

PHA 5-YEAR AGENCY PLAN



2015 –
2019

REVISION 1
December 23, 2014

PHA 5-Year and Annual Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB No. 2577-0226
Expires 8/30/2011

1.0	PHA Information PHA Name: HOUSING AUTHORITY OF THE CITY OF GREENVILLE, SC PHA Code: SC004 PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): 01/2015				
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 = 113 Project Based Voucher Allocations - Current Contract 108 - Current Commitment 220 (Brookhaven – Westview) - Anticipated Commitment 150 (Scott Towers Site) - Other TGHA Development 168				
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
4.0	PHA Consortia: <input type="checkbox"/> 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: <p style="text-align: center;"><i>“To provide quality affordable housing that serves as a foundation to improve lives.”</i></p>				

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.

GOALS FOR FY 2015 - 2019

I. REPOSITION THE PUBLIC HOUSING PORTFOLIO: To reposition our housing portfolio and lessen our dependence on federal funding we will continue to use the successes of the federal Mixed Finance program and the Rental Assistance Demonstration Program.

Heritage – This site is the remaining land on the former JJT HOPE VI Project. TGHA intends to solicit a new development partner and complete the development of approximately 72 senior units pursuant to the HUD approved Revitalization Plan and the City approved PUD amendment,

Chamlee – This site is a vacant parcel remaining after the demolition of the Chamlee Court public housing community. TGHA intends to dispose of this site at fair market value and utilize the sales proceeds towards the other affordable housing projects detailed herein.

Scott Towers/Garden Apartments – TGHA will complete a Master Plan for the site to include the redevelopment of Garden apartments. A new development partner will be procured to redevelop the site in accordance with the Master Plan. The existing Garden units will be converted from Public Housing to Project Based voucher units under the RAD Program.

Westview Homes & Brookhaven – TGHA secured a development partner for the redevelopment of these sites. The overall redevelopment plan will include four components:

- **Phase I – The Manor at West Village:** 55 unit new construction senior building.
- **Phase II – The Harbor at West Village:** Substantial rehabilitation of 57 multi-family units which includes the existing 55 units and 2 units currently used as the Resident Services Office; rehabilitation of the former Head Start Building for leasing; community space and Resident Services Offices.
- **Phase III – The Haven at West Village:** 42 unit new construction senior building and a new leasing and community building.
- **Phase IV – The Gallery at West Village:** demolition of 7 existing units; conversion of 18 one bedroom units to 12 units with art studios; and rehabilitation of the remaining 66 units.

Scattered Sites – Of the existing 129 scattered site units, 14 are infeasible for repositioning and will be sold or demolished; 15 units will be sold to the existing tenants; and the remaining 100 units will be substantially rehabilitated and converted to Project Based Vouchers under the RAD Program.

Ridgeway Apartments – This 8 unit's senior property will be converted from Public Housing to Project Based Vouchers under the RAD program.

Elderly Designation Plan – Submit a Designated Housing Plan to HUD for approval to designate Garden Apartments, Charleston Place, Ridgeway and Arcadia (Senior) as occupancy by only elderly families.

Project-Based Voucher Program – Maximize the 20% utilization of the Housing Choice Voucher Program for allocation of Project-Based Vouchers.

- Prioritize utilization efforts with TGA identified development initiatives.
- Analyze efforts with private and/or for-profit developers for allocating project based VASH Vouchers.

5.2

II. OPERATIONAL EFFECTIVENESS: The Greenville Housing Authority will continue to seek new business systems and improve existing work processes through an emphasis on technological innovations designed to improve customer service, enhance communication and reduce administrative burden and intensity of paperwork.

1. Upgrade antiquated communications infrastructure to include computer hardware/software, phone system, network, etc.
2. Secure Paperless Workflow Technology to increase operational efficiency.
 - a) Continue implementation of paperless system in the Section 8 Housing Choice Voucher Department and begin incorporating paperless systems in the Low Rent Public Housing Department.
 - b) Implement electronic signatures that comply with regulations, expedite business processes, and reduce operational costs.
3. Update the agencies website and link it to a web portal that has access to the following portals
 - a) Landlord Portal for the Section 8 Housing Choice Voucher Program
 - b) Tenant Portal for Low Rent Public Housing Residents
 - c) Tenant Portal for Section 8 Housing Choice Voucher Program participants
 - d) Applicant Portal for Low Rent Public Housing and Section 8 Housing Choice Voucher applicants.
4. Create a Point of Purchase System for goods and services and eliminate/reduce on site inventory.
5. Secure Office location for Scattered Site Units.

III. ENTREPRENEURIALISM:

1. Sustainability through Diversification:
 - a) Maximize use of Resources: Leverage current real estate assets to maximize return on investment that will assure organizational sustainability to continue to achieve the overall mission of the organization.
 - b) Partnerships: Seek private public partnerships that maximize investment and seek new opportunities to generate additional revenue.
2. Sound Business Practices:
 - a) Superior Property Management: Exemplify qualities of a superior property management organization with regard to maintenance standards, tenant relations, leasing and communication and financial performance.
 - b) Superior Non-Profit Management: Exemplify the qualities of a superior non-profit organized for public benefit. Focus will be retained on effective, accessible services and community building practices that increase stability and self-sufficiency of TGHA residents.

- c) Superior Administration: Administer the rent subsidy program with specific focus on program integrity, participant and owner relations, responsiveness to community needs and financial performance
- d) Superior Public Management: Exemplify the qualities of a well-run public agency through efficiency, fairness and integrity; TGHA will promote values and practices in support of fairness among people of all races and classes.

IV. MARKETING: Enhance TGHA’s brand as a housing development entity through an effective marketing and communications plan.

1. Strategically communicate TGHA’s successes, initiatives and capabilities to local leaders, businesses and stakeholders and partners in an effort to enhance the awareness of TGHA’s capabilities and contributions.
2. Create marketing material to reflect TGHA’s new corporate brand (brochures, business cards, etc.,)
3. Increase TGHA’s Internet presence to communicate with our partners and customers (link website to business portals for vendors, landlords, tenants and applicants).
4. Effectively utilize social media (twitter, Linked In, Facebook, etc.,) to market and enhance TGHA’s Brand.
5. Host and/or ensure an active presence in housing related events (April – Fair Housing Month, June – Homeownership Month).
6. Publish an Annual Report, highlighting the agencies successes and initiatives.

V. RESIDENT STRATEGIES: Assist residents in gaining access to education, employment opportunities and homeownership opportunities.

1. Maintain Arcadia and other identified communities as stabilized homeownership communities.
2. Expand homeownership opportunities through the sale of 15 units.
3. Expand homeownership opportunities through the Section 8 Homeownership Program.
4. Partner in an active advocacy role with local schools and colleges to facilitate access to educational opportunities for tenants.
5. Ensure compliance with Section 3 in ensuring to the greatest extent possible, job training, employment, and contract opportunities are made available to low- or very-low income residents in connection with projects and activities in the neighborhoods where HUD funds are expended.
6. Update the Low Rent Public Housing Lease Agreement.
7. Enhance safety and security efforts for TGHA residents and the surrounding neighborhoods through active participation with the Crime Free Multi-Family Housing Program.

VI. VIOLENCE AGAINST WOMEN: To protect the rights of victims of domestic violence, dating violence, and stalking to secure and maintain housing without being victimized a second time by being denied housing or losing housing because of the criminally violent acts perpetrated against them.

5.2

1. Ensure that all applicants and participants of the Housing Authority know of their rights under the VAWA.
2. Implement VAWA as victims come forward to claim their rights.
3. Educate participating landlords to assist them to protect the rights of victims and to avoid evictions where the victim can certify they qualify for protection.
4. Link victims with resources in the community that can assist them with services.
5. Work with the Domestic Violence Shelter to develop housing options for victims of domestic violence.
6. Policies prescribed in the Public Housing Admissions for Continued Occupancy and the Section 8 HCV Program Administrative Plan will ensure the following;
 - a. TGHA will not knowingly deny assistance to otherwise eligible applicants simply because they have been victims of domestic violence, dating violence, sexual assault, or stalking.
 - b. TGHA will not knowingly terminate the assistance of otherwise compliant persons simply because they are victims of domestic violence, dating violence, sexual assault, or stalking.
 - c. TGHA will educate applicants and participants of their rights under VAWA.
 - d. TGHA will work to educate landlords about VAWA and the rights of victims under the act and to work with the landlord and the victims to protect the housing assistance of victims and their families.

5.2

PROGRESS IN ACHIEVING PREVIOUS 5-YEAR PLAN GOALS

1. Implementation of Lock-Box Rent Payment System (full implementation on 3/1/2009)
Public Housing rent collection by lock-box has been fully implemented
2. Implementation of ACH for Section 8 HAP
All landlords are currently enrolled into the ACH Payment System for receipt of their monthly HAP Payment.
3. Minimize TAR's (1.5% max.)
The effort continues to reduce TAR's to a goal of 1.5% (currently at 2%)
4. Decrease Turnaround Days (10 days)
Turnaround days authority-wide average days is currently 48.14. The turnaround time days mostly encompass units currently off-line and being prepared for renovation.
5. Improve Property Appearance to enhance marketability
The repositioning strategies discussed in Section I above will enhance marketability
6. Improve the Quality of Maintenance (New staff members and new focus)
Quality of Maintenance has been greatly improved with the addition of skilled professionals
7. Complete a Physical Needs Assessment (completed)
The Physical Needs Assessment was completed in 2012

8. Disposition of Scattered Sites to facilitate use of HCV
The repositioning strategy in Section I above will result in disposition of 14 units; sale of 15 units and rehabilitation of the remaining 100 units which will convert to Project Based Voucher under the RAD Program.
9. Successful Implementation /Operation of AMP-Based Management
AMP Based Management has been implemented and is fully operational
10. Successful Implementation of new Software (to begin 7/2009)
New software has been implemented and is fully operational
11. Conversion of Arcadia Community Bldg. to Accessible Housing(plans in process)
Conversion of Arcadia Community Building to rental units is complete
12. Acquire additional vouchers through State (\$175,000 awarded March 2009) & other sources/
60 VASH vouchers have been allocated to the Authority.
13. Assess the Viability of Scott Towers
A comprehensive assessment of the viability of Scott Towers SC 4-5 has been performed and as a result tenants were relocated, a demolition application was submitted to HUD and approved, and the building was imploded.
14. Purchase a building and consolidate the Central Office and the HCV Programs into one building.
Completed
15. Operational Improvements:
 - Overall
 - a. VAWA = TGHA has taken the following steps to assure that each tenant/client and landlord is aware of the content of the Violence Against Women Act:
 - Each of the above indicated persons have been, and continue to be, provided with information relative to VAWA regarding their individual rights and/or responsibilities
 - TGHA adopted a VAWA Policy and has posted it in each office of the Agency.
 - Each office has been provided with Certification Form 50066 to make available to residents/clients as needed.
 - Information providing the name and phone number of a local agency specializing in domestic violence intervention is posted in each TGHA Office.
 - Low Rent Public Housing:
 - a. Updated the Admissions for Continued Occupancy Plan
 - b. Repayment Agreements were eliminated from the ACOP.
 - c. In FY 2014 the ACOP was amended to comply with the stator changes pursuant to the 2014 Appropriations Act (Flat Rents).
 - Housing Choice Voucher
 - a. Updated the Section 8 Administrative Plan
 - b. Repayment Agreements were eliminated from the Administrative Plan.
 - c. Revised Family Obligations

PHA Plan Update

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

- I. The Public Housing Admissions of Continued Occupancy Plan was revised to comply with the statutory changes pursuant to the 2014 Appropriations Act (Flat Rent).

TGHA set the flat rental amount for each public housing unit that complies with the requirements that all flat rents be set at no less than 80% of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utility costs. The new flat rental amount will apply to all new program admissions effective July 1, 2014. For current program participants that pay the flat rental amount, effective October 1, 2014 the new flat rental amounts will be offered, as well as the income based rental amount, at the next annual rental option.

TGHA will place a cap on any increase in a family's rental payment that exceeds 35%, and is a result of change to the flat rental amount as follows:

- Multiply the existing flat rental payment by 1.35 and compare that to the updated flat rental amount;
- TGHA will present two options to the family as follows:
 - The lower of the product of the calculation and the updated flat rental amount; and
 - The income-based rent.

- II. The Section 8 Housing Choice Voucher Program Administrative Plan was revised to include a section specifically for the Veterans Affairs Supportive Housing (VASH) Program.

- 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 Greenville Housing Authority 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 fund 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.

6.0

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.

PROJECT BASED VOUCHERS RESIDENT RIGHTS AND PARTICIPATION

6.0

1. **No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
2. **Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner’s offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.
3. **Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.
4. **Phase-in of Tenant Rent Increases.** If a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Five Year Phase in:

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5: AR and all subsequent recertifications – Full standard TTP

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

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing. ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. Resident Participation and Funding. In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

6.0

a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:

- i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR §982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but **are** not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

PBV: Other Miscellaneous Provisions

- 1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
- 2. Additional Monitoring Requirement.** The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.
- 3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.
- 4. Establishment of Waiting List.** In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants,

PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA’s policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.
6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)
8. **Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

(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

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

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”
Nichol town 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

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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 12 scattered site houses are not viable for rehabilitation and will be demolished; 26 will be proposed for disposition to enable sale of the unit to the existing tenants; and the remaining 88 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.

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 the 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)	Sale 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.

8.0 **Capital Improvements.** Please complete Parts 8.1 through 8.3, as applicable.

8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. 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) – 2012 Capital Fund Program – Annual Performance & Evaluation Report See attachment (h) – 2013 Capital Fund Program – Annual Performance & Evaluation Report See attachment (i) – 2014 Capital Fund Program – Annual Performance & Evaluation Report See attachment (j) - 2010 1st Increment RHF Fund- Annual Performance & Evaluation Report 2011 1st Increment RHF Fund- Annual Performance & Evaluation Report 2012 1st Increment RHF Fund- Annual Performance & Evaluation Report 2013 1st Increment RHF Fund- Annual Performance & Evaluation Report 2014 1st Increment RHF Fund- Annual Performance & Evaluation Report See attachment (k) - 2009 2nd Increment RHF Fund- Annual Performance & Evaluation Report 2010 2nd Increment RHF Fund- Annual Performance & Evaluation Report 2011 2nd Increment RHF Fund- Annual Performance & Evaluation Report 2013 2nd Increment RHF Fund- Annual Performance & Evaluation Report 2014 2nd Increment RHF Fund- Annual Performance & Evaluation Report</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. 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>
8.3	<p>Capital Fund Financing Program (CFFP). <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:

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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

HOUSING AUTHORITY WAITING LIST NEEDS:

The chart to the right identifies families currently on the Housing Authority Public Housing (PH) and Housing Choice Voucher (HCV) waiting lists. As noted, there is a total of 6,049 households waiting for affordable housing.

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

INCOME LEVEL	PH	HCV	TOTAL	%
Extremely Low Income (<30%)	1626	2820	4446	73%
Very Low Income (>30 - <50%)	339	809	1148	19%
Low Income (>50%)	96	298	394	7%
Other	17	44	61	1%
TOTAL	2078	3971	6049	100%
RACE	PH	HCV	TOTAL	%
White	295	497	792	13%
Black	1756	3430	5186	86%
Other	27	44	71	1%
TOTAL	2078	3971	6049	100%
HOUSEHOLD TYPE	PH	HCV	TOTAL	%
Families with Children	1276	2558	3834	63%
Elderly Households	88	179	267	4%
Other	714	1234	1948	32%
TOTAL	2078	3971	6049	100%

<p>9.1</p>	<p>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.</p> <p>Strategy - The Housing Authority has an aggressive development plan as detailed above 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 within with available resources.</p>
<p>10.0</p>	<p>Additional Information. 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 the former Brookhaven Low Rent Public Housing Site. Closing is anticipated to occur in the Spring of 2015.</p>

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

Significant Amendment or Modification 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.

I. Substantial Deviations from the 5-Year Plan

1. Additions or deletions of Strategic Goals
2. Any deviation that requires reviews and input by the Resident Advisory Board as well as approval by the Board of Commissioners.

II. Significant Amendments or Modifications to the Annual Plan

1. Any Changes to Rent or admissions policies or organization of the waiting list;
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
3. Any change with regard to demolition or disposition, designation or housing, homeownership programs or conversion activities.
4. As part of the **Rental Assistance Demonstration (RAD)**, TGHA is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:
 - 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;
 - b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
 - c. Changes to the financing structure for each approved RAD conversion.

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