Voucher Program. This policy is gender-neutral, and its protections are available to female and male victims of domestic violence, dating violence, sexual assault, and stalking.

A copy of this Policy shall be available at each public housing development and the Housing Authority's Main Administrative Office at 122 Edinburgh Court, Greenville, SC 29607.

#### **GOALS AND OBJECTIVES**

This Policy has the following principal goals and objectives:

1. maintaining compliance with all applicable legal requirements imposed by VAWA;
2. insuring the physical safety of victims of domestic violence, dating violence, sexual assault, or stalking who are assisted by the Housing Authority;
3. providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault, or stalking;
4. creating and maintaining collaborative arrangements between law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of domestic violence, dating violence, sexual assault, and stalking who receive housing assistance from the Housing Authority; and
5. taking appropriate actions in response to acts of domestic violence, dating violence, sexual assault, or stalking that affect persons who receive housing assistance from the Housing Authority.

#### **OTHER HOUSING AUTHORITY POLICIES AND PROCEDURES**

This Policy is referenced in and attached to the HHA's Five-Year Public Housing Agency Plan and is part of the Greenville Authority's Admissions and Continued Occupancy Policy for public housing and the Housing Choice Voucher Program Administrative Plan.

To the extent a provision of this policy varies or contradicts any previously adopted Housing Authority policy or procedure, the provisions of this Policy shall prevail.

#### DEFINITIONS

"Dating violence" means violence committed by a person

- a) who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- b) where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - i. the length of the relationship,
  - ii. the type of relationship, and
  - iii. the frequency of interaction between the persons involved in the relationship.

"Domestic violence" means felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

"Sexual assault" means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

"Stalking" means

- a) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person to place under surveillance with the intent to kill, injure, harass or intimidate another person; and
- b) in the course of, or as a result of, such following, pursuit, surveillance or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to
  - a. that person;
  - b. a member of the immediate family of that person; or
  - c. the spouse or intimate partner of that person.

#### PROTECTIONS FOR VICTIMS

The Housing Authority shall not deny admission, terminate assistance, or evict a tenant solely on the basis of the person's status as a victim of domestic violence, dating violence, sexual assault, or stalking. In addition, criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking shall not be cause for denial of admission, termination of assistance, or eviction.

#### ACTIONS NOT PROTECTED UNDER VAWA

The Housing Authority may terminate assistance for a participant and the Housing Authority/landlord may evict a tenant if the victim is an actual and imminent threat to other tenants or staff. Further, the Housing Authority may deny admission or terminate assistance and the Housing Authority/landlord may evict a tenant if the basis for the action is not related to domestic violence, dating violence, sexual assault, or stalking.

#### DOCUMENTATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

The Housing Authority and the landlord may ask the victim to prove or "certify" that he or she is a victim of domestic violence, dating violence, sexual assault, or stalking. A person can prove that he or she is a victim by submitting one of the following:

1. a HUD-approved certification form provided by the Housing Authority or the landlord;
2. a document that is signed by the applicant, participant, or tenant and an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional who assisted the victim relating to domestic violence, dating violence, sexual assault, or stalking. The professional must state, under penalty of perjury, that he or she believes that the abuse meets the requirements under VAWA;

3. a Federal, State, tribal, territorial, or local police or court record;
4. a record of an administration agency; or
5. a statement or other evidence provided by the applicant, participant, or tenant at the discretion of the Housing Authority or the landlord.

The victim of domestic violence, dating violence, sexual assault, or stalking is required to provide the name of the perpetrator on the HUD-approved certification form only if the name of the perpetrator is safe to provide and is known to the victim. The applicant, participant, or tenant must provide the documentation within 14 business days after the date that the Housing Authority or the landlord requests for documentation. Discretion to extend the 14-day deadline is at the Housing Authority and the landlord.

#### **CONFIDENTIALITY**

Any information submitted to the Housing Authority or the landlord regarding domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and may not be entered into any shared database or disclosed to any other organization or person unless:

1. the applicant, participant, or tenant requests or consents in writing;
2. the Housing Authority or the landlord needs to use the information in an eviction proceeding, such as to evict the victim's abuser; or
3. a law requires the Housing Authority or the landlord to release the information.

#### **EMERGENCY MOVES AND TRANSFERS**

If it is necessary for the victim to move to another dwelling to receive protection, the Housing Authority and the landlord shall execute an emergency move for the victim to another available and safe dwelling under a covered housing program. Reasonable confidentiality measures shall be implemented to ensure that the public housing agency or landlord do not disclose the location of the new dwelling unit of the victim to a person that commits an act of domestic violence, dating violence, sexual assault, or stalking.

#### **BIFURCATION OF LEASE**

The Housing Authority or the landlord may bifurcate a lease for housing in order to evict or remove a tenant who engages in criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking against another tenant. If such bifurcation occurs and the removed tenant was the sole tenant eligible to receive assistance under a housing program, the Housing Authority or the landlord shall provide any remaining tenant the opportunity to establish eligibility for the covered housing program. If the remaining tenant cannot establish eligibility, the Housing Authority or the landlord will provide the tenant a reasonable time to find new housing or establish eligibility under another covered housing program.

#### **RELATIONSHIPS WITH SERVICE PROVIDERS**

The Housing Authority shall cooperate with organizations and entities that provide shelter or services to victims of domestic violence, dating violence, sexual assault, or stalking. If the Housing Authority staff becomes aware that an assisted person is a victim of domestic violence, dating violence, sexual assault, or stalking, the Housing Authority will refer the victim to shelter or other service providers as appropriate. This Policy does not create any legal obligation requiring the Housing Authority to maintain a relationship with a particular shelter or service provider to victims or to make a referral in any particular case.

#### **NOTIFICATION**

The Housing Authority shall provide written notification to applicants, participants, tenants, and landlords outlining the rights of victims at the time they apply for admission and with any notification of denial of admission, termination of assistance, and eviction.

#### **VAWA AND OTHER LAWS**

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking.

#### **AMENDMENT**

This Policy may be amended from time to time by the Housing Authority's Board of Commissioners.

**Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.** *Include statements related to these programs as applicable.*

**Conversion** – TGHA intends to convert all public housing to project based vouchers under the Rental Assistance Demonstration Program (RAD) as follows:

PROPERTY	TYPE	NUMBER OF PH UNITS	RAD REPOSITIONING STRATEGY
Charleston Place	Mixed Finance	20	Convert “as is”
Evergreen Place	Mixed Finance	75	Convert “as is”
Forest View	Mixed Finance	29	Convert “as is”
Nicholtown Place	Mixed Finance	38	Convert “as is”
Clark Street Apartments	Mixed Finance	27	Convert “as is”
Garden Apartments	PH – Elderly/Disabled	80	Convert “as is”
Ridgeway Apartments	PH – Elderly/Disabled	8	Convert “as is”
Brookhaven Apartments	PH - Family	55	Substantial Rehab
Westview Apartments	PH – Family	79	Substantial Rehab
Scattered Sites	PH – Family	129	Demo/Rehab/Dispo
<b>TOTAL</b>		<b>540</b>	

**Scattered Sites** – A detailed architect and engineering analysis of the condition of the 129 scattered site units is currently under way. It is anticipated that 20 scattered site houses are not viable for rehabilitation and will be proposed for disposition to enable sale via public bid; and the remaining 109 units will be substantially rehabilitated over a 1-3 year period. These numbers may vary slightly based on the final outcome of the architect/engineer analysis.

7.0

**Disposition** – TGHA intends to dispose of various properties through transfer to other entities as follows:

PROPERTY	DISPOSITION STRATEGY
Heritage (remaining land of JJT HOPE VI site)	Development of mixed finance elderly only project. Development partner has been selected.
Former Chamlee site	Dispose of this site at fair market value and utilize sales proceeds towards other affordable housing projects detailed herein.
Scott Towers site	Development of mixed finance project(s); elderly and multi-family.
Scattered Site vacant parcels	Construction of single family rental and for sale units.
Evergreen (3 acre parcel)	Sale or donation.
Arcadia (16 lots)	Construction of single family rental or for sale units.
Arcadia (12 acre parcel)	Sell at fair market value.
Brookhaven (vacant 3.53 acre parcel)	Development of mixed finance project(s); elderly
Brookhaven Apartments	Development of mixed finance project(s); multi-family
Westview Apartments	Development of mixed finance project(s); elderly and multi-family
Brookhaven (8.823 parcels)	Development of mixed finance project(s); multi-family and portions designated for sale or donation of land for public good.

*\*The housing authority will evaluate disposition of such property where it maybe not be in its best interest to solicit bids but sell to local municipalities for public good.*

**Project-based Vouchers**

Under the PBV program, the HHA may use up to 20 percent of Housing Choice Voucher program subsidy funds for project based assistance. This is known as “project-basing” what are otherwise known as tenant-based vouchers.

When HHA project-bases Section 8 Housing Choice Voucher program vouchers it allows owners to leverage the voucher subsidy. Thus, the HHA can use project-based vouchers to encourage new construction or rehabilitation or

	<p>to attach assistance to existing units to promote voucher utilization, expand housing choices, increase supportive housing options and deconcentrate poverty.</p> <p>In 2016 HHA may issue an RFP or non-competitively select PBV proposals through the process outlined in the Housing Choice Voucher Administrative Plan. TGHA will consider proposals in areas of the city that promote fair housing and deconcentration of poverty.</p>
<b>8.0</b>	<b>Capital Improvements.</b> Please complete Parts 8.1 through 8.3, as applicable.
<b>8.1</b>	<p><b>Capital Fund Program Annual Statement/Performance and Evaluation Report.</b> As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p> <p>See attachment (g) – 2013 Capital Fund Program – Annual Performance &amp; Evaluation Report  See attachment (h) – 2014 Capital Fund Program – Annual Performance &amp; Evaluation Report  See attachment (i) – 2015 Capital Fund Program – Annual Performance &amp; Evaluation Report  See attachment (j) - 2010 1<sup>st</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2011 1<sup>st</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2012 1<sup>st</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2013 1<sup>st</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2014 1<sup>st</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  See attachment (k) - 2009 2<sup>nd</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2010 2<sup>nd</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2011 2<sup>nd</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2013 2<sup>nd</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report  2014 2<sup>nd</sup> Increment RHF Fund- Annual Performance &amp; Evaluation Report</p>
<b>8.2</b>	<p><b>Capital Fund Program Five-Year Action Plan.</b> As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p> <p>See attachment (l) – FY 2015 Capital Fund Program 5 Year Action Plan  See attachment (m) – FY 2015-2019 Capital Fund Program Annual Statements</p>
<b>8.3</b>	<p><b>Capital Fund Financing Program (CFFP).</b></p> <p><input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>

**Housing Needs.** Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

**BARRIERS TO AFFORDABLE HOUSING**\_(2010-2015 Consolidated Plan City of Greenville)

Indicators determining housing problems and needs include:

1. **Housing Problems-** Although very low income households comprise 11.8% of renter households, they account for 32% of renter households with housing problems.
2. **Worst Case Needs** - There are certain households which are classified as those with worst case needs. This group is defined as those families that live in substandard housing, expending over 30% of their income for housing. Approximately 29.2% of households expended over 50% of their income for housing.
3. **Lack of Availability** - Very low and extremely low income households have the most difficulty finding affordable housing (for less than 30% of their income). This does not include however that there are too few units to meet the demand, or that housing production is falling short of increases in the number of households. While the overall supply of housing seems to be adequate, some specific categories of housing are in short supply. This supports the already identified problem that large families, needing at least three (3) bedrooms, have much more difficulty finding rental units.
4. **Affordability** - Nearly 23% of the lowest income renters have excessive rent burden, and over 58% have severe cost burden. As household income rises the incidence of affordability problems declines significantly.
5. **Special Needs** - The special needs population is typically an underserved group. They include frail elderly and elderly, disabled, mentally and physically challenged, persons living with HIV/AIDS, and those living with substance abuse problems

9.0

**HOUSING AUTHORITY WAITING LIST NEEDS:**

The chart below identifies families currently on the Housing Authority Public Housing (PH) and Housing Choice Voucher (HCV) waiting lists. As noted, there is a total of 4,454 households waiting for affordable housing.

<b>INCOME LEVEL</b>	<b>PH</b>	<b>HCV</b>	<b>TOTAL</b>	<b>%</b>
Extremely Low Income (<30%)	1543	1726	<b>3269</b>	<b>73</b>
Very Low Income (>30 - >50%)	349	485	<b>834</b>	<b>19</b>
Low Income (>50%)	106	127	<b>233</b>	<b>5</b>
Other	50	66	<b>116</b>	<b>3</b>
<b>TOTAL</b>	<b>2048</b>	<b>2404</b>	<b>4452</b>	<b>100</b>
<b>RACE</b>	<b>PH</b>	<b>HCV</b>	<b>TOTAL</b>	<b>%</b>
White	284	279	<b>563</b>	<b>13</b>
Black	1633	1909	<b>3542</b>	<b>80</b>
Other	131	216	<b>347</b>	<b>8</b>
<b>TOTAL</b>	<b>2048</b>	<b>2404</b>	<b>4452</b>	<b>100</b>
<b>HOUSEHOLD TYPE</b>	<b>PH</b>	<b>HCV</b>	<b>TOTAL</b>	<b>%</b>
Families with Children	1327	1622	<b>2949</b>	<b>66</b>
Elderly Households	84	130	<b>214</b>	<b>5</b>
Other	637	652	<b>1289</b>	<b>29</b>
<b>TOTAL</b>	<b>2048</b>	<b>2404</b>	<b>4452</b>	<b>100</b>

The waiting lists are consistent with the Barriers to Affordable Housing as identified by the Consolidated Plan and described above. Extremely low income households, minority households, and households with children have the greatest housing needs.



**Strategy for Addressing Housing Needs.** Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.**

**Strategy** - The Housing Authority has an aggressive development plan as detailed in Section 7 above which will result in the preservation of exiting affordable housing resources and construction of new affordable housing resources. In addition, the Housing Authority will closely monitor Housing Choice Voucher funding to maximize utilization, assisting the greatest number of households possible with available resources.

9.1

1. Maximize the number of affordable units available to the GHA within its current resources by:
  - a. Updating and reviewing policies at least annually;
  - b. Implement an occupancy strategy to reduce the turnaround time;
  - c. Continue and enhance the preventative maintenance program;
  - d. Maintain or increase HCVP lease-up rates by marketing the program to owners, particularly those outside the areas of minority and poverty concentration;
  - e. Participate in the Consolidated Plan process to ensure coordination with broader community strategies;
  - f. Monitor, purge and update waiting lists annually;
  - g. Market waiting list openings to the greater Greenville community in an effort to promote deconcentration. Market GHA programs and services to the community year round.
2. Increase the number of affordable housing units by:
  - a. Applying for Housing Choice Vouchers should they become available;
  - b. Identifying funding sources and mixed finance opportunities to create additional affordable housing units to our community;
  - c. Identifying opportunities through our community organizations and partners (Greenville Redevelopment Corporation),
3. Utilize deconcentration and marketing strategies to reach a diversified population and income levels.
4. Seek elderly designation for Garden Apartments:
  - a. Apply for special purpose vouchers targeted to the elderly should they become available;
  - b. Apply for vouchers for Families with Disabilities should they become available;
  - c. Apply for vouchers for Veterans (VASH) should they become available.
5. Create and/or maintain public/private partnerships:
  - a. City of Greenville
  - b. Local universities and community colleges
  - c. Local business community
  - d. Targeted Solutions
  - e. Workforce Development
  - f. Habitat for Humanity
  - g. Greenville Redevelopment Corporation
  - h. Greenville County Redevelopment Authority
6. Conduct activities to affirmatively further Fair Housing:
  - a. Work with the City staff to affirmatively further fair housing;
  - b. Counsel HCVP participants on fair housing;
  - c. Provide maps that clearly identify areas outside the poverty/minority concentration area.

10.0	<p><b>Additional Information.</b> Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <p>TGHA completed a comprehensive analysis of its portfolio by completing a Physical Needs Assessment which served as a guide in prioritizing and addressing long term deferred capital needs as they have been defined. Strong consideration has been given to the positive aspects of Demolition, Disposition, and Conversion options of the current portfolio.</p> <p>In 2014 TGHA applied for and was awarded a 9% LIHTC allocation from the SC State Housing Finance Agency for the development of The Manor at West Village, a 55 Unit 3 story senior building which will be located on vacant parcels adjacent to the Brookhaven Low Rent Public Housing Site. Closing occurred in February of 2015.</p> <p>TGHA received a second 9% LIHTC allocation from the SC State Housing Finance Agency for the development of Heritage at Sliding Rock, a 60 Unit 3 story senior building which will be located on the vacant parcels of the former JJT Public Housing development site. Closing is anticipated to occur in the spring of 2016.</p> <p>TGHA instrumentality, Greenville Redevelopment Authority anticipates applying for its 501©3 status to help in furthering its mission. Public/private partnership continue to forge within the greater Greenville community to ensure that our goals are achieved.</p>
10.0	<p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p><b>Significant Amendment or Modification</b> shall be defined as: major changes in the plans or policies of the Housing Authority that have a significant impact on the financial resources, the mission, goals, objectives or plans of the agency.</p> <p><b>I. Substantial Deviations from the 5-Year Plan</b></p> <ol style="list-style-type: none"> <li>1. Additions or deletions of Strategic Goals</li> <li>2. Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.</li> </ol> <p><b>II. Significant Amendments or Modifications to the Annual Plan</b></p> <ol style="list-style-type: none"> <li>1. Any Changes to Rent or admissions policies or organization of the waiting list;</li> <li>2. Additions of Non-Emergency work items (items not included in the latest approved PHA Plan Capital Fund Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds (if applicable) under the Capital Fund Program; and</li> <li>3. Any change with regard to demolition or disposition, designation or housing, homeownership programs or conversion activities.</li> <li>4. As part of the <b>Rental Assistance Demonstration (RAD)</b>, TGHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items: <ol style="list-style-type: none"> <li>a. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;</li> <li>b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and</li> <li>c. Changes to the financing structure for each approved RAD conversion.</li> </ol> </li> </ol>

Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.

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- a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations (which includes all certifications relating to Civil Rights)
- b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)
- c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
- d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only)
- e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)
- f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- g) Challenged Elements
- h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only)
- i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only)