

Streamlined Annual PHA Plan (High Performer PHA's)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

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

A.	PHA Information.
A.1	<p>PHA Name: <u>HOUSING AUTHORITY OF THE CITY OF GREENVILLE, SC</u> PHA Code: <u>SC004</u></p> <p>PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>01/2020</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>155</u></p> <p>Number of Housing Choice Vouchers (HCVs) <u>3049</u></p> <p>Total Combined <u>3204</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p>

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The 2020 Annual Plan is available at the following locations:

- **Administrative Office – 122 Edinburgh Court, Greenville, SC 29607**
- **TGHA’s website at <https://www.tgha.net/annual-plans>**

PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs.
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Homeownership Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Substantial Deviation.
- Significant Amendment/Modification

(b) The PHA must submit its Deconcentration Policy for Field Office Review.

Deconcentration policies are located in Exhibit 1.

(c) If the PHA answered yes for any element, describe the revisions for each element below:

Financial Resources for 2020 are located in Exhibit 2.

B.2 New Activities.

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

- | Y | N | |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Hope VI or Choice Neighborhoods. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Mixed Finance Modernization or Development. |
| <input type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Tenant Based Assistance. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Conversion of Public Housing to Project-Based Assistance under RAD. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Project Based Vouchers. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). |

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

CONVERSION OF PUBLIC HOUSING TO TENANT BASED ASSISTANCE

TGHA has a total of 155 remaining public housing units. We intend to submit a voluntary conversion application for all of these remaining units and exit the Public Housing Program in 2020.

PROJECT BASED VOUCHERS DESCRIPTION

TGHA will continue to administer a Project Based Voucher Program and in 2020, anticipates project basing units at the following properties in which TGHA has an ownership interest upon approval of the voluntary conversion application.

1. Evergreen Place – 75 units
2. Clark Ridge – 27 units
3. Nicholtown Green – 38 units
4. Harbor – 12 units
5. Manor – 3 units

In addition, TGHA intends to make PBV commitments for new developments that we anticipate commencing in 2020 which include the following.

1. Haven at West Greenville – 40-50 units
2. Completion of units at Arcadia Hills – 16 units

B.3 Progress Report.

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

Progress report is located in Exhibit 3

<p>B.4</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: N/A</p>
<p>Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p style="text-align: center;">50077 Certification is located in Exhibit 4</p>
<p>C.2</p>	<p>Civil Rights Certification.</p> <p><u>Form 50077-ST-HCV-HP</u>, <i>Certification of Compliance with PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p style="text-align: center;">50077 Certification is located in Exhibit 4</p>
<p>C.3</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p style="text-align: center;">Resident Participation, RAB Comments and Public Hearing Information are located in Exhibit 5.</p>
<p>C.4</p>	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SL</u>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p style="text-align: center;">50077 SL is located in Exhibit 6.</p>

D	Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
D.1	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. HUD Form 50075.2 approved by HUD on 12/12/2018 in the EPIC System.

2020 AGENCY PLAN – EXHIBIT 1

Housing Authority of the City of Greenville

Deconcentration Policy

It is the policy of The Greenville Housing Authority to provide for deconcentration of poverty and income mixing by targeting higher income tenants into areas where lower income residents reside and lower income tenants into areas where higher income residents reside. TGHA will accomplish this through aggressive marketing for use of tenant based vouchers and monitoring income at Project Based Voucher properties.

The Housing Authority has an aggressive development plan which will result in the preservation of existing 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.

- 1. Maximize the number of affordable units available to TGHA 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 opening to the greater Greenville community in an effort to promote deconcentration. Market TGHA programs and services to the community year-around.

- 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 partner (Greenville Redevelopment Corporation)

- 3. Utilize deconcentration and marketing strategies to reach a diversified population and income levels.**

- 4. Expand opportunities for special needs populations.**
 - 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 Corporation

2020 AGENCY PLAN – EXHIBIT 2
Housing Authority of the City of Greenville
2020 Financial Audit and Resources

1. **Audit Result Statement** – A copy of the 2018 financial audit result statements is attached.
2. **Financial Resources** – Below is a summary of the anticipated financial resources for 2020.

INDEPENDENT AUDITORS' REPORT

Board of Commissioners
The Housing Authority of the City of Greenville
Greenville, South Carolina

Report on the Financial Statements

We have audited the accompanying financial statements of The Housing Authority of the City of Greenville, South Carolina as of and for the year ended December 31, 2018, and the related notes to the financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Authority's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the Authority as of December 31, 2018, and the respective changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Accounting principles generally accepted in the United States of America require that Management's Discussion and Analysis on pages 7 through 14 be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.


Other Information

Our audit was performed for the purpose of forming an opinion on the financial statements that collectively comprise the Authority's basic financial statements. Supplementary data is presented for purposes of additional analysis and is not a required part of the basic financial statements. The accompanying Financial Data Schedule is presented for the Department of Housing and Urban Development's information and is not a required part of the basic financial statements. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, and is not a required part of the basic financial statements.

The Financial Data Schedule, the Schedule of Expenditures of Federal Awards and other supplementary data are the responsibility of management and were derived from and relate directly to the underlying accounting data and other records used to prepare the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting data and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated July 25, 2019 on our consideration of the Authority's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.



Birmingham, Alabama
July 25, 2019

**HOUSING AUTHORITY OF THE CITY OF GREENVILLE, SC
2020 ANNUAL AGENCY PLAN
EXHIBIT 2 - FINANCIAL RESOURCES**

SOURCE	ESTIMATED AMOUNT
Federal Grants	
Public Housing Operating Fund	\$0
Public Housing Capital Funds	\$0
Housing Choice Voucher Housing Assistance Funds	\$21,431,259
Family Self-Sufficiency Coordinator Grants	\$70,000
Prior Year Federal Grants (Carry-Over)	
2018 Capital Fund Grant	\$728,600
2019 Capital Fund Grant	\$580,038
Public Housing Dwelling Rental Income	\$0
Other Income	
Housing Choice Voucher Administrative Fees	\$1,676,376
Non-Federal Sources	
Fees Earned	\$588,918
Business Activities	\$392,673
TOTAL ALL ESTIMATED FINANCIAL SOURCES 2020	\$25,467,864

2020 AGENCY PLAN – EXHIBIT 3
Housing Authority of the City of Greenville
Progress on Goals

FIVE YEAR GOALS

Below is a summary of the progress achieved in each of the goals established in TGHA’s Five Year Agency Plan covering 2015 through 2019.

1. RESPOSITION THE PUBLIC HOUSING PORTFOLIO

- a. Heritage Site – A new 60-unit senior building was completed and opened in 2017.
- b. Chamlee Site – This site remains “land-banked” until such time that the site can be sold at Fair Market Value or otherwise redeveloped.
- c. Scott Towers/Garden Apartments – The Preserve at Logan Park, Phase I of the Scott site redevelopment closed in February 2019 and is expected to be completed in July 2020. Planning for Phase II is expected to be underway in late 2020.
- d. Westview Homes/Brookhaven – The Manor at West Greenville, a 55-unit senior building was completed and opened in 2015. The Gallery at West Greenville, a 66-unit arts community and The Harbor, a 57-unit family community, were completed and opened in 2017. Additional development to occur at the former Westview site includes the Haven at West Greenville, a 42-unit development to serve seniors. Additional development planned for the former Brookhaven site includes 12 units of housing for individuals with special needs.
- e. Scattered Sites, Ridgway and Arcadia Hills – RAD conversion of these Public Housing communities was completed in 2017.
- f. Heritage Communities (Forest View, Clark Ridge, Nicholtown and Evergreen) – Forest View as converted under RAD in 2018. The remaining three properties will be repositioned under the Voluntary Conversion program which was streamlined by HUD in 2019.

2. OPERATIONAL EFFECTIVENESS

- a. Upgrade Communications Systems – All communication systems have been upgraded and a conversion to a new operational software platform is scheduled for completion by the end of 2019.
- b. Secure Paperless Workflow – All program operations are paperless with electronic tenant files and records.
- c. Upgrade Website – A new website was implemented in 2016 and is continuously updated. Partner portals were launched and are available through the website.
- d. Point of Purchase System – All inventory was depleted and all goods are secure through a point of purchase system as needed; all work orders are electronic using a mobile telephone system.

3. ENTREPRENEURIALISM

- a. Sustainability through Diversification – Real estate assets have been diversified converting all Public Housing to Project Based Vouchers. Financing for new real estate transactions has included 9% and 4% LIHTC equity; tax exempt bonds and loans; National Housing Trust Funds; State HOME funds; State Department of Mental Health Housing funds; Federal Home Loan Bank Affordable Housing Funds; Community Works funds; and, Greenville housing Funds.

- b. Partnerships – TGHA has created over 400 new housing units in partnership with for profit private developers over the past 5 years.
- c. Sound Business Practices with Superior Property Management – TGHA has engaged third party property management firms while building internal capacity for Property Management of the newly diversified real estate portfolio.

4. MARKETING

- a. Marketing and Communication Plan – TGHA rebranded the Authority and implemented a comprehensive communication plan through the new website; effective use of social media; ongoing e-mail blasts; issuance of annual reports; participation on community events and increased visibility and transparency throughout the community.

5. RESIDENT STRATEGIES

- a. Homeownership – TGHA reopened the HCV homeownership program and significantly increased the number of individuals working towards homeownership as a goal in the Family Self-sufficiency Program.
- b. Advocacy – Partnerships with local schools were established to increase communication between schools and TGHA communities and increase parent engagement with schools. Multiple educational programs were developed or supported by TGHA to expand resident access and opportunity.
- c. Section 3 – TGHA increased its oversight of Section 3 compliance requirements by all vendors to assure additional employment opportunities.
- d. Security – TGHA worked with third party Property Management agents to assure participation in the City of Greenville Crime-Free Multi-Family Housing Program. Relationships with community officers for all TGHA managed properties were also strengthened through active participation of officers at community meetings and resident activities.

2020 AGENCY PLAN – EXHIBIT 4
Housing Authority of the City of Greenville
HUD Form 50077 ST-HCV-HP

Compliance with PHA Plan and Civil Rights Certification

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ X ___ Annual PHA Plan for the PHA fiscal year beginning **JANUARY 1, 2020**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Greenville, SC
PHA Name

SC004
PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2020

5-Year PHA Plan for Fiscal Years 20__ - 20__

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Authorized Official Peter Byford	Title Chairman
Signature	Date

2020 AGENCY PLAN – EXHIBIT 5
Housing Authority of the City of Greenville
Resident Participation
RAB Comments
Public Hearing Documentation

To be inserted upon completion of meetings and comment period.

2020 AGENCY PLAN – EXHIBIT 6
Housing Authority of the City of Greenville
HUD Form 50077SL

Certification by Local Official of Consistency with the Consolidated Plan

**Certification by State or Local
 Official of PHA Plans Consistency
 with the Consolidated Plan or
 State Consolidated Plan
 (All PHAs)**

U. S Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, **John F. McDonough**, the **City Manager** certify that the 5-Year and/or Annual PHA Plan
Official's Name *Official's Title*

the **Housing Authority of the City of Greenville, SC** is consistent with the Consolidated Plan and
 the Analysis of Impediments (AI) to Fair Housing Choice of the **City of Greenville** pursuant to
 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
 Consolidated Plan and the AI.

The Consolidated Plan and Analysis of Impediments identifies the largest housing issue for the
 residents of the City of Greenville is housing cost burden with many low-income residents paying
 more than 30% of their income on housing costs. Housing rehabilitation and creation of additional
 affordable housing can help alleviate the housing cost burden for residents.

The Housing Authority's goals to reposition its Public Housing portfolio provides for the
 preservation and stabilization of existing affordable housing. TGHA's plans for development of
 additional housing utilizing Project Based Vouchers is consistent with the goals of creating additional
 affordable housing.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will
 prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
John F. McDonough	City Manager
Signature	Date

2020 AGENCY PLAN – EXHIBIT 7

Housing Authority of the City of Greenville

VAWA Policies

The Violence Against Women Reauthorization Act of 2013 (VAWA 2013) and the VAWA Reauthorization of 2019 expands housing protections for victims of domestic violence, dating violence, sexual assault or stalking. Changes under VAWA include extending protections to survivors of sexual assault; allowing survivors who remain in the unit to establish eligibility or find new housing when a lease is bifurcated; providing survivors with emergency transfers; and additional notification to applicants and tenants of housing rights under VAWA. While these changes substantially extend VAWA's coverage to include most affordable housing programs, they provide no protection to tenants in private market-rate housing but do apply to tenants with vouchers in private market-housing.

TGHA will provide all protection under VAWA as described below to program participants and family members of program participants who are victims of domestic violence, dating violence, sexual assault or stalking from being evicted or terminated from housing assistance based on acts of such violence against them.

Parties whom VAWA protects - VAWA expands the housing protections to cover survivors of sexual assault and protects anyone who:

- Is a victim of actual or threatened domestic violence, dating violence, sexual assault or stalking, or an “affiliated individual” of the victim (spouse, parent, brother, sister, or child of that victim; or an individual to whom that victim stands in loco parentis; or an individual, tenant or lawful occupant living in the victim's household); and,
- Is living in, or seeking admission to, any of the covered housing programs.

VAWA eliminates the requirement that the household member be related by blood or marriage to the victim. Therefore, VAWA 2013 protects individuals who simply live in the victim's household, regardless of whether they are related by marriage or blood to the victim.

Definitions - The new law revises the definition of “domestic violence” to include crimes of violence committed by an intimate partner of the victim or by a person who has cohabitated with the victim as an intimate partner. VAWA further amends the definition of “stalking” by including a more general definition than had previously been provided. VAWA now defines the terms in the following manner:

Domestic violence includes felony or misdemeanor crimes of violence committed by:

- A current or former spouse or intimate partner of the victim;
- A person with whom the victim shares a child;
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies; or
- Any other person who committed a crime against an adult or youth victim who is protected under the domestic or family violence laws of the jurisdiction.

Dating violence is violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- The existence of such a relationship is determined based on the following factors:
 - Length of the relationship
 - Type of relationship
 - Frequency of interaction between the persons involved in the relationship.

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

Stalking is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for his or her safety or others; or
- Suffer substantial emotional distress.

Denials of Admissions, Termination of Tenancy or Assistance - An applicant or tenant shall not be denied admission to, denied assistance under, terminated from participation in, or evicted from housing on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. An incident of actual or threatened domestic violence, dating violence, sexual assault or stalking will not be construed as a serious or repeated violation of the lease by the victim and will not be good cause for terminating the assistance or tenancy of the victim.

Criminal Activity Directly Related to the Abuse - No person shall be denied assistance, tenancy or occupancy rights to housing solely on the basis of criminal activity, if that activity is directly related to domestic violence, dating violence, sexual assault or stalking engaged in by a household member, guest or any person under the tenant's control, if the tenant or affiliated individual of the tenant is the victim.¹⁴

Actual and Imminent Threat – TGHA may terminate assistance to a victim if TGHA can demonstrate an actual and imminent threat to other tenants or employees at the property in the event that the tenant is not evicted or terminated from assistance. An actual and imminent threat shall include a physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm. In determining the existence of an “actual or imminent threat,” TGHA will consider the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

Termination of a victim's assistance under this provision will occur only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, permitting a participant to move to another location, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat.

Victims Held to Same Standard - For program violations unrelated to the abuse, TGHA, will not subject a participant who is a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard than other participants in determining whether to terminate assistance.

Bifurcation – TGHA may bifurcate voucher to terminate assistance to any tenant or lawful occupant who engages in criminal acts of violence against an affiliated individual or others. This action may be taken without penalizing the survivor who is also a tenant or lawful participant.

If TGHA terminates assistance to a participant because of criminal acts of violence against family members or others, and that individual is the only family member eligible to receive the housing assistance, then any remaining family member will have the opportunity to establish eligibility for the assistance. If no family member can establish such eligibility, then TGHA will provide the participant 60 days to find new housing.

Portability – TGHA will permit a family with a Housing Choice voucher to move to another jurisdiction if the family has complied with all other obligations of the program and is moving to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence or stalking. TGHA will permit the family to move even if the family's lease term has not yet expired.

Court orders – TGHA will honor court orders addressing rights of access to or control of property, including civil protection orders issued to protect the victim, as well as orders addressing the distribution or possession of property among household members in a case.

Certification – TGHA will request that an individual certify via the applicable HUD form or other such written documentation as defined in this section. This certification will: (1) state that an applicant or tenant is a victim of domestic violence, dating violence, sexual assault or stalking; (2) state that the incident that is the ground for protection meets the requirements under the statute; and (3) include the name of perpetrator, if the name is known and safe to provide. In lieu of the certification form, the applicant or participant may provide:

- Documentation signed by the victim and a victim service provider, an attorney, a medical professional, or a mental health professional in which the professional attests under penalty of perjury to his or her belief that the victim has experienced an incident of domestic violence, dating violence, sexual assault or stalking that meets the grounds for protection under the statute; or
- A federal, state, tribal, territorial, or local law enforcement, court or administrative record.

Timeline - After TGHA has requested certification in writing, an applicant or participant shall have 30 days to respond to the request. If an individual does not provide the documentation within the 30 days, TGHA will deny admission or terminate assistance.

Conflicting Certification - In situations where TGHA receives documentation with conflicting information, TGHA will require an applicant or participant to submit any of the above-mentioned third-party documentation.

Confidentiality – TGHA will keep confidential the information an individual provides to certify victim status, including the individual's status as a victim. This information will be entered into a shared database or disclosed to another entity or individual, unless the disclosure is: requested or consented to by the individual in writing; required for use in a termination proceeding to determine whether the incident qualifies as a serious or repeated violation of the lease, good cause to terminate assistance or tenancy, or criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking; or otherwise required by law.

No TGHA employee shall access the information regarding domestic violence unless they are specifically and explicitly authorized to access this information because it is necessary for their work.

Notification and Language Access - TGHA will provide the applicable HUD notice accompanied by the certification form to applicants and participants: (1) at the time an applicant is denied admission; (2) at the time the individual is admitted; and (3) with any notification of termination of assistance. In addition, the HUD notice must be available in multiple languages and be consistent with HUD guidance concerning language access for individuals with limited- English proficiency.

PHA Plan - TGHA will include in its annual plan a description of any activities, services, or programs being undertaken to assist victims of domestic violence, dating violence, sexual assault or stalking. In addition, TGHA will include in its five-year plan a description of any goals, objectives, policies, or programs it uses to serve victims' housing needs.

2020 AGENCY PLAN – EXHIBIT 8
Housing Authority of the City of Greenville
Other Certifications

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Program/Activity Receiving Federal Grant Funding

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Title

Signature

Date

X

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Program/Activity Receiving Federal Grant Funding

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Title

Signature

Date (mm/dd/yyyy)

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, <i>if known</i> : Congressional District, if known:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, <i>if applicable</i> : _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ _____	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i>	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)