

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 02/29/2016</b>
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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. The plans informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

**Definitions.**

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

A.	PHA Information.																																
A.1	<p>PHA Name: <u>The Housing Authority of the City of Spartanburg</u></p> <p>PHA Code: <u>SC003</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2017</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>720</u> Number of Housing Choice Vouchers (HCVs) <u>2,290</u> Total Combined Units/Vouchers <u>3,010</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1"> <thead> <tr> <th data-bbox="164 1444 440 1514" rowspan="2">Participating PHAs</th> <th data-bbox="440 1444 573 1514" rowspan="2">PHA Code</th> <th data-bbox="573 1444 870 1514" rowspan="2">Program(s) in the Consortia</th> <th data-bbox="870 1444 1143 1514" rowspan="2">Program(s) not in the Consortia</th> <th colspan="2" data-bbox="1143 1444 1451 1486">No. of Units in Each Program</th> </tr> <tr> <th data-bbox="1143 1486 1289 1514">PH</th> <th data-bbox="1289 1486 1451 1514">HCV</th> </tr> </thead> <tbody> <tr> <td data-bbox="164 1514 440 1612">Lead PHA:</td> <td data-bbox="440 1514 573 1612"></td> <td data-bbox="573 1514 870 1612"></td> <td data-bbox="870 1514 1143 1612"></td> <td data-bbox="1143 1514 1289 1612"></td> <td data-bbox="1289 1514 1451 1612"></td> </tr> <tr> <td data-bbox="164 1612 440 1711"></td> <td data-bbox="440 1612 573 1711"></td> <td data-bbox="573 1612 870 1711"></td> <td data-bbox="870 1612 1143 1711"></td> <td data-bbox="1143 1612 1289 1711"></td> <td data-bbox="1289 1612 1451 1711"></td> </tr> <tr> <td data-bbox="164 1711 440 1810"></td> <td data-bbox="440 1711 573 1810"></td> <td data-bbox="573 1711 870 1810"></td> <td data-bbox="870 1711 1143 1810"></td> <td data-bbox="1143 1711 1289 1810"></td> <td data-bbox="1289 1711 1451 1810"></td> </tr> <tr> <td data-bbox="164 1810 440 1934"></td> <td data-bbox="440 1810 573 1934"></td> <td data-bbox="573 1810 870 1934"></td> <td data-bbox="870 1810 1143 1934"></td> <td data-bbox="1143 1810 1289 1934"></td> <td data-bbox="1289 1810 1451 1934"></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>B.</b>	<b>Annual Plan Elements</b>																																		
<b>B.1</b>	<p><b>Revision of PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y   N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. Need to review (review HUD's definition)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p><b>Statement of Housing Needs and Strategy for Addressing Housing Needs</b></p> <p>The Spartanburg Housing Authority (SHA) 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. SHA does this through its Asset Management Asset Management Program, Housing Choice Voucher (HCV) Program, Mod Rehab Program, and other Affordable / Moderate Income Programs and HUD's Rental Assistance Demonstration (RAD) program.</p> <p>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 HCV and Affordable Housing within the jurisdiction.</p> <p>SHA serves over 3,661 families under its various housing programs (See Table 1 below):</p> <p>Table 1</p> <table border="1"> <thead> <tr> <th>Housing Programs</th> <th>Units</th> <th>Vouchers</th> </tr> </thead> <tbody> <tr> <td>Public Housing</td> <td>720</td> <td></td> </tr> <tr> <td>Housing Choice Voucher (HCV) HCV (Voucher Program)</td> <td></td> <td>1,952</td> </tr> <tr> <td>Mod Rehab</td> <td></td> <td>226</td> </tr> <tr> <td>Affordable/Moderate Income</td> <td>424</td> <td>338</td> </tr> <tr> <td><b>Total</b></td> <td><b>1,144</b></td> <td><b>2,516</b></td> </tr> </tbody> </table> <p>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)</p> <p>Table 2</p> <table border="1"> <thead> <tr> <th>Waiting List by Program</th> <th></th> </tr> </thead> <tbody> <tr> <td>Asset Management</td> <td>1377</td> </tr> <tr> <td>HCV</td> <td>741</td> </tr> <tr> <td>Mod Rehab</td> <td>20</td> </tr> <tr> <td>Project Base</td> <td>26</td> </tr> <tr> <td>Affordable/Moderate Income</td> <td>1415</td> </tr> <tr> <td>RAD</td> <td>367</td> </tr> <tr> <td><b>Total</b></td> <td><b>3946</b></td> </tr> </tbody> </table>	Housing Programs	Units	Vouchers	Public Housing	720		Housing Choice Voucher (HCV) HCV (Voucher Program)		1,952	Mod Rehab		226	Affordable/Moderate Income	424	338	<b>Total</b>	<b>1,144</b>	<b>2,516</b>	Waiting List by Program		Asset Management	1377	HCV	741	Mod Rehab	20	Project Base	26	Affordable/Moderate Income	1415	RAD	367	<b>Total</b>	<b>3946</b>
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The 2016 Median Income for the Spartanburg, SC MSA is \$52,900. Income Limits are based on the family size or number of persons in the family. The average household consists of three members, a parent and two children. Thirty percent of area median income limit (AMI) in the Spartanburg, SC, MSA (Metropolitan Statistical Area) for a family with three is \$20,090. Asset Management Ninety three percent of families in the Asset Management fall below this limit. The Housing Choice Voucher (HCV) participants are at 74% AMI. The Mod Rehab program participants are at 100% of AMI other Affordable Housing Programs in Spartanburg are at 85.3% AMI.

In 2016, SHA opened the HCV waiting list to elderly and disabled households only. SHA may open the HCV waiting list to general populations in 2017.

Households of various races and ethnic groups of families on our waiting lists for Asset Management account as 17.3% White, 70% Black, 1% Asian, and 11.6% Hispanic. Housing Choice Voucher (HCV) Program waiting lists total as 18.3% White, 76.8% Black, .3% Asian, and 3.9% Hispanic. Finally for our other Affordable Housing Programs, those families on the waiting lists amount to 13.5% White, 73% Black, 1.2% Asian, and 12.3% Hispanic.

#### 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 February 2017, there were 4,028 household people on the Spartanburg Housing Authority'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

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

#### Size of Units

SHA's Asset Management units are comprised of various sizes and types of units which include duplexes, garden style apartments, and townhouses, and high-rise apartments.

#### 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. SHA intends to maintain the availability of decent, safe and affordable housing needs by:
  - a. One for one replacements of units repositioned due to RAD.
  - b. Leverage 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, and construct new, rental and Asset Management units where applicable.
  - f. Support efforts by the City of Spartanburg and the Highland Community in the development of a Master Plan for Highland Area.
  - g. Maintain a minimum of 98% occupancy rate. Maintain vacant unit turnover time at or below 20 days.
  - g. Improve housing management monitoring and internal reporting tools maintain a high level of accountability, while implementing timely tracking, scheduling, and follow-up for rent collection efforts, vacancy turnover management, and new leases.
2. Review applications for additional vouchers through the NOFA process.
  - a. The Housing Choice Voucher (HCV) HCV Program may issue an RFP for project based vouchers, or will utilize PBV's in accordance with RAD guidance in an effort to support the increase of affordable assisted housing within the community.

The City's Consolidated Plan reflects a lack of affordable housing as a potential barrier. SHA will enter into a MOU with the City of Spartanburg and the County of Spartanburg to address the HUD, Affirmately Furthering Fair Housing protocol, if implemented by HUD. SHA 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. SHA will seek replacement of Asset Management units lost to the inventory through demolition, mixed finance development, and Housing Choice Voucher (HCV) HCV replacement housing resources. SHA will market the Housing Choice Voucher (HCV) HCV program among owners, particularly those outside of areas of minority and poverty concentration.

### Homeownership

SHA will continue to utilize its HUD approved Section 32 Homeownership Plan to increase homeownership opportunities. It is expected that over the next two years all of the homes in the plan will transistion to RAD. SHA will review regulatory issues with HUD in the administration of a plan in conjunction with NACA. After HUD review, SHA may pilot this program with up to 250 HCV's.

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

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

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

1. A family as defined by HUD and the SHA:
  - 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 the SHA 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.
3. SHA will permanently deny admission to Asset Management 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. SHA will not waive this requirement.
4. SHA 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.
5. SHA purges its waiting list through public notices and letters to applicants every two years.
6. SHA will consider mitigating circumstance when considering denial of assistance based on criminal activity.

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

1. SHA is administering its Self-sufficiency Program as a tool for assisting residents and participants in increasing their wage earning capacity.
2. SHA will continue to administer ROSS grants promoting job training and employment opportunities to families residing in Asset Management properties through our Connections Program. Other grants assist senior and disabled residents to live longer and

more independently in assisted units.

3. SHA has administered a CSS program component designed to foster Job Readiness and Training, Case Management and Referrals, Counseling and Job Placement.

SHA will comply with HUD regulations concerning income mixing in Asset Management properties.

4. Preferences have been implemented for homeless and veterans. The preference will permit homeless veterans to receive additional points when waitlists are open. SHA's HCV program is currently administering a TBRA (tenant based rental assistance program) which provides rental assistance to homeless veterans. Two Hundred Thousand dollars have been provided by HOME funds, through the County of Spartanburg. Approximately 12-15 veterans will be served in unincorporated areas of the county.
5. SHA will seek replacement of Asset Management units lost to the inventory through demolition, mixed finance development, and Housing Choice Voucher (HCV) HCV replacement housing resources. SHA will market the Housing Choice Voucher (HCV) HCV program among owners, particularly those outside of areas of minority and poverty concentration.

## Financial Resources

<b>FEDERAL FUNDS</b>		<b>2016</b>
Low Rent Asset Management Operating fund		3,382,102
Capital Fund Program		2,849,950
Resident Opportunities and Self Sufficiency		251,690
Housing Choice Voucher		10,467,607
New Construction S/R HCV Programs (Cluster)		497,366
Moderate Rehabilitation Program (Cluster)		1,751,371
Multifamily Housing Elderly Service Coordinators		71,365
Special Allocation – Vocational Funds (SC state pass-through)		102,997
CDBG Funds (pass-through from City of Spartanburg)		9,219
HOME Funds (pass-through from City of Spartanburg)		677,397
YouthBuild Program		559,562
<b>Total Federal Grants</b>		<b>21,110,606</b>
<b>OTHER INCOME</b>		
Dwelling Rents		1,741,706
Late Charges, Court Fees, Maintenance		152,953
Gain on disposition of assets		(4,507,325)
Other income		4,087,551
<b>TOTAL RESOURCES</b>		<b>22,585,491</b>

## **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 SHA.

The SHA 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.

## **Homeownership Programs**

SHA has an approved Section 32 Homeownership Program with 17 remaining PHA Scattered Site homes, which are planned to sell. These PHA Scattered Site homes are all in AMP 40 the HUD Sites numbers are 3-11, 3-23, 3-24 and 3-28. SHA will submit a RAD diminimus application for these homes.

### Homeownership

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

1. SHA will submit a disposition application for the homes remaining in the Sec 32 program.
2. SHA 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 SHA 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.
3. Review Lease Purchase Program to increase success in low-income families to becoming first time homeowners. SHA also would like to revise and implement a Lease Purchase Program.

### Housing Choice Voucher Program

Housing Choice Voucher (HCV) HCV Program will continue with its Homeownership Program. SHA is reviewing an option to utilize up to 250 housing choice vouchers in conjunction with the NACA program.

Voucher homeownership program: SHA will continue operation of its homeownership program.

### Housing Choice Voucher Waitlist

The Spartanburg Housing Authority will utilize a lottery system to place applicants on the waiting list for the Housing Choice Voucher Program.

Once the application deadline expires and the waitlist is closed, SHA 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.

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

SHA will amend the HCV waitlist to include a local preference. SHA will adopt a local residency preference for all Housing Choice Voucher waitlists. Local Preferences are used to give a priority to serving applicants on the waitlist that qualify for the preference. Once an applicant is on the waitlist, additional points from any preferences chosen are applied. These additional points move the application to a higher position on the waitlist, allowing the applicant to be served sooner. The local residency preference will be given to applicants who are a resident of Spartanburg County.

SHA will adopt a Displaced by PHA- RAD preference. This preference will have the highest point value.

### **Community Service and Self-Sufficiency Programs**

The Spartanburg Housing Authority will continue to provide resident services through the utilization of HUD funds and grants to Public Housing communities. We will support Resident Councils and Resident Advisory Boards, and work to increase their awareness and participation in community services and activities. SHA will partner with community organizations to provide supportive services to our residents and participants. SHA will continue to administer our Self-Sufficiency Program for both public housing residents and Housing Choice Voucher recipients., SHA administers a ROSS Grants for public housing residents, promoting job training and employment opportunities through theConnections Program. This program consists of job readiness assistance and jraining, case management and referrals, and job jlacement services. These activities mayassist the agency in increasing the income levels of residents currently residing in communities. Additionally, the activities willhelp the residents overcome the barriers of transportation, education, and/or child care. Non-Public Housing Families who live in RAD communities will be assisted in accordance with HUD regulations. SHA partners with local colleges and businesses to offer training and employment opportunities to residents.

SHA has computer labs based in all public housing communities, which allow residents internet access to search for jobs, do homework or research information self-suffiency tools. The Spartanburg Housing Authority also administers a Homeownership Program to encourage and teach public housing residents about Homeownership. Other grants employ Service Coordinators to assist senior and disabled residents to live longer independently in their own apartments.

### **Safety and Crime Prevention**

All of the Spartanburg Housing Authority's public housing properties are within the City Limits of the City of Spartanburg. All of these properties are under the jurisdiction of the Spartanburg Public Safety Department. The Spartanburg Housing Authority portfolio contains units in the



County of Spartanburg, the jurisdiction of the Spartanburg County Sheriff. SHA regularly communicates with both agencies regarding community security issues. SHA will continue its efforts to effectively engage with Spartanburg Public Safety Department (SPSD).

1. SHA, through its agreement with SPSPD 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. SPSPD has established a "HOTLINE" for residents to anonymously report any criminal activities. There is a "Hotspot" form that we pass out to residents to anonymously report crime.
3. The Archibald Rutledge Hi-Rise property has established a resident-staffed Reception Desk, seven days a week, during daytime hours, whereby entry into the building is monitored.
4. SHA maintains agreement with SPSPD to, provide supplemental patrols as needed, develop, and implement crime prevention strategies.
5. SHA will check criminal history using Yardi credit screening, for all applicants who are 18 years of age or older, to determine whether any family member has engaged in violent or drug-related criminal activity.
6. SHA will check criminal history for all applicants 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. SHA will consider mitigating circumstances in accordance with HUD guidance for other offenses.
7. To respond to the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking, SHA will comply with all HUD VAWA regulations.

SPSPD, as part of its agreement with SHA, 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. SHA continues to partner with community groups and Neighborhood Watch organizations.
- b. SHA has improved lighting at Prince Hall and Victoria Gardens
- c. SHA has removed foliage and trees in sight lines at Victoria Gardens to improve law enforcement ability to police the property.

VAWA

The SHA is in compliance with the VAWA provisions issued on December 16, 2016.

## Asset Management

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

### DECONCENTRATION AND INCOME TARGETING

#### 1. Background

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

#### 2. Deconcentration Policy

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

#### 3. Income Targeting

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

#### 4. Fair Housing

No action of the housing authority in attempting to achieve deconcentration and income-mixing shall violate Fair Housing policies.

#### **B.2 New Activities.**

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

Y N

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

## Mixed Finance Modernization of Development

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

### Phase I

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

### Phase II

The second Phase of RAD consists of the 7 properties below. These properties are a combination of existing mixed finance communities that were developed under SHA's former HOPE VI program(s). The total units in each property includes both Asset Management and Non-Asset Management units. The Asset Management units will convert to Project Based Vouchers under the RAD Program. SHA has received a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for these properties and anticipates a RAD conversion closing in 2017.

EXISTING MIXED FINANCE PROPERTIES	TOTAL UNITS	RAD PROJECT BASED VOUCHERS
Country Garden Estates	50	10
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<b>NEW MIXED INCOME PARTNERSHIP</b>		
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*Cedar Springs Townhomes, Collins Park, The Ridge at Southport and Cottage Grove* will convert under the RAD Program with no new financing.

*Country Garden Estates* will convert through refinancing. The initial 15-year Tax Credit compliance period has expired and SHA will exercise its first right of refusal to acquire the property as sole owner. A conventional loan will be utilized to pay off the existing first mortgage and fund some rehabilitation work.

*Cammie Clagett Phase II* – Phase II of the Cammie Clagett RAD conversion will consist of a Transfer of Assistance (TOA) to another site. SHA has partnered with the City of Spartanburg, the Northside Development Group and Spartanburg Housing Partners, a for profit developer, to transfer the remaining 78 RAD replacement units from the Cammie Clagett development to a new construction.

*Single Family Homes* – The single-family homes will be disposed of under a portfolio “diminimus” disposition and will not convert to RAD units. SHA will sell the units at fair market value under an open bid process.

Phase III – The final Phase of the RAD conversion includes the properties listed in the chart below. SHA 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	PROPOSED CONVERSION PLAN
Archibald Rutledge	150	Transfer of Assistance - Disposition
Archibald Village	50	Transfer of Assistance - Disposition
Camp Croft Courts	96	On Site Demolition and New Construction
Victoria Gardens	80	On Site Rehabilitation or Demolition determined by TDC.
<b>NEW MIXED INCOME PARTNERSHIP</b>		
Prince Hall Apartments	100	Section 18 Disposition and Demolition
<b>TOTAL</b>	<b>476</b>	

*Archibald Rutledge and Archibald Village* – SHA proposes to transfer the RAD assistance from the existing properties to other properties throughout Spartanburg County. SHA will work with for profit and non-profit developers as well as existing property owners to determine multiple locations for placement of RAD PBV contracts. Upon completion of the TOA, SHA will dispose of the existing buildings and land at fair market value through a competitive bid process. SHA may propose development of units to support this transition, to the extent that development and financing tools are available.

*Camp Croft Courts* – SHA proposed to redevelop this property through an on-site two phase approach. Half of the existing residents will be temporarily relocated to allow for demolition and new construction of 50% of the apartments. Upon completion of the first phase, a second phase will be done in the same manner with the intent to replace all units on the site.

*Victoria Gardens* – The RAD conversion strategy for Victoria Gardens is a “sale” and rehabilitation of the existing buildings. SHA proposes to form a partnership and using tax exempt bond proceeds and 4% Low Income Housing Tax credits compete substantial rehabilitation of Victoria Gardens. The level of construction work to be performed will require temporary relocation but the rehabilitation work will be phased to minimize any off-site relocation. In the event that rehabilitation is not financially feasible, SHA will consider demolition and new construction to insure one for one replacement, to the extent that development and financing tools are available.

*Prince Hall* – The redevelopment strategy for Prince Hall is to submit a Section 18 disposition based on obsolescence and secure tenant protection vouchers. Residents will have the opportunity to elect permanent relocation options that will include Project Based Vouchers or a Tenant Protection Voucher. SHA will provide intensive relocation case management services and all benefits under URA. SHA will “bank” the land until such time that a redevelopment opportunity arises for the location of the site.

### **Non-smoking Policies**

Smoking is prohibited in the common areas and the dwelling units at Archibald Rutledge Hi-Rise. Designated Smoking Areas were implemented at the site, 25 feet away from all entrances.

US Department of Housing and Urban Development 24CFR part 965 “Instituting Smoke Free Public Housing”. SHA will require all residents to comply with no smoking in any public housing property by August 1, 2018.

## **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, SHA 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.

### **HOUSING CHOICE VOUCHER – ADMINISTRATIVE PLAN UPDATE**

Chapter 4 APPLICATIONS, WAITING LIST AND TENANT SELECTION p. 4-14  
4. III.C. SELECTION METHOD

SHA will adopt a local residency preference for all Housing Choice Voucher waiting lists. Local Preferences are used to give a priority to serving applicants on the wait list that qualify for the preference. Once an applicant is on the wait list, additional points from any preferences chosen are applied. These additional points move the application to a higher position on the wait list, allowing the applicant to be served sooner. The local residency preference will be given to applicants who are a resident of Spartanburg County.

Chapter 5 BRIEFINGS AND VOUCHER ISSUANCE Page 5-14  
5-II.D. VOUCHER ISSUANCE [24 CFR 982.302]

If the SHA determines that there is insufficient funding after a voucher has been issued, the SHA may rescind the voucher and place the affected family back on the waiting list. In the below order:

- Vouchers issued but for which SHA has not yet received a Request for Tenancy Approval (RFTA) will be rescinded based on the date in which they were issued.
- Voucher issued in which SHA has received a Request for Tenancy Approval (RFTA) will be rescinded based on the date in which the RFTA was received starting with the most recently received.

Chapter 8  
HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS  
[24 CFR 982 Subpart I and 24 CFR 982.507]

PART III: RENT REASONABLENESS [24 CFR 982.507]..... 8-21

### **8-III.D. PHA RENT REASONABLENESS METHODOLOGY**

How Market Data Is Collected

#### **SHA Policy**

The SHA has elected to utilize electronic rent reasonableness data supplied by an approved third party vendor. The system must collect and maintain data on market rents in the SHA's jurisdiction. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis.

## Chapter 12 TERMINATION OF ASSISTANCE AND TENANCY p.12-7-8

### Insufficient Funding [24 CFR 982.454]

SHA shall consider, adopt, and implement any or all of the following cost containment or cost reduction measures:

- Adjust Payment Standards
- Adjust Utility Allowances
- Restrict Portability and Moves to within PHA's Jurisdiction
- Ensure Reasonable Rents
- Adjust Subsidy Standards
- Adjust Interim Reexamination Policies and Procedures
- Restrict the Issuance of Vouchers
- Cancel Vouchers in Search Status

Notification of Contract Terminations – SHA shall provide notification of HAP Contract terminations as follows:

- Landlords will be provided with 30 days written notice that the HAP Contract will be terminated in accordance with the terms and conditions of the contract for lack of funding. Contracts shall be terminated as of the last day of the month following the month in which the written notice is provided.
- Participants will be provided with 30 days written notice that their assistance will be terminated in accordance with the provisions of the Administrative Plan and HUD guidance. Participants shall not be entitled to a hearing for termination of assistance under this provision.
- An initial PHA with payment delinquencies of more than 3 months will be provided with a copy of the notices sent to the Owner and Participant. A copy of the Declaration of Insufficient Funding shall be attached to the notice.
- A receiving PHA of a PHA outgoing portable family shall be notified at least 60 days in advance of the effective date of termination of assistance. The receiving PHA may choose to absorb the voucher or terminate assistance. If the receiving PHA terminates the assistance, they shall be responsible for notification to the Owner and Participant.

Order of Priority for Contract Termination – The priority of contract termination shall be based on the date of initial SHA assistance. Contracts shall be terminated in the order of initial contract effective date of a non-elderly and non-disabled family continuously assisted by the SHA. Initial assistance is determined by the date of the first HAP contract that provided assistance to the participant began. This includes outgoing and incoming portable contracts.

Random Selection – In the event the above selection criteria fails to yield a sufficient number of contract terminations necessary to meet funding levels, additional contracts will be selected through a random lottery. Using the assigned voucher number, SHA will randomly select numbers and rank them based on selection. Contracts will be terminated in order of ranking until a sufficient number of contracts have been identified to achieve the required cost reductions.

Responsibility to Maintain Current Contact Information on File – Participants whose voucher is terminated for the reasons under this section, shall be responsible for maintaining current contact information on file with PHA. If future funding permits the reinstatement of assistance and SHA is unable to contact the family by mail due to incorrect information on file, the family will be permanently removed from the program and no further efforts will be made to reinstate assistance. All factors of initial eligibility will be re-assessed prior to reinstatement of a voucher and resumption of assistance. Only families meeting the eligibility requirements will be issued a voucher

Suspension of Housing Assistance Payments – As an alternative to terminating active HAP Contracts, PHA may choose to suspend housing assistance payments for a period of one month in any calendar year. Landlords and participants will be provided with a minimum of a 30 day notice of any such suspension of payments.

Project Based Voucher Exclusion – Project Based Voucher HAP contracts shall be excluded from termination under the provisions above. Due to financing commitments based on the long term provisions of the HAP contract for Project Based Vouchers, PBV HAP contracts shall be excluded from termination for insufficient funding unless funding reductions result in cancellation of all tenant based HAP contracts.

#### RAD RESIDENT PROTECTION

Upon conversion to Project Based Vouchers, the Authority will adopt the RAD resident rights, participation, waiting list and grievance procedures as described below. Additionally, the Spartanburg Housing Authority is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of Public housing by providing SHA with access to private sources of capital to repair and preserve its affordable housing assets.

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

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

#### Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), the Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to reflect exclusion of the following RAD-specific items:

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and
- Changes to the financing structure for each approved RAD conversion.

#### Resident Rights and Participation

1. *No Re-screening of Tenants upon Conversion.* Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. *Right to Return.* Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.

Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. *Renewal of Lease.* Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. *Phase-in of Tenant Rent Increases.* If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases.

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

Three Year Phase-in:



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

*Please Note:* Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

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

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

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

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

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

7. *Resident Procedural Rights.* The following items must be incorporated into both the HCV

Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

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

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

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

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

and the PHA (as owner) or contract administrator.

- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR §982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

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

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

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion.

No other tenant (e.g., tenants who at one time received the EID but **are** not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.,) is covered by this waiver.

#### PBV: Other Miscellaneous Provisions

1. *Access to Records, Including Requests for Information Related to Evaluation of Demonstration*. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. *Additional Monitoring Requirement*. The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

3. *Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3)*. Under existing PBV program rules, projects that qualify as "existing housing" under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as "existing housing."

Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

4. *Establishment of Waiting List.* In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

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

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

A PHA may consider contacting every applicant on the public housing waitlist via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized Asset Management waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized Asset Management waiting list.

Any activities to contact applicants on the Asset Management waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

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

5. *Mandatory Insurance Coverage.* The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. *Agreement Waiver.* For Asset Management conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. *Future Refinancing.* Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. *Administrative Fees for Asset Management Conversions.* For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with Asset Management money. Since the Asset Management funding will not have been transferred to the TBRA account and since this funding is not HCV assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars.

For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full Asset Management funding for the PBV units during this transition period, PHAs will not receive ongoing HCV administrative fee funding during this time.

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

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

### **Other Capital Grant Programs**

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

SHA also has several years of Replacement Housing Factor (RHF) funds. SHA has committed \$541,000 to the Northside, as a financial tool in closing a gap in the 78 RAD units, to be constructed in the Northside. SHA will seek to develop one or more units of public housing in the Southside or Highland area with remaining RAD funds. In addition, SHA will utilize RHF funds for RAD purposes, including expenses for RAD Physical Condition Assessments for properties where SHA has been issued Commitment of Housing Assistance Payments (CHAPs).

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

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

#### Phase I

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

#### Phase II

The second Phase of RAD consists of the 7 properties below. These properties are a combination of existing mixed finance communities that were developed under SHA's former HOPE VI program(s). The total units in each property includes both Asset Management and Non-Asset Management units. The Asset Management units will convert to Project Based Vouchers under the RAD Program. SHA has received a Commitment to Enter into a Housing Assistance Payments Contract (CHAP) for these properties and anticipates a RAD conversion closing in 2017.

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*Camp Croft Courts* – SHA proposed to redevelop this property through an on-site two phase approach. Half of the existing residents will be temporarily relocated to allow for demolition and new construction of 50% of the apartments. Upon completion of the first phase, a second phase will be done in the same manner with the intent to replace all units on the site.

*Victoria Gardens* – The RAD conversion strategy for Victoria Gardens is a “sale” and rehabilitation of the existing buildings. SHA proposes to form a partnership and using tax exempt bond proceeds and 4% Low Income Housing Tax credits compete substantial rehabilitation of Victoria Gardens. The level of construction work to be performed will require temporary relocation but the rehabilitation work will be phased to minimize any off-site relocation. In the event that rehabilitation is not financially feasible, SHA will consider demolition and new construction to insure one for one replacement, to the extent that development and financing tools are available.

*Prince Hall* – The redevelopment strategy for Prince Hall is to submit a Section 18 disposition based on obsolescence and secure tenant protection vouchers. Residents will have the opportunity to elect permanent relocation options that will include Project Based Vouchers or a Tenant Protection Voucher. SHA will provide intensive relocation case management services and all benefits under URA. SHA will “bank” the land until such time that a redevelopment opportunity arises for the location of the site.

SHA will seek to develop through sale, or through development/financial partnerships up to 130 acres of property at Page Lakes.

<b>B.3</b>	<p><b>Civil Rights Certification.</b></p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<b>B.4</b>	<p><b>Most Recent Fiscal Year Audit.</b> <i>Audit comes back in May/June</i></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y    N  <input type="checkbox"/>   <input checked="" type="checkbox"/></p>
<b>B.5</b>	<p>Report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan</p> <p><b>Progress Report.</b></p> <p><b>1. HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.</b></p> <p>1. In 20165 SHA constructed additional public housing Asset Management units on Brawley Street as a part of the Choice Neighborhood initiative for the Northside. The 3 duplex units (total of 6 units) were constructed utilizing primarily Replacement Housing Factor (RHF) Funds. In addition, SHA is working closely with Spartanburg County to construct 8 affordable one bedroom units for seniors on SHA Property located at the Page Lake Property site. These initial 8 one-bedroom units will be constructed primarily with HOME Funds from Spartanburg County; although, SHA will provide a small portion of funds through a private mortgage which will be repaid by net operating income over a period of several years. The total cost of the project is \$1,024,865 with the County providing \$703,602 and SHA providing \$321,262. SHA completed construction of eight units at Page Lakes. The County of Spartanburg contributed significantly to the cost of this project by committing home funds. The total development cost was \$1,074,773.89 with SHA providing a loan of \$200,000.00 and a donation of \$197,377.15 in order to close the gap in the Profora. The certificate of occupancy was received on September 9<sup>th</sup> and October 10<sup>th</sup> in 2016.</p> <p>2. <u>Leverage:</u>  During the year SHA Benefited from the successful leverage of 9% Low Income Housing Tax Credits for the Development of Highland Crossing representing \$7.5 million. In addition, SHA is in the process of constructing 8 Senior Units at Page Lake with an approximate cost of \$1 million.</p> <p>3. <u>Acquire or build</u>  Over the past year SHA has completed the construction of 3 Public Housing Asset Management duplexes, totaling 6 units on Brawley Street. This small apartment complex</p>



known as Cambridge Place was constructed primarily with RHF Funds. Presently SHA is constructing constructed 8 senior units in Partnership with Spartanburg County at Page Lake. These units are being constructed primarily with the County's HOME Funds (\$703,602), but SHA is also providing \$321,262. These will be affordable HOME units for low-income families and seniors. These units are scheduled to be completed in June October of 2016. In addition SHA's first RAD Project is in progress. 40 Forty units at SHA's Public Housing Asset Management Complex Cammie Claggett have been demolished. Construction is beginning now ongoing on Highland Crossing which will provide 72 units of affordable housing which will be LIHTC and Section 8 HCV Project Based. This project is scheduled to be completed in the 20176 calendar year. Forty units at Highland were constructed as a result of an approved RAD application, and demolition of 40 units at Cammie Claggett were completed, with occupancy beginning in December 2016. Vouchers for this project were provided by the State Housing Authority.

4. Improve the quality of assisted housing

Utilizing Capital Funds SHA completed site improvements and building improvements which included energy and health and safety items which improved the quality of its assisted housing communities. SHA's second RAD Project is now under way. On January 14, 2016 SHA closed on its SHA7 RAD Project. This Project has converted 338 units in seven former Public Housing Asset Management Projects; Tobias, Gooch, Watson, Barksdale, Leland, Spruce and JC Anderson from Public Housing Asset Management to Tax Credit and Section 8 HCV Project Based Units. Substantial rehabilitation will be completed in every unit. Physical repairs are approximately \$10 million. This project will begin immediately is ongoing and is scheduled to will be completed in this calendar year 2017. In order to facilitate this project, it was necessary that SHA first payoff its existing Capital Fund Financing Program (CFFP) debt. HUD and the lender would not allow SHA to dispose of any additional Public Housing Asset Management units until the debt was repaid. A condition of the CFFP loan was that it could only be repaid with Capital Funds. SHA utilized the majority of its Capital Fund Program and RHF dollars to pay of its CFFP debt. This debt has now been paid off. SHA contributed to an improved quality of life for our residents by purchasing appliances to include, ranges, refrigerators, PTAC units, and water heaters. Approximately \$250,00 was committed to this project. Additionally, SHA has expended \$90,000 on various property improvements, both at the site and in individual units.

5. Voucher Management (SEMAP Scores)

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

6. SHA will continue to provide excellent customer service through the use of its customer service guide.

7. Outreach to landlords and voucher homeownership program

SHA has operated a voucher homeownership program now for a number of years. Since the beginning of our program, we have helped more than 60 families purchase homes through the voucher program.

The SHA will conduct owner outreach to ensure that owners are familiar with the program and its advantages. The SHA will actively recruit property owners with property located outside areas of poverty and minority concentration.

SHA has a HUD approved Section 32 Homeownership Plan and intends to employ strategies which support the sale of the homes. The SHA will continue to develop homeownership opportunities. The SHA will seek to amend the approved Section 32 plan. SHA participated in a Housing Summit in January 2016, where a presentation was made to potential HCV landlords. SHA has held owner interest meetings and participates in the United Way Housing Task Force.

8. Public Housing Asset Management site-based waiting lists:

- a. All of our Public Housing Asset Management sites have site-based waiting lists.
- b. In November of 2016, SHA launched an electronic application portal allowing applicants the opportunity to apply on-line. SHA also launched an electronic payment system, WIPPS via the Yardi system of record. Approximately 80% of all rent payments are made electronically.
- c. The maintenance staff are managing work orders via smart phones. This technology has increase response time and efficiency.

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

1. SHA is administering its Self-sufficiency Program as we seek to increase the wage earning capacity of low income families within targeted communities and promote self-sufficiency.
2. During the past year the SHA administered ROSS grants promoting job training and employment opportunities to families residing in public housing Asset Management through our Connections Program. Other grants assist senior and disabled residents to live longer in their own homes. SHA administers ROSS grants promoting self sufficiency through the Connections Program designed to assist our households with increased education and job readiness programs. Elderly and disabled persons are served via programs supported by HUD subsidy.
3. During the past year the SHA administered a CSS program component designed foster Job Readiness and Training, Case Management and Referrals, Counseling and Job Placement.
4. These activities will assist the agency in increasing the income levels of families currently residing in communities with a concentration of poverty as well as helping residents overcome the barriers of transportation, education and child care.
5. Promote income mixing in public housing Asset Management by assuring access for lower income families into higher income developments:

During past years SHA implemented a preference for families previously displaced due to development activities such as HOPE VI into the return criteria for the new LIHTC communities Collins Park, Independence Place, Summer Place and the Ridge at Southport affordable housing communities to expand opportunities for lower income families to have

access to income developments. Preferences have been implemented for homeless and veterans, homeless veterans would receive additional points qualifying them for a preference.

6. Public Housing Asset Management security improvements:

SHA continues its collaboration with the Spartanburg Public Safety personnel Department to host liaison officers, designated to the SHA communities.

7. SHA continues to partner with community groups and Neighborhood Watch organizations.

8. Designate developments or buildings

During the past year SHA continued its designation of Mix-Population Communities with three communities Archibald Rutledge & Village however SHA desires to designate Archibald as a senior only residence. SHA is in the process of preparing an application/request for this designation which it may submit soon.

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

1. SHA will continue to promote self-sufficiency and asset development. Our Housing Choice Voucher (HCV) Section 8HCV and Public Housing Asset Management FSS Programs will continue to be offered. Non-Public Housing Asset Management FSS families are able to participate in employment readiness and educational opportunities and through the Connections Program, as grant funding permits. SHA administered a Face Forward Program as well as a YouthBuild program funded by the Department of Labor. Both offered residents 17-24 an opportunity to earn their high school diploma, or GED, learn valuable life skills, and job training. Participants earned a stipend while in the program.
2. The FSS and Connections programs continue to leverage community resources which support resident activities in the areas of education, health and job readiness.
3. SHA has computer labs based in all Public Housing Asset Management neighborhoods. The resident computer labs allow the residents internet access where they are able to stay up-to date with the SHA Facebook, Twitter, and Instagram accounts. Do we really want to talk about Social Media? Computer labs allow the residents to search for jobs, do homework and search the internet. SHA provides access to computer labs with internet access at all Asset Management communities.

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

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

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

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

1. SHA continues to administer a YouthBuild and a Face Forward Program to train and assist participants in completing educational goals and preparing work/business opportunities with funding from the Department of Labor. SHA continues to administer a YoutBuild program. One Habitat Home has been completed with support from this program. A second home is scheduled to be constructed during the next fiscal year. SHA will seek to partner with NACA to increase homeownership opportunities for HCV participants
2. SHA will seek to leverage \$1.2mil from the City of Spartanburg's NIP funds for the demolition of Cammie Clagett. This will be accomplished through the sale of individual units at the property to qualified nonprofits, lead by the City of Spartanburg as the responsible entity.
3. SHA will conduct market studies in association with RAD transitions.
4. SHA will solicit Development and Financial partners for support in the reposition of the remaining units in the portfolio.
5. SHA will engage consultants to assist with Community Education regarding RAD. SHA will consider retraining some of its existing staff and may contract with consultants to assist with resident relocation as a result of RAD transitions.
6. SHA may reposition or reduce staff as a result of RAD transitions.

**B.6 Resident Advisory Board (RAB) Comments.**

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

Y N  
☒ ☐

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

Comments from Resident Advisory Board Members on  
Annual and 5 Year Plans  
At Resident Advisory Board Lunch & Learn  
Friday, April 28, 2017  
SHA Executive Boardroom  
12:00PM until 1:30 PM

On Friday, April 28, 2017, the Housing Authority of the City of Spartanburg (SHA) held a Resident Advisory Board Lunch and Learn meeting with the Resident Advisory Board (RAB) in the SHA Executive Boardroom from 12:00PM until 1:30PM. As part of the meeting, the SHA Annual and 5 Year Plans were presented; copies were available upon request. Comments and Suggestions on the plans from the RAB were documented for consideration as additions to the plans.

Attendees are the meeting provided comments as follows with regard to SHA's Annual and 5-Year Plans:

**Responses to Resident Advisory Board Lunch & Learn**

1. **Comment from Resident** Douglas Salters: I had a comment I'd like to make about the TP funds that come from HUD, I understand now that we get \$10/unit, \$2,000/year, now right?  
**Response** Terril Bates: It's \$10/unit per month. Occupancy reports are generated monthly and that is the basis to determine Tenant Protection funds.
2. **Comment from Resident** Douglas Salters: Um, yeah we were just um, on behalf of Archibald Rutledge Resident Council, is there a way we can find out where we stand and how much money is in the account?  
**Response** Terril Bates: Yes, we will produce that information for you.
3. **Comment from Resident** Brenda Thomas: Camp Croft need that too.  
**Response** Terril Bates: We will get the accounting balance of the TP funds for you.
4. **Comment from Resident** Brenda Thomas: I think it's because of the trip we went on, everybody is kinda off-balance on what stuff.  
**Response** Terril Bates: The Resident Council can utilize those funds when needed; if there is a deficit, the Housing Authority can forward what is needed with the expectation of reimbursement once the funds are available.
5. **Comment from Resident** Katrenia Robinson: Let me ask you a question? Why does it take so long for them to take your money out when it is automatically supposed to be drafted?
  - a. **Response** Joe Calicdan: In the ACH transfer process, there are rules that require two banking days for the transaction to take place.
  - b. **Response** from resident Katrenia Robinson: Kind of like it will come out on the 8<sup>th</sup> or the 9<sup>th</sup> from your bank, that's what I'm asking.
  - c. **Response** Terril Bates: We submit to ACH two days after a resident's account is drafted, from there, the resident's bank determines when the account is debited based on that bank's policies.
  - d. **Response** from resident Katrenia Robinson: Cause I be looking up my account like, I know I don't have this much money left. I can do my bills to the T and I can count money.
6. **Comment from Resident** Veronica Cunningham: I have a question about Section 8, a few people I know, including myself, had a problem with Section 8. There's the people that go out and look for homes, and it's nothing out there. I mean it's listed, there will be on on-line, but, it wasn't updated, you know. And when I called, they said they hadn't updated the list, so going out looking for something you couldn't find anything, and you couldn't go online.
  - a. **Response** Terril Bates: Section 8 is a tenant based voucher system, which means we do not dictate where a resident lives. We receive listings from landlords and we place the information on our online available properties. We do not know the condition of the unit or how long it will be available. The landlord is the source of contact for details, and we provide the availability based on what is given to us. The premise of Section 8 is that a tenant goes out to find a place that meets their needs in the area that meets their needs. There are almost 2,000 landlords participating in the program and our role is to provide the subsidy for the resident.
  - b. **Response Veronica Cunningham:** The problem was if you are looking for a two-bedroom or more, you're good, it's easy to find something out there, but people who are looking for a one-bedroom, it's almost like looking for a needle in a haystack.
  - c. **Response** Terril Bates: That is a concern that resides with availability of rental stock from landlords. SHA seeks to provide affordable housing that addresses a variety of available living arrangements. We recently opened the Page Lake development that had all one-bedroom units that were funded by a different entity. Unfortunately, the Section 8 program does not control the availability.
  - d. **Response** Tiffany Askew: Additionally, we maintain a landlord's listing for 60 days, unless they inform us to remove it sooner, or to continue to allow the listing to remain.
  - e. **Response Veronica Cunningham:** Yes, I went to one place, and the place was nice, it was beautiful. They were going to work with me. And I said, how long has this place been on the market? Cause it was really too good to be true. He said a year. I said a year. Something is wrong. It never passed inspection. So, I knew something was wrong. It looked good, but everything that glitters ain't gold.
7. **Comment from Resident** Brenda Thomas: I know that there is a web-site out there, they say it is for Section 8 vouchers, that you can independently go to yourself because my daughter look up some herself, but the problem that she ran into is that a lot of the houses that was already listed, the people were still in it, but there yearly voucher was running out. And they still had the opportunity to either reapply, or move out, and she would have to wait and see. She just couldn't wait that long to see. But yeah, they do have a website for that too.
8. **Comment from Resident** Brenda Thomas: I have another question. I know that when you are on Section 8, and you over income, you lose your Section 8 right?

- a. Response Tiffany Askew: A resident can be over their income limit for 6 months before they are no longer eligible for Section 8.
- b. Response from Resident Brenda Thomas: Ok so, say for instance you're over income, then right after the 6 months is up they lose their job, then what happens?
- c. Response Tiffany Askew: They have to reapply again when the waiting list is open.

These were the only comments provided by the Residents at our meeting.

Resident Advisory Board Meeting

Sign-In Sheet

April 28, 2017

1. Douglas Salters (Archibald)
2. Veronica Cunningham (Archibald)
3. Hakenia Robinson (Archibald)
4. Natalie L. Hurd
5. Ryan Grace
6. Joseph Jackson
7. Likie D. Sargent
8. Allyne Floyd
9. Chita Brown
10. Brenda Thomas
11. Suzanne Young
12. Tiffany Askew (B)
13. Terri Bates
14. \_\_\_\_\_
15. \_\_\_\_\_

**Certification by State or Local Officials.**

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

DRAFT



<b>B.7</b>	
<b>B.8</b>	<p><b>Troubled PHA.</b></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</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<b>C.</b>	<p><b>Statement of Capital Improvements.</b> Required for all PHAs completing this form that administer public housing Asset Management and receive funding from the Capital Fund Program (CFP).</p>

DRAFT

C.1	<p><b>Capital Improvements.</b></p> <p>Attached please find a copy of the Spartanburg Housing Authority's most recently HUD-approved 5-Year Action Plan (HUD-50075.2) which was approved by HUD on September 2, 2015 (copy of HUD letter attached) and by SRA's Board of Commissioners on July 8, 2015. Copies of the Board Resolutions are also attached. Attached is a copy of the most recent HUD approved Capital Fund Budget</p> <p>With this Annual and 5-Year Plan submittal SHA is also submitting a new Capital Fund Program – Five-Year Action Plan form HUD-50075.2 for the years 2016 – 2020 for approval by HUD. Please find attached a copy of this Plan.</p>
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# Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

## Part I: Summary

Spartanburg Housing Authority – SC003			Spartanburg, South Carolina			<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 2015	Work Statement for Year 2 FFY 2016	Work Statement for Year 3 FFY 2017	Work Statement for Year 4 FFY 2018	Work Statement for Year 5 FFY 2019
B.	Physical Improvements Subtotal	Approved Statement \$468,063.96				
C.	Management Improvements	\$468,063.96	\$268,063.96 \$60,000	\$468,063.96 \$60,000	\$468,063.96 \$60,000	\$468,063.96 \$60,000
D.	PHA-Wide Non-dwelling Structures and Equipment	\$45,000	\$45,000	\$45,000	\$45,000	\$45,000
E.	Administration	\$129,304	\$129,304	\$129,304	\$129,304	\$129,304
F.	Other (Fees and Costs)	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000
G.	Operations	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
H.	Demolition	0	\$200,000	0	0	0
I.	Development	0	0	0	0	0
J.	Capital Fund Financing – Debt Service	\$440,936.04	\$440,936.04	\$440,936.04	\$440,936.04	\$440,936.04
K.	Total CFP Funds	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00
L.	Total Non-CFP Funds	0				
M.	Grand Total	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00	\$1,293,304.00

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

## Spartanburg Housing Authority – SC003

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U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

[illegible]

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

<u>Work Statement for Year 1 FFY 2015</u>	<u>Work Statement for Year 4 FFY 2018</u>			<u>Work Statement for Year 5 FFY 2019</u>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See Appendix A-2	Archibald; Riser (Water from outside)		\$ 468,063.96	Archibald; Riser (Water from outside)		\$ 468,063.96
	Subtotal of Estimated Cost		\$468,063.96	Subtotal of Estimated Cost		\$468,063.96

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

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U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

form HUD-50075.2 (4/2008)



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

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

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

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ^ 5-Year and/or ^ Annual PHA Plan for the PHA fiscal year beginning 2016, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

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

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

The City of Spartanburg Housing Authority  
PHA Name

SC003  
PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 20 16

☒ 5-Year PHA Plan for Fiscal Years 20 17 - 20 21

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

Name of Authorized Official  
Molly Talbot-Metz

Title Board Chair

Signature


Date July 5, 2017

### RESOLUTION #2015-13

**WHEREAS**, the SHA Board of Commissioners have obtained comments from the Resident Advisory Board; published the proper notices regarding the proposed 5 - Year and Annual Plans; and have conducted a Public Hearing according to regulations relative to development, review and approval of the 2015 - 2019 5 - Year Plan and 2015 - 2016 Annual Plan;

**BE IT RESOLVED** that SHA's 5 - Year and Annual Plans are approved as presented and the Board authorizes the Executive Director to execute all of the appropriate documents.

Approved: July 08, 2015

  
Thomas A. Lounds, Jr., Chair  
Spartanburg Housing Authority  
Board of Commissioners

Motion by: Commissioner Suzzy Cole  
Seconded: Commissioner Brenda Thomas

Ayes: Tullis, Thomas, Cole, and Lounds

Nays: None

Absent: Vice Chair Metz and Commissioner Hogan

**Capital Fund Program—Five-Year Action Plan**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

**Part I: Summary**

Part I: Summary						
Spartanburg Housing Authority – SC003		Spartanburg, South Carolina		<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No:	
Development Number and Name		Work Statement for Year 1 FFY 2016	Work Statement for Year 2 FFY 2017	Work Statement for Year 3 FFY 2018	Work Statement for Year 4 FFY 2019	Work Statement for Year 5 FFY 2020
A.						
B.	Physical Improvements Subtotal	Adopted Statement	\$782,678.00	\$782,678.00	\$725,678.00	\$785,678.00
C.	Management Improvements					
D.	PHA-Wide Non-dwelling Structures and Equipment		\$83,000.00	\$83,000.00	\$80,000.00	\$80,000.00
			\$45,000.00	\$45,000.00	\$105,000.00	\$45,000.00
E.	Administration		\$128,964.00	\$128,964.00	\$128,964.00	\$128,964.00
F.	Other (Fees and Costs)		\$150,000.00	\$150,000.00	\$150,000.00	\$150,000.00
G.	Operations		\$100,000.00	\$100,000.00	\$100,000.00	\$100,000.00
H.	Demolition		0	0	0	0
I.	Development		0	0	0	0
J.	Capital Fund Financing – Debt Service		0	0	0	0
K.	Total CFP Funds		\$1,289,642.00	\$1,289,642.00	\$1,289,642.00	\$1,289,642.00
L.	Total Non-CFP Funds		0	0	0	0
M.	Grand Total	\$1,289,642.00	\$1,289,642.00	\$1,289,642.00	\$1,289,642.00	\$1,289,642.00

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2001

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Expires 4/30/2001

form HUD-50075.2 (4/2008)

**Capital Fund Program—Five-Year Action Plan**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY <u>2016</u>	Work Statement for Year <u>4</u> FFY <u>2019</u>			Work Statement for Year: <u>5</u> FFY <u>2020</u>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
<i>See</i>	SC003000030/ Archibald Hi-Rise – Asphalt and Concrete	20,000 sq. ft.	\$60,000.00	SC003000080/Prince Hall – Kitchen Cabinets	44 units	\$152,622.00
<i>Annual</i>	SC003000030/ Archibald Hi-Rise – Sealcoat	20,000 sq. ft.	\$80,000.00	SC003000120/Victoria Gardens – Kitchen Cabinets	80 units	\$202,500.00
<i>Statement</i>	SC003000030/ Archibald Hi-Rise – Striping	20,000 sq. ft.	\$5,000.00	SC003000120/Victoria Gardens – Counters and Sinks	28 units	\$100,000.00
	SC003000080/Prince Hall – Interior Painting	58 units	\$140,000.00	SC003000120/Victoria Gardens – Exterior paint and caulking	80 units	\$243,000.00
	SC003000120/Victoria Gardens - Interior Painting	25 units	\$45,800.00	SC003000080/Prince Hall – Exterior doors	100 units	\$87,556.00
	SC003000120/Victoria Gardens – Bathroom Flooring	80 units	\$97,200.00			
	SC003000120/Victoria Gardens – Vanities	80 units	\$24,300.00			
	SC003000120/Victoria Gardens – Commodores	80 units	\$16,000.00			
	SC003000080/Prince Hall – Flooring	25 units	\$40,000.00			
	SC003000080/Prince Hall – Commodores	100 units	\$20,000.00			
	SC003000080/Prince Hall – Kitchen Cabinets	56 units (balance of 44 in 2020)	\$197,378.00			
	Subtotal of Estimated Cost		\$725,678.00	Subtotal of Estimated Cost		\$785,678.00

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2001

form HUD-50075.2 (4/2008)



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Office of Public and Indian Housing  
Expires 4/30/2001

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## 2016 Capital Fund

**Capital Fund Program  
(CFP) Amendment  
To The Consolidated Annual Contributions  
Contract (form HUD-53012)**

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

Whereas, (Public Housing Authority)	HOUSING AUTHORITY OF SPARTANBURG	SC003	(herein called the "PHA")
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions Contract(s) ACC(s) Number(s) A4085 dated 12/10/2001			

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out development, capital and management activities at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ \$1,289,642.00 for Fiscal Year 2016 to be referred to under Capital Fund Grant Number SC16P00350116  
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number \_\_\_\_\_

Now Therefore, the ACC(s) is (are) amended as follows:

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP

assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.

8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).  
(mark one): ☐ Yes ☐ No

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 4/13/2016. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By _____ Date: _____ Title _____	PHA (Executive Director or authorized agent) By <u><i>Terrell Bates</i></u> Date: <u>2/18/16</u> Title <u>EXECUTIVE DIRECTOR</u>
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Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

<b>Part I: Summary</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: SC16P00350116 Replacement Housing Factor Grant No: Date of CFFP:		<b>FFY of Grant: 2016</b> <b>FFY of Grant Approval:</b>	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Final Performance and Evaluation Report		<input type="checkbox"/> Revised Annual Statement (revision no: )	
<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Revised<sup>2</sup></b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup> Expended</b>
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>	100,000.00			
3	1408 Management Improvements	180,500.00			
4	1410 Administration (may not exceed 10% of line 21)	128,964.00			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	150,000.00			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	685,178.00			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	45,000.00			
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFF Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval:	
PHA Name: Spartanburg Housing Authority	Grant Type and Number Capital Fund Program Grant No: SC16P00350116 Replacement Housing Factor Grant No: Date of CFPP:		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost Original	Total Actual Cost <sup>1</sup> Revised <sup>2</sup> Obligated Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,289,642.00	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Date 03/16/2016	Signature of Public Housing Director
			Date

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFPP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

Part II: Supporting Pages			Federal FFY of Grant: 2016			
PHA Name: Spartanburg Housing Authority		Grant Type and Number Capital Fund Program Grant No: SC16P00350116 CFFP (Yes/ No):		Replacement Housing Factor Grant No:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost Original	Total Actual Cost Funds Obligated <sup>2</sup> Revised <sup>1</sup> Funds Expended <sup>2</sup>	Status of Work
PHA-Wide	Operations	1406		100,000.00		
PHA-Wide	Community Initiatives	1408		10,000.00		
PHA-Wide	Staff Development	1408		50,000.00		
PHA-Wide	Security Cameras	1408		65,500.00		
PHA-Wide	Legal Fees	1408		50,000.00		
PHA-Wide	Computer Lab	1408		5,000.00		
	<b>TOTAL 1408 (13.996%)</b>	<b>1408</b>		<b>180,500.00</b>		
PHA-Wide	CFP Staff Salaries	1410		97,000.00		
PHA-Wide	CFP Staff Benefits	1410		31,964.00		
	<b>TOTAL 1410 (09.999%)</b>	<b>1410</b>		<b>128,964.00</b>		
PHA-Wide	A&E Services: Sewer Camera, Roof Assessments, Mold Assessments, Erosion Gutters, Brick Façade, Sewer Lines, Roofing and Gutters, Environmental Assessments	1430		100,000.00		
PHA-Wide	Inspection of Capital Fund Work	1410		50,000.00		

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.