

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 Agreement 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 does not 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 agreement shall be permitted for any remaining Public Housing debts owed upon completion of the program transfer.

6.0

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 and to the HUD Inspector General. TGHA will take all action available under federal and state laws to collect any debt owed.

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.

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

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

7.0

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	Development of market rate multi-family with project based vouchers. In discussion with Development Partner.
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.

<p>8.1</p>	<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) –2013 Capital Fund Program – Annual Performance & Evaluation Report See attachment (h) –2014 Capital Fund Program – Annual Performance & Evaluation Report See attachment (i) – 2015 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>
<p>8.2</p>	<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>
<p>8.3</p>	<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:

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 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 4,454 households waiting for affordable housing.

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

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.

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 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.

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. Apply for Housing Choice Vouchers should they become available;
 - b. Identify funding sources and mixed finance opportunities to create additional affordable housing units to our community;
 - c. Identify 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>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 occurred in February of 2015.</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>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.</p> <p>I. Substantial Deviations from the 5-Year Plan</p> <ol style="list-style-type: none"> 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. <p>II. Significant Amendments or Modifications to the Annual Plan</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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.
------	--

11

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.

- 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)