

Annual PHA Plan
(Standard PHAs and Troubled PHAs)

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

OMB No. 2577-0226
Expires: 02/29/2016

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. The plans inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only 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 if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing Asset Management 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>The Housing Authority of the City of Spartanburg</u></p> <p>PHA Code: <u>SC003</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2021</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>528</u> Number of Housing Choice Vouchers (HCVs) <u>2,650</u> Total Combined Units/Vouchers <u>3,268</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C 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. 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.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 15%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 25%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 15%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B.	Annual Plan Elements
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B.
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Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation. Need to review (review HUD's definition)
- Significant Amendment/Modification

Statement of Housing Needs and Strategy for Addressing Housing Needs

Spartanburg Housing strives to assist in addressing the needs of low-income, very low-income and extremely low-income families in the City of Spartanburg and Spartanburg County. Spartanburg Housing does this through its Asset Management Program, Housing Choice Voucher (HCV) Program, , and other Affordable / Moderate Income Programs and HUD's Rental Assistance Demonstration (RAD) program.

There continues to be a need for affordable housing programs provided by the PHA as evidenced by occupancy rates in assisted housing as well as by response to wait list openings for Public Housing, HCV and Affordable Housing within the jurisdiction.

Spartanburg Housing serves over 3,608 families under its various housing programs (See Table 1 below):

Table 1

Housing Programs	Units	Vouchers
Public Housing	528	
Housing Choice Voucher (HCV) HCV (Voucher Program)		2138
Affordable/Moderate Income	345	
RAD - PBV		367
RAD - PBRA	80	
VASH		5
Total	953	2510

Families served are within the maximum income limit of the 80% median family income for Spartanburg County. Rent payments are based on adjusted annual income. There are currently waiting lists for admission. (See Table 2)

Table 2

Waiting List by Program	
Asset Management	5,482
HCV	3,131
Project Base	32
Affordable/Moderate Income	133
RAD	11,880
VASH	0
Total	19,154

The 2020 Median Income for the Spartanburg, SC MSA is \$64,700. Income Limits are based on the family size or number of persons in the family. Currently, 41 percent of Spartanburg Housing households consist of only one member. The area median income limit (AMI) in the Spartanburg, SC, MSA (Metropolitan Statistical Area) is 30 percent for a family with three is \$20,780. In the Asset Management programs, 86 percent fall below this limit. The Housing Choice Voucher (HCV) participants are at 92% AMI.

In 2019, Spartanburg Housing opened the HCV waiting list to families. Households of various races and ethnic groups of families on our waiting lists for Asset Management account as 25.14% White, 72.24% Black, .49% Asian, .33% American Indian and 1.8% Hispanic. Housing Choice Voucher (HCV) Program waiting lists total as 20.93% White, 71.39% Black, .54% Hispanic and other 2.24%.

Affordability

Like many South Carolina communities, affordability is by far the largest housing problem in Spartanburg. The most recent Census estimates show 45.7% of renters and 23.2% of homeowners pay more than 30% of their income on housing costs (2015 American Community Survey).

Supply

As of May 2020, there were 19,154 households on Spartanburg Housing's waiting lists. There is a significantly high unmet demand for assisted housing in Spartanburg. Current funding levels simply do not allow supply to meet the demand.

Quality

Quality affordable units that are both decent and safe are needed throughout the jurisdiction.

Accessibility

Spartanburg Housing complies with the Americans with Disabilities Act (ADA) requirements by having 5% of its housing stock meet the accessibility requirements.

Size of Units

Spartanburg Housing's Asset Management units are comprised of various sizes and types of units which include duplexes, garden style apartments, townhouses, high-rise apartments and range from efficiencies to five bedrooms.

Location

Factors that must be considered in developing housing include location, services, amenities, proximity to health care, shopping, affordability, transportation and schools.

Strategies for Addressing the Housing Needs

1. Spartanburg Housing intends to maintain the availability of decent, safe and affordable housing needs by:
 - a. One for one replacement of units repositioned due to RAD.
 - b. Leveraging private or other public funds as available to create additional affordable housing opportunities by:

- i. Continue to support and to seek partnerships and alliances with non-profit and for-profit developers
 - ii. Identify opportunities, Low-Income Housing Tax Credits (LIHTC) RAD, Project-Based Vouchers, HOME or other grants supporting rehabilitation or development
 - iii. Consider utilizing bonding capacity
 - c. Utilize Demolition or Disposition Transitional Funding (formerly Replacement Housing Factor Funds) and or development fees as available.
 - d. Review opportunities to acquire or build units or developments.
 - e. Use LIHTC program (both 4% & 9% credits) when available to rehabilitate existing, or to construct new affordable rental property. Support efforts by the City of Spartanburg and the Highland Community in the development of a Master Plan for Highland Area.
 - f. Maintain a minimum of 98% occupancy rate. Maintain vacant unit turnover time at or below 20 days.
 - g. Improve housing management monitoring and internal reporting tools. Maintain a high level of accountability, while implementing timely tracking, scheduling, and follow-up for rent collection efforts, vacancy turnover management, and new leases.
2. Review applications for additional vouchers through the NOFA process.
- a. The Housing Choice Voucher (HCV) HCV Program may issue an RFP for project based vouchers, or will utilize PBV's in accordance with RAD guidance in an effort to support the increase of affordable assisted housing within the community. HCV will review published NOFAs to determine eligibility and capacity.

The City's Consolidated Plan reflects a lack of affordable housing as a potential barrier. Spartanburg Housing entered into a MOU with the City of Spartanburg and the County of Spartanburg to address the HUD, Affirmatively Furthering Fair Housing protocol. Spartanburg Housing participates in the United Way, Financial Stability and Housing Task Force, and continues to work with community partners to identify and address issues involving affordable housing. Spartanburg Housing will seek replacement of public housing units lost in the inventory by demolition. Spartanburg Housing will market the Housing Choice Voucher (HCV) program among owners, particularly those outside of areas of minority and poverty concentration.

Homeownership

Spartanburg Housing will review requests by public housing residents occupying single family homes who wish to purchase. This option will no longer be available once the units have converted to RAD. The HCV program will continue to support homeownership utilizing the HCV vouchers.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

PHA Policies Governing Eligibility, Selection, Admissions Policy, including De-concentration and Wait List Procedures. [24 CFR Part 903.7 (b)]

The following eligibility requirements apply to applicant families seeking Asset Management and HCV assistance:

- 1. A family as defined by HUD and Spartanburg Housing :
 - a. Heads of household where at least one member of the household is either a citizen or eligible non-citizen. (24 CFR Part 5, Subpart E).

- b. Has an Annual Income at the time of admission that does not exceed the low-income limit for occupancy established by HUD and posted separately in Spartanburg Housing offices.
 - c. Provides a Social Security number for all family members, age 6 or older, or will provide written certification that they do not have Social Security numbers;
 - d. Meets or exceeds the tenant Selection and Suitability Criteria as set forth in this policy.
2. All applicants will be processed in accordance with HUD's regulations (24 CFR Part 960) and sound management practices. Applicants will be required to demonstrate ability to comply with essential provisions of the lease or program requirements.
 3. Spartanburg Housing will permanently deny admission to lifetime sex offenders and persons convicted of manufacturing or producing methamphetamine on the premises of the assisted housing project in violation of any Federal or State law. "Premises" is defined as the building or complex in which the dwelling unit is located, including common areas and grounds. Spartanburg Housing will not waive this requirement.
 4. Spartanburg Housing will make unit offers based on time and date of application, needed bedroom size, and any local preferences. Two offers are made based on unit availability. The HCV program may select applicants based on a lottery system.
 5. Spartanburg Housing purges its waiting list through letters and/or emails to applicants every year. Applicants must then login to their portal to declare their status within 30 days.
 6. Spartanburg Housing will consider mitigating circumstance when considering denial of assistance based on criminal activity.

Implementation of the following activities will assist the residents in increasing their income levels. This will potentially impact those families currently residing in communities with a concentration of poverty, as well as helping residents overcome the barriers of transportation, education and child care.

1. Spartanburg Housing is administering its Family Self-sufficiency Program as a tool for assisting residents and participants in increasing their wage earning capacity.
2. Families will continue to be connected to community partners through training, case management, referrals, counseling, and job placement.
3. Spartanburg Housing will seek other Department of Labor funded grant opportunities.
4. Spartanburg Housing will comply with HUD regulations concerning income mixing in Asset Management properties.
5. Preferences have been implemented for homeless and veterans. The preference will permit homeless veterans to receive additional points when waitlists are open. Spartanburg Housing's HCV program is currently administering a TBRA (tenant based rental assistance program) which provides rental assistance with funds from Spartanburg County, which will assist 12-15 families that are elderly, disabled or working.
6. Spartanburg Housing will seek replacement of public housing units lost in inventory through demolition. Spartanburg Housing will market the Housing Choice Voucher (HCV) program among owners, particularly those outside of areas of minority and poverty concentration.

Financial Resources **(PENDING FY2020 AUDIT):**

	FY2016	FY2017	FY2018	FY2019
Low Rent Public Housing Operating Fund	\$3,832,102	\$ 3,516,444	\$ 2,378,931	\$2,414,652
Capital Fund	\$2,849,950	\$27,818	\$369,675	\$785,143
Housing Choice Voucher	\$10,467,607	\$11,712,040	\$12,750,650	\$12,118,236
Multifamily Housing Elderly Service Coordinators	\$71,365	\$72,760	\$66,181	\$207,071
YouthBuild Program	\$599,562	\$ 450,798	\$353,560	\$55,092
Resident Opportunities and Self Sufficiency	\$251,690	\$291,797	\$135,191	\$97,223
Moderate Rehabilitation Program (Cluster)	\$1,751,371	\$1,460,679	\$1,432,091	\$129,666
Blended Component Unit	\$ -	\$ -	\$122,094	\$1,399,497
New Construction S/R Section 8 Programs (Cluster)	\$497,366	\$494,015	\$490,205	\$ -
CDBG Funds (pass-through from City of Spartanburg)	\$9,219	\$2,396	\$ -	\$487,705
HOME Funds (pass-through from City of Spartanburg)	\$677,397	\$ -	\$ -	\$57,782
Choice Neighborhood Planning Grant	\$ -	\$ -	\$ -	\$ -
Special Allocation - Vocational Funds (SC state pass-through)	\$102,977	\$114,856	\$ -	\$ -
Total Federal Grants	\$21,110,606	\$18,143,603	\$18,098,578	\$17,752,067
Dwelling Rents	\$1,741,706	\$1,681,564	\$1,701,740	\$1,590,392
Tenant revenue -other	\$152,953	\$134,385	\$158,229	\$157,744
Gain on disposition of assets	\$(4,507,325)	\$2,779,281	\$(343,778)	\$ -
Business Activities	\$ -	\$ -	\$ -	\$22,404
Other income	\$4,087,551	\$ -	\$ 1,161,791	\$676,745
TOTAL RESOURCES	\$22,585,491	\$22,738,833	\$20,776,560	\$20,199,352

Rent Determination

Rent is determined by establishing the household's total tenant payment (TTP) in accordance with 24 CFR 5.628.

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30% of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10% of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent of \$50 has been established by Spartanburg Housing.

Spartanburg Housing has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B of the ACOP.

Spartanburg Housing submitted an application for Moving to Work Cohorts based around Rent Reform.

Homeownership Programs

Spartanburg Housing has an approved Section 32 Homeownership Program with 15 remaining PHA Scattered Site homes. Existing public housing residents may purchase the homes until Spartanburg Housing has received a RAD, CHAP and approval from HUD. At that time the homes will be sold to the public at the appraised value.

Spartanburg Housing may elect to sell or offer of these homes to be rehabilitated and rented to low income families. Alternately, Spartanburg Housing may receive a grant from the Department of Mental Health which may permit rehabilitation of the homes. In this case, Spartanburg Housing will seek permission to provide these homes to persons with mental health disabilities. Additionally the agency may convert the units to Project Based Vouchers.

Public Housing Program

Spartanburg Housing will continue to seek opportunities for participants in the area of homeownership.

1. Spartanburg Housing has recently submitted a Rental Assistance Demonstration (RAD) Grant for AMP 40 which includes all of the scattered site single family homes in the Section 32 Program. If approved Spartanburg Housing plans to dispose of the majority of these homes by selling them as is to any individual, the sale would not be restricted to low-income buyers.
2. Review Lease Purchase Program to increase success in low-income families to becoming first time homeowners.

Housing Choice Voucher Program

Housing Choice Voucher (HCV) HCV Program will continue with its Homeownership Program.

This Homeownership option will be available to up to 150 participants utilizing the voucher.

HCV Program will administer Mainstream and VASH voucher as required by HUD regulations.

Utilize funds for Spartanburg County to administer the Emergency Rental Assistance Program.

Housing Choice Voucher Waitlist

Spartanburg Housing may utilize a lottery system to place applicants on the waiting list for the Housing Choice Voucher Program. The lottery system will only be used if more than 5000 applications are received.

Once the application deadline expires and the waitlist is closed, Spartanburg Housing will conduct a lottery to randomly assign a lottery number to all pre-applications in the preliminary applicant pool. The pre-applications will then be placed on the HCV waitlist in sequential order based on the assigned lottery number, and then sorted by preference(s) to determine the position on the waitlist.

Spartanburg Housing will determine the total number of families to be placed on the wait list. The total number of families on the waitlist should not exceed a reasonable estimated wait time to be selected from the waitlist. Applicants selected for placement on the waitlist will be notified. Those applications not selected for the waitlist will received a notice and must reapply when the waiting list reopens.

Spartanburg Housing continues to accept applicants on the HCV waiting list from veterans who currently live in Spartanburg County. Families who apply must meet the local residency and veteran preference. Spartanburg Housing accepts applications from families who are currently being displaced by government action.

Community Service and Self-Sufficiency Programs

Spartanburg Housing will continue to provide resident services through the utilization of HUD funds and grants to public housing communities. Spartanburg Housing partners with multiple agencies to provide workshops pertaining to job readiness, resume building, interviewing skills, educational training, etc. We will continue these collaborative efforts as the partnerships help extend supportive services to our residents and participants.

We will support Resident Councils and Resident Advisory Boards to increase their awareness and participation in community services and activities. Together with Resident Councils provide increase engagement, community awareness, and collaboration for events with community partners; such as Strong Family, Christmas, Back to School, and Thanksgiving.

Spartanburg Housing will continue to administer our Family Self-Sufficiency Program for both public housing residents and Housing Choice Voucher recipients. This program consists of supportive services to providing the following: job readiness assistance training, case management, referral services, and escrow for increased income. These activities may assist Spartanburg Housing in increasing the income levels of residents currently residing in communities and moving toward a path of self-sufficiency.

Spartanburg Housing will provide access to computer labs located within our public housing communities, to allow residents internet access to search for jobs, complete homework, or research relevant information. Spartanburg Housing will collaborate with community partners to teach classes and workshops utilizing the computer labs. Spartanburg Housing will update all computers to be more proficient for online learning with camera, headphones, and privacy screens.

In our efforts to ensure Elderly and Disabled age independent in place. Spartanburg Housing will continue to provide full time service coordinators through the Elderly and Disabled Subsidy and Multi Family Services Coordination Federal Grant. The service coordinators provide non-direct service through agency referrals, programs, and activities to allow residents to age in place with supportive services.

Spartanburg Housing will put a focus on Youth Services in the coming year with expanding our outreach to student K – 12th grade. We will remain a site for the Summer Food Service Program (SFSP).SFSP is administered at the Federal level by the Food and Nutrition Service, an agency of the United States Department of Agriculture. We will provide meals during the lunch hour through the Summer (June – August). We will coordinate educational opportunities for students in attendance to increase their learning and skills through the summer. Spartanburg Housing will collaborate with agencies such as United Way of the Piedmont and Spartanburg Academic movement to provide necessary support for graduating seniors. Spartanburg Housing will hire a Community Health Worker in collaboration to support students and families for supportive services to support the whole family needs.Spartanburg Housing will apply to become a sponsor for the Child and Adult Care Food Program (CACFP) through the Department of Social Services (DSS). The CACFP will allow Spartanburg Housing to provide a nutritious dinner and snack to children in PHA sites as well as other children in the community that are a part of an after-school program.

Spartanburg Housing created Homework Club to provide assistance to students K-8th grade. This program is being established to enrich children's learning so they can become strong, enthusiastic and independent . This program will continue with substantial volunteers.

Spartanburg Housing will apply for a AmeriCorp VISTA to provide program opportunities at each PHA site to build capacity in programming with community partners for services to families. The person will assist with our efforts of economic mobility.

Spartanburg County Foundation holds the agencies Marche Gault Scholarship program and Change of Life fund which are opportunities to provide community engagement and educational support to families. The agency will review ways to better capitalize on additional funding for the Funds.

Safety and Crime Prevention

Spartanburg Housing's public housing properties are within the City Limits of the City of Spartanburg. All of these properties are under the jurisdiction of the Spartanburg Police Department. The Spartanburg

Housing portfolio contains units in the County of Spartanburg, the jurisdiction of the Spartanburg County Sheriff. Spartanburg Housing regularly communicates with both agencies regarding community security issues. Spartanburg Housing will continue its efforts to effectively engage with Spartanburg Police Department (SPD).

1. Spartanburg Housing , through its agreement with SPD receive daily reports of calls for service and weekly reports of incidents within public housing sites or crimes committed by persons residing within public housing.
2. SPD has established a “HOTLINE” for residents to anonymously report any criminal activities. There is a "Hotspot" form that we pass out to residents to anonymously report crime.
3. The Archibald Rutledge Hi-Rise property has established a resident-staffed Reception Desk, seven days a week, during daytime hours, whereby entry into the building is monitored.
4. Spartanburg Housing maintains agreement with SPD to, provide supplemental patrols as needed, develop, and implement crime prevention strategies.
5. Spartanburg Housing will check criminal history using Yardi credit screening, for all applicants who are 18 years of age or older, to determine whether any family member has engaged in violent or drug-related criminal activity.
6. Spartanburg Housing will check criminal history for all applicants, residents, and participants who are 18 years of age or older. HUD requires denial of assistance to persons convicted as lifetime sexual offenders and for production of methamphetamines. Spartanburg Housing will consider mitigating circumstances in accordance with HUD guidance for other offenses.
7. To respond to the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking, Spartanburg Housing will comply with all HUD VAWA regulations.
8. Spartanburg Housing will seek to install additional security measures at all public housing sites.

SPD, as part of its agreement with Spartanburg Housing , provides officers as needed to testify, provides training, and assists in preparing documents for court, to ensure corrective measures are taken.

Asset Management Security Improvements:

- a. Spartanburg Housing continues to partner with community groups and Neighborhood Watch organizations.
- b. New signage was purchased for all sites in compliance with the SC Code of Laws Section 16-11-620 regarding trespassing on Spartanburg Housing property.
- c. New security camera upgrades were completed at Archibald Hi-Rise and Prince Hall Apartments. Additional cameras are being explored for the exterior of Prince Hall and interior of Camp Croft Courts and JC Bull Apartments.

VAWA

Spartanburg Housing is in compliance with the VAWA provisions.

Asset Management

Spartanburg Housing manages its AMP's in accordance with HUD's Asset Management principals.

DECONCENTRATION AND INCOME TARGETING

1. Background

Included in Quality Housing and Work Responsibility Act of 1998 (QHWRA or Housing Reform Act) is a requirement that PHA's submit, with their Agency Plans, an admissions policy designed to promote income-mixing within Asset Management complexes. The U.S. Department of Housing and Urban Development (HUD) established "income-mixing" rules and tools for evaluation of the current income-mix. The procedures are delineated, "Rule to Deconcentrate Poverty and Promote Integration in Public Housing; Final Rule", published in the Federal Register as 24 CFR Part 903 and dated 22 December 2000.

2. Deconcentration Policy

It is Spartanburg Housing's policy to provide for deconcentration of poverty and encourage income mixing with a goal of bringing higher income families into lower income complexes, and lower income families into higher income complexes. Spartanburg Housing will ensure that all marketing of our housing is targeted to all eligible income groups. Lower income residents will not be steered toward lower income complexes; higher income residents will not be steered toward higher income complexes. Instead, residents decide where they would like to live. Each applicant that reaches the top of the waiting list will be offered the first available unit. However, if they do not wish to accept this unit offer, they will be given up to two additional offers. If an applicant declines three unit offers without good cause, that applicant will be cancelled from the waiting list.

3. Income Targeting

Spartanburg Housing will follow the statutory requirement that at least 40% of newly admitted families in any fiscal year should have an annual income at or below 30% of the area median income. To ensure this requirement is met, Spartanburg Housing will monitor incomes of newly admitted families.

4. Fair Housing

In March 2017, the City of Spartanburg, Spartanburg County, and the Spartanburg Housing entered into a collaborative partnership to prepare an Assessment of Fair Housing (AFH) Study. Spartanburg County's Community and Economic Development Department has lead the effort in support of Spartanburg Housing and the City to select consultant Mosaic Community Planning, LLC to prepare the study. Over the last nine months the three partners have gathered information from stakeholders, over 250 resident surveys, and six public meetings.

The completed document, the Joint Analysis of Impediments to Fair Housing Choice is required to be submitted to the U.S. Department of Housing and Urban Development – Fair Housing Division for review.

The document is a requirement as part of the partner's efforts to receive federal funds for housing, community development, and economic development. The completed document provides the partners with six (6) impediments that should be addressed over the next 3-5 years.

1. IMPEDIMENT #1: LACK OF GEOGRAPHIC DIVERSITY IN AFFORDABLE HOUSING CHOICES
2. IMPEDIMENT #2: NEIGHBORHOODS NEED PLACE-BASED COMMUNITY INVESTMENTS
3. IMPEDIMENT #3: NEED FOR CONTINUED AND EXPANDED FAIR HOUSING ACTIVITIES
4. IMPEDIMENT #4: AFFORDABLE HOUSING PLANNING LACKS EQUITY FOCUS
5. IMPEDIMENT #5: LIMITED HOUSING OPTIONS FOR PEOPLE WITH DISABILITIES
6. IMPEDIMENT #6: WEAK JOBS-TRANSIT CONNECTION

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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
- Hope VI or Choice Neighborhoods.
 - Mixed Finance Modernization or Development.
 - Demolition and/or Disposition.
 - Designated Housing for Elderly and/or Disabled Families.
 - Conversion of Asset Management to Tenant-Based Assistance.
 - Conversion of Public Housing to Project-Based Assistance under RAD.
 - Occupancy by Over-Income Families.
 - Occupancy by Police Officers.
 - Non-Smoking Policies.
 - Project-Based Vouchers.
 - Units with Approved Vacancies for Modernization.
 - Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

Mixed Finance Modernization of Development

Spartanburg Housing has an approved Rental Assistance Demonstration Program (RAD) award for a portion of its portfolio. Spartanburg Housing intends to convert its entire remaining public housing portfolio utilizing the RAD process.

The Public Housing units will convert to Project Based Vouchers under the RAD Program. Spartanburg Housing has received a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for these properties and anticipates RAD conversion closing in 2020.

EXISTING MIXED FINANCE PROPERTIES	TOTAL UNITS	RAD PROJECT BASED VOUCHERS	RAD CONVESION STRATEGY
Country Garden Estates	50	10	Closed March 2020; Refinanced
Collins Park	100	24	Refinancing; Closing in 2021
The Ridge at Southport	78	54	Refinancing; Closing in 2021
Cottage Grove	8	8	Refinancing; Closing in 2021
Cammie Clagett Phase II	18	18	Transfer of Assistance to Northside Station; Closed May 2020
Victoria Gardens	80	80	Closed October 2020;9% LIHTC
Single Family Houses	15	15	Section 18 disposition or PBV; Early 2022
TOTAL	279	132	

Collins Park, The Ridge at Southport and Cottage Grove will convert under the RAD Program with refinancing.

Country Garden Estates will convert through refinancing. The initial 15-year Tax Credit compliance period expired and Spartanburg Housing exercised its first right of refusal to acquire the property as sole owner. A 223F loan was utilized to pay off the existing first mortgage and fund some rehabilitation work.

Cammie Clagett Phase II – Phase II of the Cammie Clagett RAD conversion consisted of a Transfer of Assistance (TOA) to another site. Spartanburg Housing partnered with the City of Spartanburg, the Northside Development Group and Spartanburg Housing Partners, a for profit developer, to transfer 18 of the remaining 78 RAD replacement units from the Cammie Clagett development to the newly constructed Northside Station.

Single Family Homes – The single-family homes will be disposed of through Section 18 disposition or converting to RAD project base vouchers. Spartanburg Housing may elect to sell the units at fair market value under an open bid process or rehabilitate the units for rental. Alternately, Spartanburg

Housing may elect to partner with South Carolina Department of Mental Health to position these units for housing for persons with disabilities.

Phase III – The final Phase of the RAD conversion includes the properties listed in the chart below. Spartanburg Housing will procure Development Partners to assist in the redevelopment of these properties. The proposed strategy for each property is summarized below.

PROPERTY	RAD CONVERSION UNITS	RAD CONVERSION STRATEGY
Archibald Rutledge	150	4% LIHTC 2021
Archibald Village	50	4% LIHTC 2022
Camp Croft Courts	96	Phased demolition and redevelopment 2022 or 2023
Cambridge Place	6	Convert “as is”
NEW MIXED INCOME PARTNERSHIP		
Prince Hall Apartments	100	Demolition and redevelopment 2022 or 2023
TOTAL	476	

Archibald Rutledge and Village– Spartanburg Housing may seek to leverage capital that may become available for Opportunity Zones. In addition, Spartanburg Housing will submit a 4% LIHTC application in 2022 SH may also explore the possibility of demolition and new construction for these sites.

Victoria Gardens – Spartanburg Housing was awarded a 9% LIHTC in October 2019 and the project closed in October 2020. The RAD conversion strategy for Victoria Gardens is substantial rehabilitation to all 80 units. The rehab will be done in five phases to minimize off-site relocation.

Camp Croft Courts and Prince Hall – Plans are being reviewed to determine the best possible options for these sites.

Non-smoking Policies

Smoking is prohibited in the common areas and the dwelling units at all Spartanburg Housing public housing properties as of July 30, 2018. Designated Smoking Areas were implemented at the Archibald Hi-Rise and Village, 25 feet away from all entrances.

US Department of Housing and Urban Development 24CFR part 965 “Instituting Smoke Free Public Housing”. Spartanburg Housing requires all residents to comply with no smoking in any public housing and sign the board approved Smoke Free Policy.

Project-Based Vouchers

As part of the redevelopment strategy and to improve the overall quality of the housing stock offered to the residents of Spartanburg County, Spartanburg Housing may project base up to 25% of its baseline voucher allocation. Preference for Project Based Vouchers will be combined with RAD vouchers for Transfer of Assistance conversion identified above.

The Transfer of Assistance to Project Based Vouchers will be assigned to the following properties:

- Country Gardens Estate
- Collins Park
- The Ridge at Southport
- Cottage Grove
- Cammie Clagett Courts

Other Spartanburg Housing approved properties

RAD RESIDENT PROTECTION

Upon conversion to Project Based Vouchers, Spartanburg Housing will adopt the RAD resident rights, participation, waiting list and grievance procedures as described below. Additionally, Spartanburg Housing 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 Spartanburg Housing with access to private sources of capital to repair and preserve its affordable housing assets.

Spartanburg Housing certifies that all RAD locations, including new locations selected for transfer of assistance shall meet all Site and Neighborhood requirements and shall comply with the following requirements.

- Site selection requirements set forth at 24 CFR 983.57;
- The Fair Housing Act;
- Title VI of the Civil Rights Act of 1964 including implementing regulations at 24 CFR 1.4(b)(3);
- Section 504 of the Rehabilitation Act of 1973 including implementing regulations at 24 CFR 8.4(b)(5); and
- The Americans with Disabilities Act.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), Spartanburg Housing is redefining the definition of a substantial deviation from the PHA Plan to reflect exclusion of 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.

Resident Rights and Participation

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 greatest of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 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.

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 recertification's – Full standard TTP

Please Note: 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)* 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. Spartanburg Housing will comply with all notices and regulatory advises pertaining to RAD and HCV.

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.

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 HCV 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.

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) provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's HCV 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.

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 Asset Management 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 Asset Management 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 waitlist 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 Asset Management 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 Asset Management waiting list.

Any activities to contact applicants on the Asset Management waiting list must be conducted 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 Asset Management 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 Asset Management Conversions.* For the initial Calendar Year in which a

project's assistance has been converted, RAD PBV projects will be funded with Asset Management money. Since the Asset Management funding will not have been transferred to the TBRA account and since this funding is not HCV 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 Asset Management funding for the PBV units during this transition period, PHAs will not receive ongoing HCV 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 "HCV(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 HCV ongoing administrative fees for PBV RAD units.

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

Other Capital Grant Programs

Currently Spartanburg Housing does not have any funded Capital Fund Community Facilities Grants or Emergency Safety and Security Grants. However, Spartanburg Housing reserves the right to submit these.

Spartanburg Housing has committed \$541,000 of RHF funds to Northside Station as a financial tool for closing a gap in the 18 RAD units to be constructed at Northside Station. An additional \$200,000 has been committed to the Northside Station funded from the sale of Cammie Clagett. Funding may be adjusted depending on board approval. Spartanburg Housing may seek to develop one or more units of affordable housing in the City of Spartanburg area through the Capital Fund Program. In addition, Spartanburg Housing will utilize the Capital Fund program for RAD purposes, including expenses for RAD Physical Condition Assessments for properties where Spartanburg Housing has been issued Commitment of Housing Assistance Payments (CHAPs). Fees and services associated with RAD, payment of RAD consultant fees, and in supporting financial gaps in the portfolio transition. Spartanburg Housing will make minor improvements and upgrades at all of the public housing properties using the Capital Fund Program. The improvements are new toilets, water heaters, PTAC units, facuets, electrical panel upgrades, appliances, and HVAC units. The Capital Fund Program will also be used to help rehabilitate the single family homes.

Spartanburg Housing has an approved Rental Assistance Demonstration Program (RAD) award for a portion of its portfolio. The conversion of all Asset Management Properties to Project Based Vouchers is being completed in three phases.

Phase I

The first Phase of RAD consists of 8 properties with a total of 410 units. The RAD conversion transaction for Phase I closed in 2016.

Phase II

The second Phase of RAD consists of the 8 properties below. These properties are existing mixed finance communities that were developed under Spartanburg Housing 's former HOPE VI program(s). The total units in each property include both Public Housing and Non-Public Housing units.

The Public Housing units will convert to Project Based Vouchers under the RAD Program. Spartanburg Housing has received a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for these properties and anticipates a RAD conversion closings in 2019, 2020, and 2021.

EXISTING MIXED FINANCE PROPERTIES	TOTAL UNITS	RAD PROJECT BASED VOUCHERS	RAD CONVESION STRATEGY
Cedar Springs Place	44	19	Convert "as is" and Transfer of Assistance to Parkside at Drayton in 2019
Country Garden Estates	50	10	Refinanced; Closed in March 2020
Collins Park	100	24	Refinancing; Closing in 2021
The Ridge at Southport	78	54	Refinancing; Closing in 2021
Cottage Grove	8	8	Refinancing; Closing in 2021
Cammie Clagett Phase II	18	18	Transfer of Assistance to Northside Station; Closed in May 2020
Victoria Gardens	80	80	9% LIHTC; Closed in October 2020
Single Family Houses	15	15	Section 18 or PBV: Early 2021
TOTAL	393	228	

Cedar Springs Place—A transfer of assistance of 19 units was provided for a 4% tax credit property known as Parkside at Drayton.

Spartanburg Housing will seek to develop through sale or development financial partnerships for the 130 acres of property at Page Lake.

Spartanburg Housing will seek potential partnerships through Opportunity Zones and the SC Housing Finance and Development Authority Small Rental Development Program for development of land owned by the Agency.

Spartanburg Housing will issue Multifamily housing revenue bonds with the goal of overcoming the shortage of decent, safe, and sanitary housing that can be afforded by persons of low and moderate income.

B. 3 Civil Rights Certification.

Form HUD-50077-CRT-SM, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B. 4 Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

Report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan

B.
5

Progress Report.

1. HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

1. Leverage:

2. Acquire or build

Spartanburg Housing may acquire new properties or build new units at Collins Park, Camp Croft, or other vacant land owned by the agency as it repositions its portfolio to RAD.

3. Improve the quality of assisted housing

Spartanburg Housing contributed to an improved quality of life for our residents by purchasing appliances to include, ranges, refrigerators, PTAC units, and water heaters. Additionally, Spartanburg Housing has completed roof replacements at Camp Croft Courts and Prince Hall. Gas line replacements were completed at Camp Croft Courts and Victoria Gardens Apartments. Kitchen cabinets and fixtures were replaced at Camp Croft Courts. Spartanburg Housing will participate in the Duke Energy Multi-Family Energy Efficiency Program at all of its AMPS.

4. Voucher Management (SEMAP Scores)

Spartanburg Housing shall continue to maintain sufficient points for a High Performing Designation in the Housing Choice Voucher (HCV) Section 8 HCV Management Assessment Program (SEMAP) through monthly monitoring and increased staff training. Spartanburg Housing will continue to administer the HCV program in a manner that results in points necessary for designation as a High Performer.

5. Customer Service

Spartanburg Housing will provide excellent customer service by continued staff development and training.

6. Outreach to landlords and homeownership programs

Spartanburg Housing has operated a voucher homeownership program now for a number of years. Since the beginning of our program, we have helped more than 3 families purchase homes through the voucher program.

Spartanburg Housing will conduct owner outreach to ensure that owners are familiar with the program and its advantages. Spartanburg Housing will actively recruit property owners with property located outside areas of poverty and minority concentration and develop a working relationship with the Real Estate Brokers Association.

Spartanburg Housing has a HUD approved Section 32 Homeownership Plan and intends to employ strategies which support the sale of the homes. Spartanburg Housing will continue to develop homeownership opportunities. Spartanburg Housing will seek to amend the approved Section 32 plan.

Spartanburg Housing has held owner interest meetings and participates in the United Way Housing Task Force. SHA staff attends the local Realtors Association meetings.

7. Asset Management :

- a. All of our Public Housing sites have site-based waiting lists.

- b. In November of 2016, Spartanburg Housing launched an electronic application portal allowing applicants the opportunity to apply on-line.
- c. Spartanburg Housing also launched an electronic payment system, WIPS via the Yardi system of record. All payments accepted must now be done via WIPS or Auto draft.
- d. The maintenance staff is managing work orders via smart phones. This technology has increased response time and efficiency.
- e. Beginning in CY2019 residents utilize the resident portal to turn in documentation needed for their recertifications. Spartanburg Housing will make accommodations for those residents unable to comfortably access this portal.

2. HUD Strategic Goal: Improve community quality of life and economic vitality

1. Spartanburg Housing is administering its Family Self-Sufficiency Program. We seek to increase the wage earning capacity of low income families within targeted communities and promote self-sufficiency.
2. Spartanburg Housing will hire a community health worker to coordinate services, programs, and engagements for middle school and high school student. The long term goal would be to provide career training, build trust, connecting referrals to qualified agency, and exposing youth to more opportunities to increase their life and economic mobility. The long term goal would be to decrease 2nd generation poverty.
3. Spartanburg Housing provide homework club at its public housing sites to provide educational space for children after school. The program is for all students K – 12th. Spartanburg Housing has a partnership multiple agencies to provide educational opportunities and health checks: Don't Forget About Me, Regenes Health Care, and Humana.
4. Spartanburg Housing will continue to partner with agencies with employment focus such as SC Works, Upstate Fatherhood Coalition, City of Spartanburg, and SNAP to work
5. Resident Services staff will continue to collaborate with community partners to increase the income levels of families currently residing in communities with a concentration of poverty. As well as working with agencies to help residents overcome the barriers of transportation, education, and child care.
6. Asset Management security improvements:
Spartanburg Housing continues its collaboration with the Spartanburg Police Department to provide patrol services to designated Spartanburg Housing communities. Spartanburg Housing continues to partner with community groups and Neighborhood Watch organizations.
7. Designate developments or buildings
Spartanburg Housing continues to provide housing to Seniors at JC Bull Apartments and Pake Lake Manor.

3. HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

1. Spartanburg Housing will continue to promote self-sufficiency and asset development. Our Housing Choice Voucher (HCV) HCV and Public Housing FSS Programs will continue to be offered. Non-Public Housing FSS families are able to participate in employment readiness and educational opportunities and through the Connections Program, as grant funding permits.
2. The FSS program will continue to leverage community resources which support resident activities in the areas of education, health and job readiness. In addition, we will seek to apply for other grant programs that will assist our residents in becoming self-sufficient.

3. Spartanburg Housing has computer labs based in all Public Housing neighborhoods. The computer labs allow residents to complete school applications, search for employment, have access to the internet, and help children with homework when school is closed due to weather.

4. HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

Spartanburg Housing will adhere to all Fair Housing required regulations in its operations.

Spartanburg Housing will provide annual Fair Housing training to all staff members.

5. Other PHA Goals and Objectives: (list below)

1. Spartanburg Housing will seek to administer additional Department of Labor grants.
2. Spartanburg Housing will seek to leverage funds from the City of Spartanburg’s NIP funds for the demolition of dilapidated housing in our inventory.
3. Spartanburg Housing will conduct market studies in association with RAD transitions.
4. Spartanburg Housing will provide information to the community through the RAD Community Committee meetings.
5. Spartanburg Housing may consider training some of its existing staff as the properties transition and both funding and opportunity are available.
6. Spartanburg Housing will temporarily relocate residents impacted by RAD during construction or demolition.
7. Spartanburg Housing may reposition or reduce staff as a result of RAD transitions.
8. Spartanburg Housing relocated the Central Office Cost Center (COCC) in December 2020.
9. Spartanburg Housing will seek to apply for Moving to Work opportunities as they relate to rent reform of the HCV and public housing programs.
10. Both HCV and public housing will strive to be High Performing on SEMAP and PHAS.

**B.
6**

Resident Advisory Board (RAB) Comments.

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N

(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

**B.
7**

Certification by State or Local Officials.

Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.8	<p>Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing Asset Management and receive funding from the Capital Fund Program (CFP).</p>

C.1	<p>Capital Improvements.</p>
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B.3 Civil Rights Certification. Form HUD-50077-CRT-SM, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.4 Most Recent Fiscal Year Audit.

B.6 Resident Advisory Board (RAB) Comments.

B.7 Certification by State or Local Officials. Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing Asset Management and receive funding from the Capital Fund Program (CFP). Attached please find a copy of Spartanburg Housing 's most recently HUD-approved 5-Year Action Plan (HUD-50075.2) which was approved by HUD on August 16, 2017 (copy of HUD letter attached) and by Spartanburg Housing's Board of Commissioners on June 26, 2017 . Copies of the Board Resolutions are also attached. Attached is a copy of the most recent HUD approved Capital Fund Budget.

With this Annual and 5-Year Plan submittal Spartanburg Housing is also submitting a new Capital Fund Program - Five- Year Action Plan form HUD-50075.2 for the years 2019 - 2023 for approval by HUD. Please find attached a copy of this Plan.