

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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, including changes to these policies, 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. The 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 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, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 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 exceed 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: The Housing Authority of the City of Spartanburg dba Spartanburg Housing PHA Code: SC003 PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>527-316</u> Number of Housing Choice Vouchers (HCVs) <u>2,918-2,650</u> Total Combined Units/Vouchers <u>3,445/066</u> 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 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; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">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> <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. Plan Elements

B.1 Revision of Existing 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.
 - Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

(c) The PHA must submit its Deconcentration Policy for Field Office review.

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 3,445 families under its various housing programs (See Table 1 below):

Table 1

Housing Programs	Units	Vouchers
Public Housing	527416	
Housing Choice Voucher (HCV) HCV-(Voucher Program)		2,3782,0001.700
Homeownership Voucher		27
Project Based Voucher		273
Mainstream		150
Affordable/Moderate Income	345117	
RAD - PBV		385495
RAD - PBRA	80	
VASH		5
Total	953613	2,8181,650

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	
Public Housing	2,9575,482
HCV	6635,604
Project Based	44741
Affordable/Moderate Income	75
RAD	3,3943,941

VASH	0
Total	6,227,158.43

The 2021 Median Income for the Spartanburg, SC MSA is \$68,800. Income Limits are based on the family size or number of persons in the family. Currently, 48.5 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 \$21,960. In the Asset Management programs, 80 percent fall below this limit. The Housing Choice Voucher (HCV) participants are at 77% AMI. In addition, both programs serve the following elderly/disabled populations: HCV- elderly 25.26% and 43.34% disabled; Asset Management – elderly 25% and 31% disabled.

Households of various races and ethnic groups of families on our waiting lists for Asset Management account as 33.33% White, 56.25% Black, .41% Asian, 1.25% American Indian and 4.58% Hispanic and 4.18% other. Housing Choice Voucher (HCV) Program waiting lists total as 9.60% White, 76.89% Black, 7.84% Hispanic and other 5.67%.

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 5,000 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 receive 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.

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 March 2022-2023, there were 6,227,664 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) 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 HCV program among owners, particularly those outside of areas of minority and poverty concentration.

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 PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

1. Spartanburg Housing will determine the average income of all families in all covered developments on an annual basis.
2. Spartanburg Housing will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.
3. For developments outside the EIR Spartanburg Housing will take the following actions to provide for deconcentration of poverty and income mixing:
 - a. Spartanburg Housing will review the waiting list and offers to determine if marketing additional marketing of other properties will allow for transfers.

Order of Selection [24 CFR 960.206(e)]

Families will be selected from the waiting list based on date and time of receipt of application, size of unit required, and preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by Spartanburg Housing.

When selecting applicants from the waiting list, Spartanburg Housing will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. Spartanburg Housing will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing, and income targeting will also be considered in accordance with HUD requirements and Spartanburg Housing policy.

Notification of Selection

1. Spartanburg Housing will notify the family electronically or by first class mail when it is selected from the waiting list.
2. The notice will inform the family of the following:
 - a. Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview
 - b. Who is required to attend the interview
 - c. Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation
 - d. Documents that must be provided at the interview to document eligibility for a preference, if applicable
 - e. Other documents and information that should be brought to the interview
3. If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore, no informal hearing will be offered.
4. If a notification letter is returned to the PHA with a forwarding address, the letter will be changed to reflect the new period of time to respond and will be mailed to the new address indicated.

Application Interview

1. Families selected from the waiting list are required to participate in an eligibility interview.
2. The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to Spartanburg Housing.
3. The interview will be conducted only if the head of household or spouse/cohead provides appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.
4. Pending disclosure and documentation of social security numbers, Spartanburg Housing will allow the family to retain its place on the waiting list for **10 business days**. If not, all household members have disclosed their SSNs at the next time a unit becomes available, Spartanburg Housing will offer a unit to the next eligible applicant family on the waiting list.
5. If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, Spartanburg Housing will proceed with the interview. If Spartanburg Housing determines the family is not eligible for the preference, the interview will not proceed, and the family will be placed back on the waiting list according to the date and time of their application.
6. The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, Spartanburg Housing will provide the family with a written list of items that must be submitted.
7. Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).
8. An advocate, interpreter, or other assistant may assist the family with the application and the interview process.
9. Interviews will be conducted in English. For limited English proficient (LEP) applicants, Spartanburg Housing will provide translation services in accordance with Spartanburg Housing's LEP plan.
10. If the family is unable to attend a scheduled interview, the family should contact Spartanburg Housing in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, Spartanburg Housing will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without Spartanburg Housing approval will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested, and their application will be made inactive. Such failure to act on the part of the applicant prevents Spartanburg Housing from making an eligibility determination, therefore Spartanburg Housing will not offer an informal hearing.

Final Eligibility Determination (24 CFR 960.208)

Spartanburg Housing will notify a family in writing of their eligibility within 10 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

Spartanburg Housing will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program as a result of an emergency transfer from another Spartanburg Housing program.

If Spartanburg Housing determines that the family is ineligible, Spartanburg Housing will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing (see Chapter 14).

Units Designated for Elderly or Disabled Families [24 CFR 945]

Spartanburg Housing have designated elderly or designated disabled housing at the following properties: one (1) unit at Cambridge Place

Income Targeting Requirement [24 CFR 960.202(b)]

Spartanburg Housing will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

Local Preferences [24 CFR 960.206]

Spartanburg Housing will use the following local preferences: (With the exception of the waiting list for Cambridge Place and Page Lake Manor):

1. **Displaced:** Applicants who have been involuntarily displaced due to a natural disaster that has caused their current living facility to be uninhabitable. OR Spartanburg Housing action causing displacement in which the unit currently occupied is being demolished, renovated, or otherwise disposed of for homeownership purposes. Spartanburg Housing shall adhere to Federal and State laws governing displacement of residents in these cases.
2. **Homeless:** Applicants are considered homeless under the HUD definition and if documentation is provided that the family has been residing in a temporary shelter for at least 30 days.
3. **Disaster:** Federal, State, or local government action related to code enforcement, public improvement or development.
4. **Veterans:** Past or present members of the US Armed Forces, veterans, or surviving spouses of veterans who served in the active military. A copy of the service member's DD 214 Report of Separation.

Working families: In order to bring higher income families into public housing, the PHA will establish a preference for "working" families, where the head, spouse, cohead, or sole member is employed at least 20 hours per week. **VAWA:** Spartanburg Housing will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who has either been referred by a partnering service agency or

consortia or who is seeking an emergency transfer under VAWA from Spartanburg Housing's housing choice voucher program or other covered housing program operated by the Spartanburg Housing.

Spartanburg Housing will work with the following partnering service agencies:

Safe Home Rape Crisis

The applicant must certify that the abuser will not reside with the applicant unless Spartanburg Housing gives prior written approval. Local preferences will be aggregated using a system in which each preference will receive an allocation of points. The more preference points an applicant has, the higher the applicant's place on the waiting list.

The preference for victims of domestic violence, dating violence, sexual assault, or stalking seeking an emergency transfer will be equal to two (2) points.

The preference for displaced families will be equal to three (3) points.

Applicants qualifying for both preferences will thus be assigned a total of five (5) points.

All other preferences will be equal to one (1) point.

Among applicants who qualify for two preferences, date and time of application will be used to determine placement on the waiting list.

Cambridge Place shall have six weighted preferences:

- a. Working Preference: The Head, Spouse, Co-head or sole member is employed at least 30 hours per week. Families where the head, spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference.
- b. Credit Worthiness: The Head and/or Spouse must be credit worthy, credit score of 600 or higher.
- c. 80/60 AMI Income Rule: The Head and/or Spouse must meet the 80/60 AMI income rule.
- d. FSS: The Head and/or Spouse must have been or is currently an FSS participant.
- e. Homeownership Institute: The Head and/or Spouse must have been or is currently a Homeowner Institute participant or completed the program.
- f. Target Area: The Head and/or Spouse must demonstrate they have resided in the Northside target area to qualify for this preference.

The Preferences for Cambridge Place shall be weighted according to the table below:

			maximum available points
Working for Head of Household			28
	Two years or more full time	28	
	Less than two years full time	14	
	Less than one-year full time	7	
Income for Head of Household			24
	80% AMI	24	
	60% AMI	18	
	50% AMI	12	
	40% AMI	6	
FSS			18
	Three years or more	18	
	Two to Three years	9	
	One to two years	6	
	Less than one year	3	
Credit			14
	650 or above	14	
	550 to 649	7	
	450 to 549	3	
Homeownership Institute			8
Target Area			8
			100
			Total

Page Lake Manor shall have only one (1) preference:

- a. The Head and/or Spouse who are above 62 years of age, elderly only shall be considered as a preference.

For units with accessibility features, an applicant or resident requiring a unit with those accessibility features shall be considered over other applicants or resident transfers.

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 childcare.

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:

Federal Funds	Audited FY 2021
Low Rent Public Housing Operating Fund	\$2,088,945
Capital Fund	\$2,191,763
Housing Choice Voucher	\$14,157,130
Mainstream Voucher Program	\$630,690
Emergency Rental Assistance Program (ERAP)	\$359,360
Tenant Based Rental Assistance (TBRA)	\$95,296
Coronavirus Aid, Relief and Economic Security (CARES) Act	\$1,121,913
Multifamily Housing Elderly Service Coordinators	\$78,628
Resident Opportunities and Self Sufficiency	\$72,076
Spartanburg Regional Foundation	\$20,858
Total Federal Grants	\$20,816,650
Tenant Revenue	\$2,553,192
Other Government Grants	\$371,066
Other Revenue	\$4,091,450
TOTAL RESOURCES	\$27,832,367

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<u>Federal Funds</u>	<u>Unaudited FY2022</u>
<u>Low Rent Public Housing Operating Fund</u>	<u>\$2,177,425</u>
<u>Capital Fund</u>	<u>\$937,808</u>
<u>Housing Choice Voucher</u>	<u>\$14,807,527</u>
<u>Mainstream Voucher Program</u>	<u>\$1,029,164</u>
<u>Tenant Based Rental Assistance (TBRA)</u>	<u>\$121,045</u>
<u>Multifamily Housing Elderly Service Coordinators</u>	<u>\$72,610</u>
<u>Resident Opportunities and Self Sufficiency</u>	<u>\$108,165</u>
<u>Total Federal Grants</u>	<u>\$19,253,744</u>
<u>Dwelling Rents</u>	<u>\$2,727,984</u>
<u>New Construction S/R Section 8 Programs (JC Bull 100 Units)</u>	<u>\$571,462</u>
<u>Business Activities</u>	<u>\$2,251,880</u>
<u>Emergency Rental Assistance Program (ERAP)</u>	<u>\$979,287</u>
<u>Other Government Grants</u>	<u>\$907,320</u>
<u>TOTAL RESOURCES</u>	<u>\$26,691,677</u>

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.

Operation and Management

Inspections

The lease requires Spartanburg Housing and the family to inspect the dwelling unit prior to occupancy in order to determine the condition of the unit and equipment in the unit. A copy of the initial inspection, signed Spartanburg Housing and the tenant, is provided to the tenant and retained in the resident file.

If the resident is present during the move out inspection, the resident shall receive a copy of the inspection form, noting any areas of resident damage.

When applicable, Spartanburg Housing will provide the tenant with a statement of charges to be made for maintenance and damage beyond normal wear and tear, within 30 days of conducting the move-out inspection.

Spartanburg Housing and/or a third-party vendor will inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS).

Supervisory quality control inspections will be conducted in accordance with the Spartanburg Housing's maintenance plan.

Spartanburg Housing staff may conduct a special inspection for any of the following reasons:

1. Housekeeping
2. Unit condition
3. Suspected lease violation
4. Preventive maintenance
5. Routine maintenance
6. There is reasonable cause to believe an emergency exists

Building exteriors, grounds, common areas and systems will be inspected according to Spartanburg Housing's maintenance plan.

Emergency Repairs [24 CFR 966.4(h)]

When conditions in the unit are hazardous to life, health, or safety, Spartanburg Housing will make repairs or otherwise abate the situation within 24 hours.

Defects hazardous to life, health or safety include, but are not limited to, the following:

1. Any condition that jeopardizes the security of the unit
2. Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling
3. Natural or LP gas or fuel oil leaks
4. Any electrical problem or condition that could result in shock or fire
5. Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit
6. Utilities not in service, including no running hot water
7. Conditions that present the imminent possibility of injury
8. Obstacles that prevent safe entrance or exit from the unit
9. Absence of a functioning toilet in the unit
10. Inoperable smoke detectors

Non-emergency Repairs

Spartanburg Housing will correct non-life-threatening health and safety defects within 15 business days of the inspection date. If Spartanburg Housing is unable to make repairs within that period due to circumstances beyond Spartanburg Housing's control (e.g. required parts or services are not available, weather conditions, etc.) Spartanburg Housing will notify the family of an estimated date of completion. Urgent defects shall be repaired within 48 hours of notification.

The family must allow Spartanburg Housing access to the unit to make repairs.

Resident-Caused Damages

Damages to the unit beyond wear and tear will be billed to the tenant in accordance with the policies in 8-I.F., Maintenance and Damage Charges. Repeated or excessive damages to the unit beyond normal wear and tear will be considered a serious or repeated violation of the lease.

Housekeeping

Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, Spartanburg Housing will provide proper notice of a lease violation.

A reinspection will be conducted within 7 business days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a reinspection is considered a violation of the lease and may result in termination of tenancy in accordance with Chapter 13.

Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in lease termination.

Grievance Procedures

SPARTANBURG HOUSING GRIEVANCE PROCEDURE

I. Definitions applicable to the grievance procedure [24 CFR 966.53]

- A. Grievance: Any dispute a tenant may have with respect to Spartanburg Housing action or failure to act in accordance with the individual tenant's lease or PHA regulations that adversely affects the individual tenant's rights, duties, welfare, or status.
- B. Complainant: Any tenant (as defined below) whose grievance is presented to Spartanburg Housing or at the project management office in accordance with the requirements presented in this procedure.
- C. Elements of due process: An eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:
 - i. Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
 - ii. Right of the tenant to be represented by counsel
 - iii. Opportunity for the tenant to refute the evidence presented by Spartanburg Housing, including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense that the tenant may have
 - iv. A decision on the merits of the case
- D. Hearing officer: An impartial person or persons selected by Spartanburg Housing other than the person who made or approved the decision under review, or a subordinate of that person. Such individuals do not need legal training.
- E. Tenant: The adult person (or persons other than a live-in aide) who resides in the unit and who executed the lease with Spartanburg Housing as lessee of the dwelling unit, or if no such person now resides in the unit, who resides in the unit and who is the remaining head of the household of the tenant family residing in the dwelling unit.
- F. Resident organization: An organization of residents, which also may include a resident management corporation.

II. Applicability of this grievance procedure [24 CFR 966.51]

In accordance with the applicable federal regulations (24 CFR 966.50), this grievance procedure is applicable to all individual grievances (as defined in Section I above) between the tenant and Spartanburg Housing with the following exception of disputes between tenants not involving Spartanburg Housing or class grievances. The grievance procedure is not intended as a forum for initiating or negotiating policy changes between a group or groups of tenants and Spartanburg Housing's Board of Commissioners [24 CFR 966.51(b)].

This grievance procedure is incorporated by reference in all tenant dwelling leases and will be furnished to each tenant and all resident organizations [24 CFR 966.52 (b) and (d)].

Any changes proposed in this grievance procedure must provide for at least 30 days' notice to tenants and resident organizations, setting forth the proposed changes and providing an opportunity to present written comments. Comments will be considered by Spartanburg Housing before any revisions are made to the grievance procedure [24 CFR 966.52(c)].

III. Informal settlement of a grievance [24 CFR 966.54]

Any grievance must be personally presented, either orally or in writing (including email), to Spartanburg Housing's central office or the management office of the development in which the complainant resides **within 10 days after the grievable event**.

Grievances related to complaints about operations matters that are received by Spartanburg Housing's central office will be referred to the person responsible for the management of the development in which the complainant resides. Grievances involving complaints related to discrimination, harassment, or disability rights will be referred to the Civil Rights Administrator or Director of Operations.

As soon as the grievance is received, it will be reviewed by the management office of the development or the Civil Rights Administrator (if applicable) to be certain that neither of the exclusions in paragraphs II.A or II.B above applies to the grievance. Should one of the exclusions apply, the complainant will be notified in writing that the matter raised is not subject to Spartanburg Housing's grievance procedure with the reason specified.

If neither of the exclusions cited above apply, the complainant will be contacted to arrange a mutually convenient time **within 10 business days** to meet so the grievance may be discussed informally and settled without a hearing. At the informal settlement, the complainant will present the grievance and the person in charge of the management office, or the Civil Rights Administrator will attempt to settle the grievance to the satisfaction of both parties.

Within five business days following the informal discussion, Spartanburg Housing will prepare and either hand deliver, mail, or email to the tenant a summary of the discussion that must specify the names of the participants, the dates of meeting, the nature of the proposed disposition of the complaint, and the specific reasons therefore, and will specify the procedures by which a formal hearing under this procedure may be obtained if the complainant is not satisfied. A copy of this summary will also be placed in the tenant's file.

Formal grievance hearing

If the complainant is not satisfied with the settlement arrived at in the informal settlement, the complainant must submit a written request for a hearing to the management office of the development where the tenant resides **no later than five business days after the summary of the informal hearing is received**.

The written request must specify:

- The reasons for the grievance; and
- The action of relief sought from Spartanburg Housing

Within 10 days of receiving the written request for a hearing, the hearing officer will schedule and sent written notice of hearing to both the complainant and Spartanburg Housing.

IV. Selecting the hearing officer

A grievance hearing will be conducted by a single impartial person appointed by Spartanburg Housing as described below:

- A. The hearing officer will be appointed directly by the executive director.
- B. The hearing officer will be a staff member who did not make or approve the decision under review and who is not a subordinate of such persons. If the designated staff member (such as the program manager) was involved in the decision or is a subordinate of such person, an alternate hearing officer will be selected.
- C. Spartanburg Housing may select designated staff members who were not involved in the decision under review in certain circumstances, such as those involving discrimination claims or denials of requests for reasonable accommodations.
- D. Spartanburg Housing's method for selecting a hearing officer will be inserted into the lease.

V. Scheduling hearings [24 CFR 966.56(a)]

When a complainant submits a timely request for a grievance hearing, Spartanburg Housing will immediately appoint an impartial hearing officer to schedule the hearing within the following 10 business days.

Once the hearing officer has scheduled the hearing, the hearing officer will send written notice of the hearing to both the complainant and Spartanburg Housing. Notice to the complainant will be in writing, either personally delivered to the complainant, or sent by mail or email, return receipt requested.

The written notice will specify the time, place, and procedures governing the hearing. If the hearing will be held remotely, Spartanburg Housing will also include information on the remote hearing process.

The tenant may request to reschedule a hearing on a one-time basis. Should the complainant need to reschedule a second time, he or she may do so for good cause, or if needed as a reasonable accommodation for a person with disabilities. *Good cause* is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date.

VI. Procedures governing the hearing [24 CFR 966.56]

The hearing will be held before a hearing officer as described above in Section V. The complainant will be afforded a fair hearing, which will include:

- A. The opportunity to examine before the hearing any Spartanburg Housing documents, including records and regulations, that are directly relevant to the hearing.
- B. The right to be represented by counsel or other person chosen as the tenant's representative and to have such person make statements on the tenant's behalf.
- C. The right to a private hearing unless the complainant requests a public hearing.
- D. The right to present evidence and arguments in support of the tenant's complaint, to refute evidence relied on by Spartanburg Housing or project management, and to confront and cross-examine all witnesses upon whose testimony or information Spartanburg Housing or project management relies.
- E. A decision based solely and exclusively upon the fact presented at the hearing [24 CFR 966.56(b)].

The hearing is conducted informally by the hearing officer. Spartanburg Housing and the tenant must be given the opportunity to present oral or documentary evidence pertinent to the facts and issues raised by the complaint, and to question any witnesses.

The complainant or Spartanburg Housing may arrange in advance for a transcript of the hearing at the expense of the party making the arrangement. Any interested party may purchase a copy of the transcript [24 CFR 966.56(e)].

Spartanburg Housing must provide reasonable accommodation for persons with disabilities to participated in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants. If the tenant is visually impaired, any notice to the tenant that is required under this procedure must be in an accessible format [24 CFR 966.56(f)].

Spartanburg Housing must comply with HUD's requirements regarding limited English proficiency as specified in "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons," issued January 22, 2007, and available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq.

VII. Remote Hearings

Spartanburg Housing has the authority to require that hearings be conducted remotely in certain situations.

VIII. Failure to appear at the hearing

If the complainant or Spartanburg Housing fails to appear at the hearing, the hearing officer may make a determination to postpone the hearing or make a determination that the complainant has waived his or her right to a hearing.

Both the complainant and Spartanburg Housing must be notified of the determination by the hearing officer. A determination that the complainant has waived his or her right to a hearing will not constitute a waiver of any right the complainant may have to contest Spartanburg Housing's disposition of the grievance in an appropriate judicial setting [24 CFR 966.56(c)].

IX. Decision of the hearing officer [24 CFR 966.57]

The hearing officer will prepare a written decision together with the reasons for the decision **within 10 business days** after the hearing. A copy of the decision will be sent to the complainant and Spartanburg Housing.

Spartanburg Housing will retain a copy of the decision in the tenant's file.

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date before reaching a decision. If the family misses a deadline ordered by the hearing officer, the hearing officer will make a decision based on the evidence presented.

The decision of the hearing officer will be binding on Spartanburg Housing unless Spartanburg Housing's Board of Commissioners determines within a reasonable time and notifies the complainant of its determination that:

- A. The grievance does not concern Spartanburg Housing action or failure to act in accordance with or involving the complainant's lease or PHA regulations, which adversely affect the complainant's rights, duties, welfare, or status; or
- B. The decision of the hearing officer is contrary to applicable federal, state, or local law, HUD regulations, or requirements of the annual contributions contract (ACC) between HUD and Spartanburg Housing.
- C.

When Spartanburg Housing considers the decision of the hearing officer to be invalid due to either of the reasons stated above, it will present the matter to Spartanburg Housing Board of Commissioners within 10 business days of the date of the hearing officer's decision. The Board has 30 calendar days to consider the decision. If the Board decides to reverse the hearing officer's decision, it must notify the complainant within 10 business days of this decision.

A decision by the hearing officer or Board of Commissioners in favor of Spartanburg Housing or which denies the relief requested by the complainant in whole or in part will not constitute a waiver of nor affect in any way the rights of the complainant to a trial or judicial review in any court proceedings, which may be brought in the matter later [24 CFR 966.57].

Homeownership Programs

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.

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 convert to a non-Section 9 (public housing) Program.

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 CHAP and approval from HUD.

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.

Housing Choice Voucher Program

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

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

Spartanburg Housing will seek to collaborate with other community organizations to increase participation in the Homeownership Program.

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 will continue to search for grant opportunities that all allow us to meet the needs of resident we service. Spartanburg Housing

will collaborate with community agencies providing access to food, workshops related to job readiness, resume building, interviewing skills, educational training, programs for elderly, and other event opportunities. Resident Services will continue these collaborative efforts as the partnerships helps extend supportive services to our residents and participants. Spartanburg Housing will continue to collaborate with local college/universities for volunteers and programming.

We will continue to support Resident Councils and Resident Advisory Boards to increase their awareness and participation in community services and activities. Together with Resident Councils support, we will help to increase engagement, community awareness, and collaboration for events with community partners, such as Strong Family, seasonal events, back to school, and resident meetings.

Spartanburg Housing will continue to administer our Family Self-Sufficiency (FSS) Program for both public housing residents and Housing Choice Voucher recipients. The FSS 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 them toward a path of self-sufficiency. ~~Spartanburg Housing will apply for an AmeriCorps to provide program case management and financial literacy to support our FSS program and individuals needing assistance with financial management. Spartanburg Housing will continue to provide internship placements for the University of South Carolina-Upstate. We will provide quarterly financial workshops facilitated by our new partners Carolina Foothills Credit Union, to assist with our efforts of economic mobility and YMA Wealth for pre-homebuyers education.~~ The long-term goal is to increase resident income and employability residents.

Spartanburg Housing will continue to provide access to internet and computers located within our public housing communities, to allow residents 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. A new partnership with Goodwill Mission Mobile will enhance employment readiness services. We will strengthen our partnership with ReGenesis Healthcare by providing greater access for resident healthcare services.

In our efforts to ensure Elderly and Disabled residents age independently 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 extend services to provide Adult Day Health program for individuals receiving Medicaid for additional support at our Archibald Rutledge Site. We will collaborate with partners on food access and exercise classes through local hospitals. ~~Spartanburg Housing will apply for collaborative grant opportunities with American Heart Association to assist with blood pressure checks, food access, and health plans.~~

Spartanburg Housing will put a focus on Youth and Young Adult Programs. Spartanburg Housing provides the Determined Minds After-School Program at two public housing sites for youth Pre-K-4K - 12th grade to ensure they have an atmosphere to complete homework and receive support. Extending the program to have supportive staff to assist with parent engagement and enrollment of after school. Spartanburg Housing will collaborate with multiple agencies for funding and connectivity for service for teenagers and young adults. Spartanburg has a youth and young adult program coordinator to develop programs, college tours, educational workshop, and career guidance to ensure this age group feel supported on their direction in life. Ensure they have opportunity for exposure and access to pursue their dreams. Our long-term goal is to reduce generational poverty.

Spartanburg Housing will develop a fundraising plan to support our two funds held at the Spartanburg County Foundation. The funds are Marche Gault Scholarship 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 to increase opportunities for the families we serve. Spartanburg Housing will continue to award scholarships annually to our families enrolled in post-secondary education through a selection process.

Section 3

Spartanburg Housing will take a proactive approach to its procurement activities through implementing an electronic procurement (e-procurement) application and process. In addition, staff will engage in community outreach, such as "Doing Business" meetings for local community (city & county) and business partners to attend and build relationships to improve its Section 3 and Minority & Women Business Enterprise (MWBE) participation in procurement activities.

Spartanburg Housing is committed to providing training and education to local business owners who may qualify as a Section 3 business to become a registered business in the HUD Opportunity Portal.

Section 3 businesses who seek contracted work with Spartanburg Housing are given a preferred status and consideration during the decision-making phase toward awarding a contract.

Safety and Crime Prevention

Spartanburg Housing's properties are within Spartanburg County. All of these properties are under the jurisdiction of either the Spartanburg Police Department (SPD) or the Spartanburg Sheriff's Office. Spartanburg Housing regularly communicates with both agencies regarding community security issues. Spartanburg Housing will continue its efforts to effectively engage with both departments.

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 property has established a resident-staffed Reception Desk, seven days a week, during daytime hours, whereby entry into the building is monitored.

Spartanburg Housing maintains agreement with SPD to provide supplemental patrols as needed, develop, and implement crime prevention strategies.

4. Spartanburg Housing will check criminal history using Yardi resident 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.
5. 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. 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 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.

Spartanburg Housing will provide all applicants with information about VAWA at the time they request an application for housing assistance. Spartanburg Housing will also include such information in all notices of denial of assistance.

Spartanburg Housing will provide all tenants with information about VAWA at the time of admission and at annual reexamination. Spartanburg Housing will also include such information in all lease termination notices.

Whenever Spartanburg Housing has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

Any request for documentation of domestic violence, dating violence, sexual assault, or stalking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

Spartanburg Housing may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, Spartanburg Housing will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by Spartanburg Housing will be in writing.

Once the victim provides documentation, Spartanburg Housing will acknowledge receipt of the documentation within 10 business days.

If presented with conflicting certification documents from members of the same household, Spartanburg Housing will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, Spartanburg Housing will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If Spartanburg Housing does not receive third-party documentation within the required timeframe (and any extensions) Spartanburg Housing will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, Spartanburg Housing will hold separate hearings for the applicants or tenants.

If Spartanburg Housing accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault, or stalking, the PHA will document acceptance of the statement or evidence in the individual's file.

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, Spartanburg Housing will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

Pet Policy

Registration of Pets

Pets must be registered with Spartanburg Housing before they are brought onto the premises.

Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date.

Pets will not be approved to reside in a unit until completion of the registration requirements.

Refusal to Register Pets

Spartanburg Housing will refuse to register a pet if:

1. The pet is not a common household pet as defined in Section 10-II.C. below
2. Keeping the pet would violate any pet restrictions listed in this policy
3. The pet owner fails to provide complete pet registration information, or fails to update the registration annually
4. The applicant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order
5. Spartanburg Housing reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.

If Spartanburg Housing refuses to register a pet, a written notification will be sent to the pet owner within 10 business days of Spartanburg Housing's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with Spartanburg Housing's grievance procedures. **Pet Agreement**

Residents who have been approved to have a pet must enter into a pet agreement with Spartanburg Housing, or the approval of the pet will be withdrawn.

The pet agreement is the resident's certification that he or she has received a copy of Spartanburg Housing's pet policy and applicable house rules, that he or she has read the policies and/or rules, understands them, and agrees to comply with them.

The resident further certifies by signing the pet agreement that he or she understands that noncompliance with Spartanburg Housing's pet policy and applicable house rules may result in the withdrawal of Spartanburg Housing approval of the pet or termination of tenancy.

Definition of "Common Household Pet"

Common household pet means a domesticated animal, such as a dog, cat, bird, or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes.

The following animals are not considered common household pets:

1. Reptiles
2. Rodents
3. Insects
4. Arachnids
5. Wild animals or feral animals
6. Pot-bellied pigs
7. Animals used for commercial breeding

Pet Restrictions

The following animals are not permitted:

1. Any animal whose adult weight will exceed 25 pounds
2. Dogs of the pit bull, rottweiler, chow, or boxer breeds
3. Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations
4. Any animal not permitted under state or local law or code

Number of Pets

Residents may own a maximum of one (1) pet per unit with unit size 0 BR – 3 BR and two (2) pets per unit with size 4 BR – 5 BR, only 1 of which may be a dog.

In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 10 gallons. Such a tank or aquarium will be counted as 1 pet.

Other Requirements

Dogs and cats must be spayed or neutered at the time of registration or, in the case of underage animals, within 30 days of the pet reaching 6 months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.

Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and annually, in conjunction with the resident's annual reexamination.

Spartanburg Housing requires pet owners to pay a non-refundable nominal pet fee.

This fee is intended to cover the reasonable operating costs to the project relating to the presence of pets. Reasonable operating costs to the project relating to the presence of pets include, but are not limited to:

1. Landscaping costs
2. Pest control costs
3. Insurance costs
4. Clean-up costs

The pet fee of \$10.00 will be billed on a monthly basis, and payment will be due 14 calendar days after billing.

Charges for the non-refundable pet fee are not part of rent payable by the resident.

Asset Management

Archibald Village, Archibald Rutledge, Camp Croft Courts and Prince Hall – Plans are being reviewed to determine the best possible options for these sites that may include demolition.

Designated Housing for Elderly and Disabled Families

Spartanburg Housing have designated elderly or designated disabled housing at the following properties: 1 unit at Cambridge Place; JC Bull Apartments (100 units); JC Bull Apartments (32 units) and Page Lake Manor.

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs

At this time, Spartanburg Housing has no plans for any voluntary or mandatory conversion programs.

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program

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 2022.

EXISTING MIXED FINANCE PROPERTIES	TOTAL UNITS	RAD PROJECT BASED VOUCHERS	RAD CONVERSION STRATEGY
<i>Collins Park</i>	<i>100</i>	<i>2452</i>	<i>Refinancing; Closing in 2022</i>
<i>The Ridge at Southport</i>	<i>78</i>	<i>5450</i>	<i>Refinancing; Closing in 2022</i>
<i>Cottage Grove</i>	<i>8</i>	<i>8</i>	<i>Refinancing; Closing in 2022</i>
TOTAL	186	8610	

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

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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% or 9% LIHTC 2023 2024/2025 Substantial Rehabilitation, Demolition, New Construction
Archibald Village	50	4% or 9% LIHTC 2023 2024/2025 Substantial Rehabilitation, Demolition, New Construction
Camp Croft Courts	96	Phased demolition and redevelopment 2024/2025/2025/2026
Cambridge Place	6	Convert "as is"
Prince Hall Apartments	100	Demolition and redevelopment 2024/2025
TOTAL	402	

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% or 9% LIHTC application in 2023 SH may also explore the possibility of demolition and new construction for these sites. *Spartanburg Housing will look to partner with local developers to help create units*

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

Cambridge Place – Preliminary plans show that the property show that the property will be converted as is.

Occupancy by Over- Income Families

At annual or interim reexamination, if a family’s adjusted income exceeds the applicable over-income limit, Spartanburg Housing will document the family file and begin tracking the family’s over-income status.

If one year after the applicable annual or interim reexamination the family’s income continues to exceed the applicable over-income limit, Spartanburg Housing will notify the family in writing that their income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to Spartanburg Housing’s over-income policies.

If two years after the applicable annual or interim reexamination the family’s income continues to exceed the applicable over-income limit, Spartanburg Housing will charge the family a rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit. Spartanburg Housing will notify the family in writing of their new rent amount. The new rent amount will be effective 30 days after Spartanburg Housing’s written notice to the family.

If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with Spartanburg Housing policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. Spartanburg Housing will notify the family in writing that over-income policies no longer apply to them. If the family’s income later exceeds the over-income limit again, the family is entitled to a new two-year grace period.

Spartanburg Housing will begin tracking over-income families once these policies have been adopted, but no later than March 24, 2019.

Spartanburg Housing will not evict or terminate the tenancies of families whose income exceeds the income limit for program eligibility as described at 24 CFR 960.261.

The PHA will rely on the following over-income limits. These numbers will be updated within 60 days of HUD publishing new income limits each year and will be effective for all annual and interim reexaminations once these policies have been adopted.

Family Size	1	2	3	4	5	6	7	8
Over-Income Limit	\$57,120	\$65,280	\$73,440	\$81,480	\$88,080	\$94,560	\$101,040	\$107,640

For families larger than 8 persons, the over-income limit will be calculated by multiplying the applicable very-low-income limit by 2.4.

Occupancy by Police Officers

Spartanburg Housing does not have any units occupied by police officers; however, this amendment may be considered in the future.

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:

- Archibald Village
- Archibald Rutledge
- Cammie Clagett Courts
- Other Spartanburg Housing approved properties

Units with Approved Vacancies for Modernization

Spartanburg Housing has several units with an approved vacancy as they go through modernization. The units include the following:

Property	Unit Number	Reason for Modernization
Archibald Rutledge	206	Water Infiltration
Archibald Rutledge	208	Water Infiltration
Camp Croft Courts	29	Structural Damage
Prince Hall Apartments	1-20	Mold Abatement
Scattered Sites	712 Old Farm Rd.	Extensive Remodeling
Scattered Sites	4134 East Croft Circle	Extensive Remodeling
Scattered Sites	124 Chelsea Street	Extensive Remodeling
Scattered Sites	115 Chelsea Street	Extensive Remodeling

Scattered Sites	108 Rodney Street	Extensive Remodeling
Scattered Sites	360 Concord Ave.	Extensive Remodeling
Scattered Sites	136 Westover Street	Extensive Remodeling
Scattered Sites	511 Crestwood Place	Extensive Remodeling
Scattered Sites	266 Pioneer Place	Extensive Remodeling
Scattered Sites	109 Winterhaven Drive	Extensive Remodeling

Spartanburg Housing seeks to complete renovations if feasible prior to any repositioning efforts as detailed below.

Other Capital Grant Programs

Currently Spartanburg Housing does not have any funded Capital Fund Community Facilities Grants. ~~In 2022, Spartanburg Housing was awarded an Emergency Safety and Security Grants and will be installing Carbon Monoxide detectors in all public housing bedrooms where gas is present in the dwelling unit.~~ Spartanburg Housing reserves the right to apply for other capital grant programs as they become availableavailable.

B.3

Progress Report.

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

In 2020, Spartanburg Housing completed a Strategic Plan which included the following goals that staff seek to achieve over the course of 3 -5 years:

- Enhance Organizational and Operational Excellence
- Ensure Sound Financial Management for Long Term Sustainability
- Preserve and Develop the Housing Portfolio
- Engage in Strategic Partnerships
- Support and Develop Resident and Community Engagement

Below is a detailed listing of the progress that has been made during the first two years of implementing these goals.

Human Resources:

In 2021, Human Resources (HR) updated its policy and procedure manual to align with Spartanburg Housing’s diversity, equity and inclusion efforts. ~~Revisions to the manual removed gender specific references and added a remote work policy. Additionally, HR reviewed processes and requirements that impede internal and external applicant opportunities, to help remove unnecessary barriers. For example, job description sections were reviewed, specific to education and experience requirements, to reduce the possibility of negatively impacting applicant pools and instead promote experience in lieu of education for most entry level positions. Moving forward, revisions to the manual will continue to stay current with Spartanburg Housing policies.~~HR will continue to strive using and implementing best practices, without biases and other unfair labor practices. HR continues to promote training for all staff members. HR continues to engage with staff to encourage communication and engagement as a learning organization.

Finance:

~~FY2021 Annual Audit with findings for the agency.~~

Asset Management:

Throughout this past year, the asset management department has continued to make strides in maintaining a 98% occupancy rate and 98% tenant accounts receivable rate despite the ongoing pandemic. In addition, the vacant unit turnover time at or below 20 days is still a departmental goal. Through the use of the Yardi system of record, staff have been able to improve housing management monitoring and internal reporting tools to maintain a high level of accountability, implementing timely tracking, scheduling and follow up to rent collection, vacancy turn over management, and new leases. The ACOP is updated each year to ensure compliance with HUD requirements.

HCV:

The Housing Choice Voucher Department relaunched the HCV Homeownership program in 2021. Since the relaunch there are multiple families searching for homes and one family closed in ~~February-October 2022 and March 2023~~ bringing the agencies HO total to 27 families. Spartanburg Housing was one of the only housing agencies to utilize all allocated VASS vouchers in South Carolina. 110 RAD PBV vouchers were received when public housing units were converted from the Ridge at Southport, Collins Park and Cottage Grove.

Resident Services and Community Engagement:

The department provides service coordination through grants and HUD subsidies ~~and~~ oversees resident and community engagement activities in collaboration with residents and community partners.

~~In 2024, Spartanburg Housing hosted its Strong Family Event. This annual initiative brings families together with a focus on Health, Education, and Economic Empowerment. It provides a fun and festive atmosphere for parents to bond with their children, receive impactful resources, and enjoy great food and games. In addition, it promotes collaborations with supportive service organizations that provide families with valuable information and support. It combined an outdoor resource fair style event at JC Bull plus family bowling. Over 60 families and 20 vendors participated.~~
~~at CC Woodson. This event included: Vendors, Food, and Spartanburg Housing program Highlights~~

~~The Family Self-Sufficiency (FSS) Program helps public housing and Housing Choice (HCV) households increase their earnings and build assets that may be used for any purpose, such as buying a home or pursuing education. To achieve this, a FSS Coordinator works with a family to identify their financial and employment goals, including education or training, and accessing supportive services, such as credit repair and childcare. Participation is voluntary, up to 5 years, client-driven, and encourages pursuit of long-term higher earnings. There is also a financial incentive. A family that makes increased earnings, and pays higher rent also receives higher payments into an escrow savings account established for them. The FSS Program continued its track record of success. Four 2022 graduates received a total of \$45,926 in earned escrow funds.~~

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~~Spartanburg Housing was able to highlight out FSS program, 2020-2021. Graduated nine (9) individuals receiving a total of \$60,921 and 2019-2020. Graduated four (4) individuals receiving a total of \$10,782.72.~~

The agency ~~administered~~ ~~relaunched~~ the Marche Gault Scholarship Fund. ~~The Spartanburg Housing Scholarship Fund was established in 1997 and later renamed to honor former employee, Marche Gault in 2004. Ms. Gault was instrumental in developing youth programs for Spartanburg Housing residents.~~

The scholarship may be utilized for tuition, books, room and board, and other college expenses at a two- or four-year college or technical school. ~~After a short hiatus during the COVID pandemic, the scholarship opportunity returned. Three Marche Gault Scholarships totaling \$4,000 dollars were awarded to deserving individuals to pursue their ambition of higher education. The awardees attend Duke University, USC Upstate, and Spartanburg Community College.~~

The scholarship fund is administered through the Spartanburg County Foundation. Since 2001, Spartanburg Housing has awarded more than 76 scholarships totaling \$121,347.

~~with the development of a Steering and Selection Committee. The program had been dormant since 2016. Spartanburg Housing awarded \$4000 in Scholarship Funds. Spartanburg Housing launched youth and young adult programming. This need was presented during strategic planning. Through funding received through the Spartanburg Academic Movement, and Connect Spartanburg, and the Rotary Club, the agency was able to provide college tours, field trips, an afterschool program, and a Black History Quiz Bowl Team. developed a basketball team (Spartanburg express, ad partnership with United Way for Winter Warmth items. We now have new partnerships in collaboration with youth programming to include University of South Carolina Upstate., Nessa in your Neighborhood, A Whole New You Coaching Services, Sidewalk of Hope, Bloom Upstate, City of Spartanburg Parks and Recreation, My Brother's Keeper, From Boys to Men, Spartanburg Academic Movement, Connect Spartanburg, Urban League of the Upstate, and Wofford College: Sustainability Class.~~

Spartanburg Housing continues to ensure we bring programs, services, and partnership. We continue to educate our families on mental health, substance abuse, financial literacy, digital literacy, employment readiness, senior and disabled topics, and homeownership, COVID-19 and vaccinations. We have held numerous testing opportunities and vaccination clinic with assistance from DHEC, Spartanburg Regional, Oak Street Health, Regensis Health care, and Legacy Healthcare. Elderly/Disabled Winter Items for Public Housing Sites. We continue a collaborative effort with our Mobile Farmer's Market to ensure our families have access to fresh fruit and vegetables. The resident services team continue to partner with property management and local organizations for holiday events and after school programming including the Determined Minds Afterschool Program, Strong Families Initiative, and National Night Out.

Development:

~~* Fisher Ave: A market rate rental home in Spartanburg Housing's portfolio was damaged in the February 2020 tornado. This home was renovated and utilized to house a relocation Victoria Gardens resident.~~

- Multifamily Bond Issuance: In 2021, Spartanburg Housing began issuing multi-family housing revenue bonds. This is in support of the rehabilitation or new construction of affordable housing. Spartanburg Housing closed on one bond in 2021 and four in 2022.
- Victoria Gardens: Spartanburg Housing successfully completed a \$17,455,558 rehabilitation of Victoria Gardens Apartments through the RAD program. In December 2021, the conversion of construction loan to permanent loan took place in November 2022.
- Completed substantial rehabilitation of three unoccupied scattered sites at 712 Old Farm Road, 124 Chelsea Street, and 108 Rodney
- Started substantial rehabilitation of two unoccupied scattered sites at 4134 East Croft Circle and 115 Chelsea Street
- Refinance of Cottage Grove, Collins Park, Independence Place, and The Ridge at Southport
- RAD conversion of 110 units at Cottage Grove, Collins Park, and The Ridge at Southport
- Sell of occupied scattered site to current tenant living in unit
- Received conditional commitment to construct 24 units (19-1BR & 5-2BR) at Caulder Avenue parcel through SC Housing Small Rental Development Program
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B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.
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B.5 Most Recent Fiscal Year Audit.

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

Y N

(b) If yes, please describe:

1. Finding No. 2021-001: Inadequate Controls over Financial Reporting

Condition: The Authority did not have adequate controls over the financial reporting process and, as a result, material adjustments were posted, including adjustments related to the prior year, that were not reported on the initial filing with HUD's Real Estate Assessment System.

Criteria: The Authority should maintain appropriate controls over the financial reporting process to prevent or detect material misstatements.

Corrective Action Required: The Authority must review and enhance its policies, procedures, and internal controls to ensure that year-end adjustments and reconciliations are performed in a timely and accurate manner. To clear this finding, the Authority must provide us with a copy of the updated policies, procedures and internal controls for our review/acceptance.

HUD Response: The Authority has submitted a copy of the updated policy which outlines steps to address the concerns noted in the findings. The Authority's response is sufficient to close this finding.

2. Finding No. 2021-002: Fraud Losses (Material Weakness)

Condition: The Authority inappropriately made wire transfers to unknown third parties as a direct result of cyber-attacks and phishing scams.

Criteria: The Authority must have proper controls inclusive of information technology controls to prevent and detect instances of cyber-attacks and phishing scams.

Corrective Action Required: The Authority must revise and enhance its information technology and internal controls procedures to ensure that it can detect and prevent fraud in a timely manner. Additionally, The Authority must provide HUD with clarification regarding \$200,000.00 identified as fraudulent wire transfers. Who authorized the transfers? What were the dates and amounts of the transfers. What efforts did the Authority make to recover the funds? What specific steps have the Authority taken to prevent a recurrence? Was a thorough investigation conducted? Have there been any additional fraudulent billings and payments made either before or after the audit period? If so, please provide details.

The Authority must submit answers to the above questions and provide us with a copy of the revised Procedures for our review/acceptance. This finding will remain open until all requested information Has been received and reviewed/accepted by HUD and appropriate recovery efforts have been made.

HUD Response: The Authority has submitted satisfactory answers to all the questions and and has provided assurances that proper measures are in place to preclude recurrence of this activity. The Authority's response is sufficient to close this finding.

C.	Other Document and/or Certification Requirements.
C.1	<p data-bbox="121 430 430 451">Resident Advisory Board (RAB) Comments.</p> <p data-bbox="121 466 462 487">(a) Did the RAB(s) have comments to the PHA Plan?</p> <p data-bbox="121 508 178 550">Y N <input type="checkbox"/> <input type="checkbox"/></p> <p data-bbox="162 577 1047 619">(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>

C.2	Certification by State or Local Officials. Form HUD 50077-SL , <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.
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C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.

Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

<p>C.4</p>	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p>C.5</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

<p>Fair Housing Goal:</p> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p>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.</p> <p>Spartanburg County's Community and Economic Development Department has led 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.</p> <p>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.</p> <p>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.</p> <ol style="list-style-type: none"> 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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<p>Fair Housing Goal:</p> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p>

<p>Fair Housing Goal:</p>

	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p>
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Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type,** and the **Availability of Information,** specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

- Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))
- Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))
- Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))
- Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))
- Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))
- Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))
- Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
- Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))
- Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))
- Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the "Sample PHA Plan Amendment" found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

- HOPE VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)
- Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfpb#4
- Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))
- Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission; 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices](#).

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03](#). (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of 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. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA

fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ..." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.