



# Five Year Plan (2020-2024)

(OCTOBER 1, 2019 – SEPTEMBER 30, 2024)



The Sanford Housing Authority (SHA) administers the public housing and housing choice voucher programs. SHA is required to operate via the Asset Management Model because of the number of units in which it has in total (public housing and housing choice voucher units). The U.S. Department of Housing and Urban Development (HUD) established the maximum number of public housing units SHA could build. The information below is taken directly from HUD's website ([www.hud.gov](http://www.hud.gov)).

### **Faircloth Limits**

HUD established faircloth limits for the maximum number of public housing units a housing authority could build. Section 9(g)(3) of the United States Housing Act of 1937 ("Faircloth Amendment") limits the construction of new public housing units. The Faircloth Amendment states that the Department cannot fund the construction or operation of new public housing units with Capital or Operating Funds if the construction of those units would result in a net increase in the number of units the Public Housing Authority (PHA) owned, assisted or operated as of October 1, 1999. SHA's faircloth limit is 465 public housing units. This requirement is referred to as the "Faircloth Limit." The Faircloth Limit is adjusted for PHA transfers of Annual Contribution Contract (ACC) units, consolidations, and Rental Assistance Demonstration (RAD) removals. PHAs will not be funded for those units that exceed the Faircloth limit, and PHAs are responsible for reviewing the Faircloth limits and notifying HUD if they believe their posted Faircloth Limit is in error.

### **Public Housing**

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments for elderly families. There are approximately 1.2 million households living in public housing units, managed by some 3,300 HAs. The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies (HAs) that manage the housing for low-income residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments.

Public housing is limited to low-income families and individuals. SHA determines eligibility based on: 1) annual gross income; 2) whether someone qualifies as elderly, a person with a disability, or as a family; and 3) U.S. citizenship or eligible immigration status. If a person is eligible, the SHA will check references to make sure the family will be good tenants. SHA will deny admission to any applicant whose habits and practices may be expected to have a detrimental effect on other tenants or on the project's environment.

SHA uses [income limits](#) developed by HUD. HUD sets the lower income limits at 80% and very low-income limits at 50% of the median income for the county or metropolitan area in which you choose to live. [Income limits](#) vary from area to area so you may be eligible at one HA but not at another. The public housing program's eligibility requirement is for households at or below 80% of the median income for Lee County. **The 2019 Lee and Harnett County income limits (to be inserted once released):**

Rent, which is referred to as the Total Tenant Payment (TTP) in this program, would be based on the family's anticipated gross annual income less deductions, if any. HUD regulations allow SHA to exclude from annual income the following allowances: \$480 for each dependent; \$400 for any

elderly family, or a person with a disability; and some medical deductions for families headed by an elderly person or a person with disabilities. Based on an application, the SHA representative will determine if any of the allowable deductions should be subtracted from your annual income. Annual income is the anticipated total income from all sources received from the family head and spouse, and each additional member of the family 18 years of age or older.

The formula used in determining the TTP is the highest of the following, rounded to the nearest dollar:

- (1) 30 percent of the monthly adjusted income. (Monthly Adjusted Income is annual income less deductions allowed by the regulations);
- (2) 10 percent of monthly income;
- (3) welfare rent, if applicable; or
- (4) a \$50 minimum rent or higher amount set by an HA.

SHA is responsible for the management and operation of its local public housing program but may also operate other types of housing programs.

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### **Housing Choice Voucher**

The housing choice voucher program, formerly known as the Section 8 program, is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments.

The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

Housing choice vouchers are administered by SHA. The SHA receives federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.

A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. This unit may include the family's present residence. Rental units must meet minimum standards of health and safety, as determined by HUD and SHA.

A housing subsidy is paid to the landlord directly by the SHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Under certain circumstances, if authorized by the SHA, a family may use its voucher to assist with the purchase a modest home, provided they qualify for a mortgage with a lending institution.

Eligibility for a housing voucher is determined by the SHA based on the total annual gross income and family size and is limited to US citizens and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live. By law, SHA must provide 75 percent of its voucher to applicants whose incomes do not exceed 30 percent of the area median income. Median income levels are published by HUD and vary by location.

During the application process, the SHA will collect information on family income, assets, and family composition. The SHA will verify this information with other local agencies, your employer and bank, and will use the information to determine program eligibility and the amount of the housing assistance payment.

The housing choice voucher program places the choice of housing in the hands of the individual family. A very low-income family is selected by the SHA to participate is encouraged to consider several housing choices to secure the best housing for the family needs. A housing voucher holder is advised of the unit size for which it is eligible based on family size and composition.

The housing unit selected by the family must meet an acceptable level of health and safety before SHA can approve the unit. When the voucher holder finds a unit that it wishes to occupy and reaches an agreement with the landlord over the lease terms, the SHA must inspect the dwelling and determine that the rent requested is reasonable.

The SHA determines a payment standard that is the amount generally needed to rent a moderately-priced dwelling unit in the local housing market and that is used to calculate the amount of housing assistance a family will receive. However, the payment standard does not limit and does not affect the amount of rent a landlord may charge or the family may pay. A family which receives a housing voucher can select a unit with a rent that is below or above the payment standard. The housing voucher family must pay 30% of its monthly adjusted gross income for rent and utilities, and if the unit rent is greater than the payment standard the family is required to pay the additional amount. By law, whenever a family moves to a new unit where the rent exceeds the payment standard, the family may not pay more than 40 percent of its adjusted monthly income for rent.

The SHA calculates the maximum amount of housing assistance allowable. The maximum housing assistance is generally the lesser of the payment standard minus 30% of the family's monthly adjusted income or the gross rent for the unit minus 30% of monthly adjusted income.

Once SHA approves an eligible family's housing unit, the family and the landlord sign a lease, and, at the same time, the landlord and the SHA sign a housing assistance payments contract that runs for the same term as the lease. This means that everyone -- tenant, landlord and SHA -- has obligations and responsibilities under the voucher program.

When a family selects a housing unit, and the SHA approves the unit and lease, the family signs a lease with the landlord for at least one year. The tenant may be required to pay a security deposit to the landlord. After the first year the landlord may initiate a new lease or allow the family to remain in the unit on a month-to-month lease.

When the family is settled in a new home, the family is expected to comply with the landlord's lease and the program requirements, pay its share of rent on time, maintain the unit in good condition and notify the SHA of any changes in income or family composition.

The role of the landlord in the voucher program is to provide decent, safe, and sanitary housing to a tenant at a reasonable rent. The dwelling unit must pass the program's housing quality standards and be maintained up to those standards as long as the owner receives housing assistance payments. In addition, the landlord is expected to provide the services agreed to as part of the lease signed with the tenant and the contract signed with the SHA.

The SHA administers the voucher program locally. The SHA provides a family with the housing assistance that enables the family to seek out suitable housing and the SHA enters into a contract with the landlord to provide housing assistance payments on behalf of the family. If the landlord fails to meet the owner's obligations under the lease, the SHA has the right to terminate assistance payments. The SHA must reexamine the family's income and composition at least annually (unless otherwise allowed by HUD) and must inspect each unit at least annually to ensure that it meets minimum housing quality standards.

To cover the cost of the program, HUD provides funds to allow SHA to make housing assistance payments on behalf of the families. HUD also pays the SHA a fee (administrative fee) for the costs of administering the program.

### **Asset Management**

There are five key component areas of the asset management model, project-based funding, project-based budgeting, project-based accounting, project-based management and project-based oversight/performance assessment.

Under **project-based funding**, PHAs will complete a separate subsidy form for each project. A major component of a project's subsidy calculation will be its Project Expense Level, or PEL. The PEL is a model-generated estimate of the cost to operate the project, excluding utilities and taxes. It is based on the costs of operating other federally-assisted housing projects with similar characteristics (building type, location, number of bedrooms per unit, etc.).

Along with project-based funding, PHAs will be required to undertake **project-based budgeting**, the next building block of asset management. Essentially, project-based budgeting means that operating budgets will now be completed at the project-level as opposed to the PHA or entity-wide level.

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- Primarily, project-based budgets will be used for internal PHA planning purposes.
  - Project-based budgets must be approved by the PHA's Board prior to the start of each fiscal year.
  - However, these budgets will not be subject to HUD approval, except in the case of non-performing properties.
  - HUD does prescribe a specific budget format although the budget should reconcile to the updated Financial Data Schedule (FDS).

The third core reform under asset management is **project-based accounting**. Project-based accounting provides the ability to track financial performance at the project-level. Ultimately, project-based accounting provides the necessary information to make effective decisions at the project-level.

- As with other federally-assisted housing programs, PHAs will be required to submit to HUD year-end financial statements on each project. These financial statements will include revenue, expense, and balance sheet items.
- Further, PHAs will only be able to charge projects for services actually received. For example, in accounting for project costs, PHAs will not be permitted simply to spread the cost of central maintenance across projects.
- Lastly, any overhead fees and any fees for centrally-provided property management services, must be considered reasonable. This means that the costs must not exceed what other efficient operators would incur for those same services in the local market.

As part of asset management, PHAs must also convert to **project-based management (PBM)**, the forth building block of asset management. As stated in 24 CFR 990.275:

- PBM is the provision of property-based management services that is tailored to the unique needs of each property, given the resources available to each property. Under PBM, [these] property management services are arranged, coordinated or overseen by management personnel who have been assigned responsibility for the day-to-day operation of that property and who are charged with direct oversight of operations of that property. Property management services may be arranged or provided centrally; however, in those cases in which property management services are arranged or provided centrally, the arrangement or provision of these services must be done in the best interest of the property, considering such factors as cost and responsiveness.

The final core element of asset management is **project-based oversight/performance assessment**.

Under asset management and, therefore, the new PHAS, each project will be evaluated on its financial and management performance in addition to its physical condition. A central part of this new performance measurement structure will be a system of on-site management reviews of each project. PHAs will also be assessed in the obligation and expenditure of Capital Fund dollars.

As for internal PHA performance measurement, the final rule does not stipulate a specific frequency or manner. PHAs should develop internal mechanisms to monitor the performance of each property in such a frequency or manner that is consistent with best practices in multifamily housing.

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<b>A.</b>	<b>PHA Information.</b>																																
<b>A.1</b>	<p>PHA Name: <u>Sanford Housing Authority</u>      PHA Code: <u>NC035</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 10/2019          PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission      <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p><b>Availability of Information.</b> In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>The Sanford Housing Authority will meet Monday, June 24, 2019 at 6:00 p.m., at its Central Office Board Room, 1000 Carthage Street, Sanford, NC. The purpose of this hearing will be to receive comments and input regarding its proposed 2020-2024 Five-Year Plan and 2020 PHA Annual Plan.</p> <p>As of April 11, 2018, a copy of the draft 2020-2024 Five Year Plan and 2020 PHA Annual Plan will be available for review, between 8:00 a.m. and 5:30 p.m., at the Sanford Housing Authority's Central Office, 1000 Carthage Street; at the Lee and Harnett County libraries; and at the property management offices located in the Linden Heights, Utley Plaza, Stewart Manor, Matthews Court, Gilmore Terrace, and Garden Street communities. It will also be posted on the SHA website at <a href="http://www.sha-nc.org">www.sha-nc.org</a>.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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<b>B.</b>	<b>5-Year Plan.</b> Required for <u>all</u> PHAs completing this form.																																



B.1	<p><b>Mission.</b> State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years.</p> <p><b>The mission of the Sanford Housing Authority is to provide quality and affordable housing to all persons, while empowering families, creating a sense of community, and building partnerships.</b></p>
B.2	<p><b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years.</p> <p><b>Goal - Increase Operational Efficiency</b></p> <p><b>Objective:</b> Prepare and maintain a balanced budget, increase operating efficiency by reducing operating costs by 10%, maintain an average occupancy rate of 98% or greater, maintain rent collections at 95% or greater, perform 100% annual inspections, maintain Housing Choice Voucher Program lease-up or utilization rate at 95% or greater, secure public and private resources, and earn developers fees to assist with increased affordable housing opportunities. Conduct at a minimum, 10% quality control review and audit of tenant files, inspection reports, waiting lists, etc.</p> <p><b>Goal – Improve Employee and Board Efficiency</b></p> <p><b>Objective:</b> Conduct employee and board trainings annually to improve skills; recruit and retain high-performing employees.</p> <p><b>Goal – Increase Affordable Housing Opportunities and Improve Assets</b></p> <p><b>Objective:</b> Increase affordable housing opportunities by acquiring assets, acquiring land to newly construct housing, and renovating existing assets beginning in the next five years.</p> <p><b>Goal – Improve Resident Independence</b></p> <p><b>Objective:</b> Promote programs, education and training for residents through strong community partnerships, increase the number and percentage of employed persons, provide or attract supportive services to improve employability, support community oriented policing and participation of neighborhood residents in crime reduction strategies, provide financial planning for homeownership to ensure that low/moderate income households are successful, increase counseling availability, increase educational and socialization opportunities for children, increase health and wellness opportunities for seniors, and increase medical assistance for residents without insurance. SHA will apply for at least two grants annually. SHA will ensure at least 50% of caseload is employed. Ensure at least 50% of caseload has escrow accounts.</p> <p><b>Goal – Improve Living Environment</b></p> <p><b>Objective:</b> Enter into contracts with police officers to provide off-duty security at all housing developments. Install additional security cameras, additional lighting, install handicap accessible measures to meet ADA compliance code.</p>



B.3

**Progress Report.** Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

**The Sanford Housing Authority found the following needs, objectives and strategies for addressing housing needs:**

SHA expects to carry out several initiatives such as revitalization of 226 Linden Avenue, a vacant, boarded building, to provide housing for homeless families; and further implementation of a repositioning strategy to address the long-term operating, capital investment, modernization and other needs of SHA's housing inventory.

SHA received funding to renovate 226 Linden Avenue. The renovation costs will be funded by a construction loan (to-be obtained) and a \$350,000 Community Development Block Grant. SHA also received a \$440,000 conditional commitment for the North Carolina Housing Finance Agency's Supportive Housing Development Program permanent loan.

Via the Rental Assistance Demonstration Program, SHA will convert its public housing developments to housing choice voucher units. Thereby, HUD's Declaration of Trust will be removed from the public housing units, allowing SHA to secure funding to make major improvements to its portfolio. SHA received HUD approval to convert seven of its eight housing developments. The first phase of units for conversion is Matthews Court, Garden Street and Gilmore Terrace, a total of 176 units. SHA received an award of low-income housing tax credits and tax-exempt bonds from the North Carolina Housing Finance Agency for major renovations of three of its affordable housing developments: Matthews Court, Garden Street and Gilmore Terrace. Matthews Court is an elderly development, and Garden Street and Gilmore Terrace are family developments.

SHA applied for the funding in 2017 and was notified of the award in February 2018. SHA has since swapped the 2018 low-income housing tax credits for a 2019 allocation. The award includes over \$5.5 million of federal low-income housing tax credits and over \$10.6 million in short-term tax-exempt bond allocation. The low-income housing tax credits will be purchased by a private equity investor, and the tax-exempt bonds will enable SHA to obtain a loan insured by the Federal Housing Administration (FHA) at a low interest rate.

## Community Service and Self-Sufficiency Programs

SHA commits to using housing as a platform to improve outcomes for its residents. Resident Services continuously seeks to secure partnerships with local supportive service agencies to enhance the economic independence of its residents.

SHA was awarded the FY2018 Family Self-Sufficiency (FSS) Grant in the amount of \$105,332. This is the same as last year's grant amount was \$100,839. This grant covers the salaries for the Public Housing and Housing Choice Voucher Program FSS Coordinators.

A recent grant acquisition is ConnectHome USA's Cohort Grant. The grant provides technical assistance to bridge the digital divide among affordable housing tenants. SHA is collaborating with internet service providers, device vendors, and auxiliary organizations to provide low or no cost internet and digital literacy services to residents. SHA places an emphasis on work and education opportunities for residents.

A partnership was formed with NC Works Job Center to host SHA's new Resident Services initiative- the "I Work" program. Beginning April 2018, the I Work program will start as a bi-monthly job prep and placement service for unemployed and underemployed residents. SHA will host this program at NC Works Job Center. Staff will have office, conference room, and computer lab access to assist residents with job searches, resumes, online applications, workshops, and referrals for supportive services such as transportation, childcare, and job skills training.

SHA applied and was accepted as a partner of the Food Bank of North Carolina. This partnership will enable SHA to receive food directly from the Food Bank, maintain a pantry, and distribute food to residents as needed. During fiscal year 2018, SHA operated a Youth Summer Feeding Program at the Garden Street community. School-aged youth were provided breakfast and lunch during the summer break, along with educational reinforcement activities. SHA plans to host the Summer Feeding Program again this year and provide transportation to youth in other SHA communities.

Services and resources coordinated for residents are categorized into 4 (four) broad categories: Family Services, Youth Services, Senior/Disabled Services, and Self-Sufficiency Services. Collectively, all residents are served by resident services programs and services.

SHA links residents to community-based programs as well as facilitate site-based workshops and programs. Thus, accessibility to services is optimized. Service providers for these programs and services include:

Partner	Programs/Classes
Enrichment Center (Sr. Services)	Health & wellness for seniors
Well Centered	Mental health and counseling
Helping Hand Clinic	Medical & pharmaceutical assistance
Christians United Outreach Center of Lee County	Food and clothing
Sanford Job Express	Transportation for jobs, interviews etc.
Daymark Recovery	Mental Health
Coalition for Families	Parenting resources
Lee County Partnership for Children	Childcare resources
Food Bank of Sandhills	Food/Nutrition Resources
Wells Fargo	Financial literacy services
BB&T	Financial literacy services
Johnston-Lee Community Action	Pre-Homebuyers education resources
NC Cooperative Extension	Nutrition resources
Pure Life Church	Faith-based youth services
Christian Provision Ministry	Faith-based youth services
Word of Truth Ministry	Faith-based family services
Partner	Programs/Classes
Star of Hope Church	Faith-based family services
Friendly Dental	Mobile dental services
Lee County Health Department	Health resources/services
ConnectHome USA	Digital literacy resources
Legal Aid of NC	Legal services/tax prep services

SHA partners with job training agencies, institutions of higher learning, financial management organizations, and employers that provide resident opportunities for self-sufficiency as outlined:

Partner	Classes
Job Seekers	Job leads, resume assistance, interview skills
NC Department of Commerce - NC WORKS	Job leads, resume assistance
Boys & Girls Club	Child homework assistance, after school programs
Central Carolina Community College - Human Development Department	GED classes, computer and continuing education classes Certificate & degree programs
Triangle South Workforce Development	Educational and job programs

**Goal - Increase Operational Efficiency:** This goal is to prepare and maintain a balanced budget, increase operating efficiency by reducing operating costs by 10%, maintain an average occupancy rate of 98% or greater, maintain rent collections at 95% or greater, perform 100% annual inspections, maintain Housing Choice Voucher Program lease-up or utilization rate at 95% or greater, secure public and private resources, and earn developers fees to assist with increased affordable housing opportunities.

**Accomplishments:** SHA presented and maintained a balanced 2018 fiscal year budget. SHA's operating costs reduced by 0.659%. SHA maintained an average occupancy rate of 99.37%, while maintaining rent collections at 97%. One hundred percent UPCS inspections were performed for the public housing program and 100% HQS inspections were performed for the housing choice voucher program. The Housing Choice Voucher Program obtained a FY2018 SEMAP score of 100%; it also maintained a utilization rate of 98%.

For fiscal year October 1, 2017 – September 30, 2018, Public Housing accomplishments were as follows:

Performance Measure Definition	FY2018 Target	FY2018 Outcome
<b>Public Housing Program</b>		
<b>Percent Rents Uncollected</b> Gross tenant rents receivable for the fiscal year (FY) divided by the amount of tenant rents billed during the FY.	≤5%	3%
<b>Occupancy Rate</b> The ratio of occupied public housing units available as of the last day of the fiscal year will be greater than or equal to the target benchmark.	≥98%	99.37%
<b>Emergency Work Orders Completed or Abated in &lt;24 Hours</b> The percentage of emergency work orders that completed or abated within 24 hours of issuance of the work order shall be greater than or equal to the target benchmark.	100%	97%
<b>Percent Annual Inspections Completed</b> The percentage of public housing units receiving an inspection prior to the end of the fiscal year.	100%	100%



For fiscal year October 1, 2017 – September 30, 2018, HCV accomplishments were as follows:

Performance Measure Definition	FY2018 Target	FY2018 Outcome
Housing Choice Voucher Program		
<b>Budget Utilization Rate</b> The expenditure of Calendar Year 2018 Housing Choice Vouchers annual budget allocation.	≥98%	98%
<b>Percent Annual Inspections Completed</b> The percentage of all occupied units under contract that are inspected.	100%	100%
<b>Quality Control Inspections</b> The percentage of all previously inspected units having a quality control inspection during the FY shall be equal to or greater than the target by the last day of the Fiscal Year.	17%	20%

**Goal – Improve Employee and Board Efficiency:** Conduct employee and board trainings annually to improve skills; recruit and retain high-performing employees. SHA’s goal is to hold a board retreat annually, and to continuously provide training opportunities to staff and board members.

**Accomplishments:** SHA staff received various trainings. All SHA Staff completed the following trainings: Fair Housing Property Manager, Preventing Conflict of Interest, and Sexual Harassment during the time frame of December 13, 2017 – August 29, 2018. SHA Staff participated individually in additional training such as: Credit and Bond Financing for Affordable Housing Conference, NC Dept of Public Instruction Safe and Healthy School Nutrition Services, Novogradac Property Compliance Certification, Pest Control Certification, FASS-PH Financial Reporting Training – HCV, Advanced PHA Budgeting and Accounting Workshop, NAHRO Certified Specialist of Inspection- Housing Quality Standards, Building Strong Resident Organizations Training, and HCV Housing Quality Standards. Annual board trainings and/or retreats also occurred. SHA will continue to recruit high-performing employees.

SHA opted to participate in the U.S. Department of Housing and Urban Development’s proposed HCV Uniform Physical Condition Standards Voucher Demonstration. SHA staff received classroom and field training in January 2018 from HUD Staff.

**Goal – Increase Affordable Housing Opportunities and Improve Assets:** Increase affordable housing opportunities by acquiring assets, acquiring land to newly construct housing and renovating existing assets.

**Accomplishments:** The goal is to increase affordable housing opportunities (to include the homeless population). SHA will add five units to its portfolio. In the future, SHA or its instrumentality, Central Carolina Strategic Developers, desires to purchase land to construct

housing, or to acquire and renovate existing housing units that it does not currently own.

### **226 Linden Avenue**

The Sanford Housing Authority (SHA) currently owns 226 Linden Avenue, a vacant and boarded building. SHA proposes to renovate the building to comprise of 5 units to serve homeless families.

The unit composition will be 1 two-bedroom unit and 4 one-bedroom permanent housing units. SHA will utilize housing choice voucher project-based assistance to assist with the operating costs of the units. The units will serve persons at or below 30% of the area median income limit and will be based on a site-based waiting list. Applicants will apply directly to the site. This project will support the livability principle of promoting equitable, affordable housing in that it will serve homeless families who will pay 30% of their adjusted household income, per the housing choice voucher program. If the occupants have no income, they will pay a minimum of \$50 towards rent. This project meets the following National Objectives: principally benefits low- and moderate-income persons, and it addresses an urgent need in the community.

The scope of work entails site improvements, environmental tests, abatement of environmental items (interior and exterior), carpentry, flooring, new cabinetry, painting, exterior improvements (handrails, ramp, new windows, siding and soffit, roof replacement, shutters), plumbing, mechanical, electrical, fire protection, appliances, etc. The full scope of work is included as an attachment. It is estimated that the entire project will cost \$781,664.00. Of this project cost, \$350,000 will be in the form of CDBG funding and a construction loan. Permanent funding will be provided via Supportive Housing Development Program funding. The housing choice project-based vouchers, while not associated with the renovation of the property, will provide approximately \$18,738.00 annually in operating assistance; over a guaranteed 15-year Housing Assistance Payment contract, this equates to \$281,070.

### **Partners**

The project partners are the City and County of Sanford, NC and S3 Homeless Connect, which includes agencies such as the Bread of Life, Family Promise, Johnson, Lee, Harnett Community Action, and others, who serve the homeless. Their involvement will bolster the success of the project because SHA is able to receive referrals from these organizations and others, as well as case management services to ensure continued success of the occupants. In addition, SHA will provide case management services. This includes wrap around services such as healthcare referrals, transportation, employment education, childcare, etc. These organizations provide transition or temporary housing. Some also provide case management services, which include locating permanent housing, as well as assisting with various security deposits. One of the next steps to becoming self-sufficient, is obtaining a permanent residency, which would be obtain through the renovation of this property. SHA also applied for funding through the North Carolina Housing Finance Agency's Supportive Housing Development Program.

### **Expected Results and Outcomes:**

The objective is to create permanent, quality, affordable housing for five homeless families (up to 11 homeless individuals). SHA will rejuvenate a vacant, boarded building and bring life to it by renovating the property, as well as by providing housing. It will also spur economic growth in that possibly unemployed persons will become employed, tax-paying citizens Lee County.

It is anticipated that rehabilitation will not exceed 12 months. SHA currently has a contract with an environmental firm; the environmental services should not exceed 20 days of authorization to proceed. Occupancy should occur within 30 days of receiving the certificate of occupancy.

**Mixed Finance Modernization or Development**

**1a. Development Name:** 226 Linden Avenue

**1b. Development (project) number:** None

**1c. Description of development:** 226 Linden Avenue is a vacant, brick building purchased by the Sanford Housing Authority in 2006.

**2. Activity Type:** Mixed Finance Modernization and/or Development

**3. Application Status:** Submitted

**4. Date application submitted:** August 2018 (August 2, 2018 preliminary application; August 30, 2018 full application)

**5. Number of units affected:** 5

**Coverage of action:** Total development

**6. Timeline for activity:**

a. **Projected start date of activity:** 09/30/2019

b. **Projected end date of activity:** 07/31/2020

**Mixed Finance Modernization or Development and Conversion of Public Housing to Project-Based Assistance under RAD.**

Sanford Housing Authority plans to implement Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing and Project-Based Vouchers as described below:



**Mixed Finance Modernization or Development and Conversion of Public Housing to Project-Based Assistance under RAD via the Project-Based Voucher Method, the Project-Based Rental Assistance Method where feasible.**

SHA, per HUD's RAD department's current agreement, will reconfigure the AMP configurations. This is discussed in more detail below.

The previous AMP configurations were:

AMP 1: Linden Heights, Utley Plaza and Foushee Heights.

AMP 2: Stewart Manor and Matthews Court.

AMP 3: Gilmore Terrace, Garden Street and Harris Court.

The current RAD conversion configurations are:

1. Linden Heights, Utley Plaza, Foushee Heights: SHA proposes to self-finance the transaction via a bank loan, capital funds, reserves, a note, etc.
2. Stewart Manor: SHA seeks to apply for 9% low-income housing tax credits in 2021/2022. SHA may seek to redevelop this site along with the Harris Court location. SHA may seek to redevelop this site via new construction.
3. Matthews Court, Garden Street, Gilmore Terrace: SHA will evaluate these developments as a combined 176 unit 4% low-income housing tax credit bond deal.
4. Harris Court: SHA desires to apply for 9% credits in 2021/2022. SHA may seek to redevelop this site via new construction. SHA may seek to redevelop this site along with the Stewart Manor location.

The AMP current configurations are:

**1a. Development Name:** This AMP consists of multiple developments (Linden Heights, Utley Plaza and Foushee Heights), Public Housing Developments.

**1b. Development (project) number:** NC035-01

**1c. Description of development:** Linden Heights offers 46 single and duplex units. The unit size bedroom distribution includes 4 zero-income bedrooms, 16 one-bedroom units, 16 two-bedroom units, 8 three-bedroom units, and 2 four-bedroom units. This community was built in 1965 and the construction is brick and siding.

**Utley Plaza** is a 55-unit single-story complex comprised of 1 one-bedroom units, 48 two-bedroom units, 6 three-bedroom units and 1 management office. This development was constructed in 1981, and the construction is brick.

**Foushee Heights** is our most outlying community, consisting of 40 one-story units. The unit size bedroom distribution includes 34 two-bedroom units and 6 three-bedroom units. This community was constructed in 1984.

SHA will redevelop the sites via a loan, capital funds, reserves, etc. SHA received HUD's approval to implement the Rental Assistance Demonstration (RAD) program. May 2015, SHA received approval to convert its properties under the RAD program.

Units in the developments are currently public housing units, but will be converted to Housing Choice Voucher (also known as Section 8) units under the HUD's RAD program.

Lease-up at the sites has stopped due to relocation preparation. These communities currently have an approved demolition/disposition status. A professional moving company is being solicited to provide the moving services to and from the temporary relocation housing. Moving expenses will be paid by SHA. Any outstanding utility bills are the responsibility of the household. Households will be relocated temporarily to other SHA properties.

It is anticipated that the RAD financing plan will be submitted in 2020.

2. **Activity Type:** Mixed Finance Modernization and/or Development
3. **Application Status:** RAD application awarded May 2015.
4. **Date application submitted:** 02/10/2015
5. **Number of units affected:** 141  
**Coverage of action:** Total development
6. **Timeline for activity:**
  - a. **Projected start date of activity:** 09/01/2021
  - b. **Projected end date of activity:** 06/30/2022

**Mixed Finance Modernization or Development and Conversion of Public Housing to Project-Based Assistance under RAD.**

**1a. Development Name:** Stewart Manor, Public Housing Development

**1b. Development (project) number:** NC035-02

**1c. Description of development:** The **Stewart Manor** high rise offers 99 apartments for rent to elderly and disabled individuals. This development was built in 1976. The unit size bedroom distribution is 39 zero-bedroom units, 56 one-bedroom units and 4 two-bedroom units.

Ultimately, SHA's intentions are to redevelop the site. SHA is seeking reapply to the Rental Assistance Demonstration program in 2018/2019. While SHA previously received a RAD conversion aware, per HUD's request, SHA must reapply. SHA and/or its instrumentality will seek various financial resources to renovate the property.

2. **Activity Type:** Mixed Finance Modernization or Development
3. **Application Status:** SHA will reapply for a RAD conversion (previous RAD application awarded May 2015)
4. **Date application planned for submission:** 06/30/2020 (RAD application)
5. **Number of units affected:** up to 99  
**Coverage of action:** Total development
6. **Timeline for activity:**
  - a. **Projected start date of activity:** 02/28/2021 (Low-Income Housing Tax Credit Preliminary Application Submission)
  - b. **Projected end date of activity:** 12/31/2022

### **Matthews Court, Garden Street, Gilmore Terrace**

The Sanford Housing Authority (SHA) received an award of low-income housing tax credits and tax-exempt bonds from the North Carolina Housing Finance Agency for major renovations of three of its affordable housing developments: Matthews Court, Garden Street and Gilmore Terrace. Matthews Court is an elderly development, and Garden Street and Gilmore Terrace are family developments.

SHA applied for the funding in 2017 and was notified of the award in February 2018. The award includes over \$5.5 million of federal low-income housing tax credits and over \$10.6 million in short-term tax-exempt bond allocation. The low-income housing tax credits will be purchased by a private equity investor, and the tax-exempt bonds will enable SHA to obtain a loan insured by the Federal Housing Administration (FHA) at a low interest rate. According to Shannon Judd, Chief Executive Officer of SHA, these funding sources, along with additional investments from SHA, will allow SHA to carry out much needed renovations for the 176 units in the three developments. "The renovations will include major kitchen and bathroom renovations, new appliances, new flooring, HVAC systems, and additional security cameras, just to name a few of the items.

Units in the developments are currently public housing units but will be converted to Housing Choice Voucher (also known as Section 8) units under the Housing and Urban Development (HUD) Rental Assistance Demonstration (RAD) program. "The conversion enables SHA to privatize the developments and raise the necessary capital for the renovations. All residents currently residing in the developments will have the right to return to the renovated units.

Financing for the renovations is expected to close in 2019, and construction is expected to begin in 2020.

SHA's development entity, Central Carolina Strategic Developers will earn developers' fees as a result of these redevelopment transactions.

SHA intends to expand the number of project-based vouchers in the upcoming years. SHA will convert its public housing portfolio via the project-based voucher method.

In 2017 (SHA's 2018 fiscal year), SHA sold its remaining single-family home located at 308 Crestview Street.

### **Mixed Finance Modernization or Development and Conversion of Public Housing to Project-Based Assistance under RAD.**

**1a. Development Name:** Matthews Court, Garden Street and Gilmore Terrace Public Housing Developments

**1b. Development (project) number:** NC035-02 (Matthews Court); NC035-03 (Garden Street and Gilmore Terrace)

**1c. Description of development:** **Matthews Court** consists of 50 2, 4, and 6-plex unit Groupings that fosters a community minded living arrangement well suited for elderly or disabled tenants. This site offers a management office and onsite laundry facility. This development was built in 1969. The unit size bedroom distribution is 18 zero-bedroom units, 30 one-bedroom units and 2 two-bedroom units. After conversion, the unit size bedroom distribution will be 48 one-bedroom units and 2 two-bedroom units.

Our family-oriented community, the **Garden Street** complex, consists of 56 2- and 4-plex units. A management office, community building and playground is also provided. This development was built in 1971. The unit size bedroom distribution is 20 two-bedroom units and 36 three-bedroom units.

**Gilmore Terrace** offers 70 duplex and single units. It includes an on-site playground. This development was built in 1964. The unit size bedroom distribution is 11 one-bedroom units, 20 two-bedroom units, 22 three-bedroom units, 12 four-bedroom units and 5 five-bedroom units. The community offers a management office, community building and baseball field.

SHA's intentions are to redevelop Matthews Court, Garden Street and Gilmore Terrace. SHA will implement the Rental Assistance Demonstration program. On February 10, 2015, SHA submitted a portfolio conversion application seeking approval to convert all its properties under the RAD program. Units in the developments are currently public housing units, but will be converted to Housing Choice Voucher (also known as Section 8) units under the HUD's RAD program. The conversion enables SHA to privatize the developments and raise the necessary capital for the renovations. SHA received an award of low-income housing tax credits and tax-exempt bonds from the North Carolina Housing Finance Agency for major renovations. SHA applied for the funding in 2017 and was notified of the award in February 2018. The 2018 low-income housing credits were swapped with 2019 low-income housing credits. The award includes over \$5.5 million of federal low-income housing tax credits and over \$10.6 million in short-term tax-exempt bond allocation. The low-income housing tax credits will be purchased by a private equity investor, and the tax-exempt bonds will enable SHA to obtain a loan insured by the Federal Housing Administration (FHA) at a low interest rate.

Lease-up at the sites has stopped due to relocation preparation. These communities currently have an approved demolition/disposition status. A professional moving company is being solicited to provide the moving services to and from the temporary relocation housing. Moving expenses will be paid by SHA. Any outstanding utility bills are the responsibility of the household. Households will be relocated temporarily to other SHA properties.

**2. Activity Type:** Mixed Finance Modernization or Development

**3. Application Status:** RAD application awarded May 2015.

**4. Date application planned for submission:** 02/10/2015

**5. Number of units affected:** 176

**Coverage of action:** Total developments

**6. Timeline for activity:**

**a. Projected start date of activity:** 2019

**b. Projected end date of activity:** 12/31/2021



**Mixed Finance Modernization or Development and Conversion of Public Housing to Project-Based Assistance under RAD.**

**1a. Development Name:** Harris Court, Public Housing Development

**1b. Development (project) number:** NC035-03

**1c. Description of development:** **Harris Court** consists of 26 town houses, 3 & 4-plex units for rent. This development was built in 1973. The unit size bedroom distribution is 17 one-bedroom units and 9 two-bedroom units.

Lease-up at the sites has stopped due to relocation preparation. Ultimately, SHA's intentions are to redevelop the site. SHA and/or its instrumentality will seek various financial resources, to include 9% low-income housing tax credits. It is anticipated that these units will be newly constructed at a different location.

**2. Activity Type:** Mixed Finance Modernization or Development

**3. Application Status:** RAD application awarded May 2015

**4. Date application planned for submission:** 2/10/2015 (RAD); 2021 (LIHTC)

**5. Number of units affected:** 26

**Coverage of action:** Total development

**6. Timeline for activity:**

**a. Projected start date of activity:** 06/30/2020 (Low-Income Housing Tax Credit Preliminary Application Submission)

**b. Projected end date of activity:** 02/28/2021

**(b) Demolition and/or Disposition**

Sanford Housing Authority plans to conduct demolition and disposition activities (pursuant to Section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1427p) as follows:

**Demolition and/or Disposition Activity Description**

**1a. Development Name:** Linden Heights, Utley Plaza, and Foushee Heights, Public Housing Developments

**1b. Development (project) number:** NC035-01

**1c. Description of development:** **Linden Heights** offers 46 single and duplex units. The unit size bedroom distribution includes 4 zero-income bedrooms, 16 one-bedroom units, 16 two-bedroom units, 8 three-bedroom units, and 2 four-bedroom units. This community was built in 1965 and the construction is brick and siding.

**Utley Plaza** is a 55-unit single-story complex comprised of 1 one-bedroom units, 48 two-bedroom units, 6 three-bedroom units and 1 management office. This development was constructed in 1981, and the construction is brick.

**Foushee Heights** is our most outlying community, consisting of 40 one-story units. The unit-size bedroom distribution includes 34 two-bedroom units and 6 three-bedroom units. This community was constructed in 1984.

2. **Activity Type:** Disposition
3. **Application Status:** Under review
4. **Date application planned for submission:** August 2017
5. **Number of units affected:** 141  
Coverage of action: Total development
6. **Timeline for activity:**
  - a. **Projected start date of activity:** 09/01/2021
  - b. **Projected end date of activity:** 06/30/2022

**Demolition and/or Disposition Activity Description**

**1a. Development Name:** Matthews Court, Garden Street and Gilmore Terrace, Public Housing Developments

**1b. Development (project) number:** NC035-03

**1c. Description of development:** **Matthews Court** consists of 50 2, 4, and 6-plex unit groupings that fosters a community minded living arrangement well suited for elderly or disabled tenants. This site offers an onsite laundry facility. This development was built in 1969. The unit size bedroom distribution is 18 zero-bedroom units, 30 one-bedroom units and 2 two-bedroom units.

Our family-oriented community, the **Garden Street** complex, consists of 56 2- and 4-plex units. A playground is provided at this site also. A community center is located at the center of the complex. This development was built in 1971. The unit size bedroom distribution is 20 two-bedroom units and 36 three-bedroom units.

Our family-oriented community, the **Garden Street** complex, consists of 56 2- and 4-plex units. A playground is provided at this site also. A community center is located at the center of the complex. This development was built in 1971. The unit size bedroom distribution is 20 two-bedroom units and 36 three-bedroom units.

**Gilmore Terrace** offers 70 duplex and single units. It includes an on-site playground. A special amenity of this community is that a satellite Boys and Girls Club location is within the complex- perfect for families with children involved in this civic program. This development was built in 1964. The unit size bedroom distribution is 11 one-bedroom units, 20 two-bedroom units, 22 three-bedroom units, 12 four-bedroom units and 5 five-bedroom units.

2. **Activity Type:** Disposition
3. **Application Status:** Under review
4. **Date application planned for submission:** August 2017
5. **Number of units affected:** 176  
Coverage of action: Total development
6. **Timeline for activity:**
  - a. **Projected start date of activity:** 09/01/2019
  - b. **Projected end date of activity:** 12/31/2021

**Demolition and/or Disposition Activity Description**

**1a. Development Name:** Harris Court, Public Housing Development

**1b. Development (project) number:** NC035-03B

**1c. Description of development:** Harris Court consists of 26 town houses, 3 & 4-plex units for rent. This development was built in 1973. The unit size bedroom distribution is 17 one-bedroom units and 9 two-bedroom units.

- 2. **Activity Type:** Disposition
- 3. **Application Status:** Under review
- 4. **Date application planned for submission:** 07/27/2015
- 5. **Number of units affected:** 26  
**Coverage of action:** Total development
- 6. **Timeline for activity:**
  - a. **Projected start date of activity:** 02/28/2022
  - b. **Projected end date of activity:** 02/28/2023

**Demolition and/or Disposition Activity Description**

**1a. Development Name:** Stewart Manor, Public Housing Development

**1b. Development (project) number:** NC035-02

**1c. Description of development:** The Stewart Manor high rise offers 99 apartments for rent to elderly and disabled individuals. This development was built in 1976. The unit size bedroom distribution is 39 zero-bedroom units, 56 one-bedroom units and 4 two-bedroom units.

Ultimately, SHA's intentions are to redevelop the site. SHA is seeking reapply to the Rental Assistance Demonstration program in 2018/2019. While SHA previously received a RAD conversion aware, per HUD's request, SHA must reapply. SHA and/or its instrumentality will seek various financial resources to renovate the property.

- 2. **Activity Type:** Disposition
- 3. **Application Status:** Under review
- 4. **Date application planned for submission:** 03/31/2023
- 5. **Number of units affected:** 26  
**Coverage of action:** Total development
- 6. **Timeline for activity:**
  - a. **Projected start date of activity:** 04/01/2023
  - b. **Projected end date of activity:** 06/30/2025

## Goal – Improve Resident Independence

**Accomplishments:** The goal is to promote programs, education and training for residents through strong community partnerships, increase the number and percentage of employed persons, provide or attract supportive services to improve employability, support community oriented policing and participation of neighborhood residents in crime reduction strategies, provide financial planning for homeownership to ensure that low/moderate income households are successful, increase counseling availability, increase educational and socialization opportunities for children, increase health and wellness opportunities for seniors, and increase medical assistance for residents without insurance. The Public Housing and HCV Programs have 125 persons on the caseloads. Approximately 53% are employed, substantially higher than the general average of housing assisted families.

To enhance outcomes for residents, staff for Resident Services was increased. The addition of a Resident Services Specialist has enhanced Resident Services capacity to coordinate self-sufficiency related activities—some which include workshops on substance abuse, financial planning, senior wellness, and mental health. Also, three food donation events have been held in addition to congregate meals, clothing, toys, necessities, school supplies, educational resources, counseling, mentoring, and holiday events for tenants. Four computer classes were facilitated to build digital literacy. Increased digital literacy has empowered residents to pursue online education, employment, and other self-sufficiency activities.

Residents were referred to Triangle South Workforce Development's short-term training programs with several completing certificates in Certified Nursing, Pharmacy Tech, and Phlebotomy. The iWork Program was established by SHA, to assist residents with employment and job training skills. Resident service staff was provided office space to assist residents with resumes, training, job search and placement. Four Homeownership workshops were held to assist residents with pre-home buyer's education. One Hundred Twenty-Four (124) home visits were conducted to provide residents with information and referrals for services. Twenty financial literacy workshops were conducted. Monthly senior wellness workshops were held to educate seniors on topics of health and nutrition. National Night Out events were held at all SHA properties to bolster community pride and safety. As well as the organization of neighborhood watch in each other communities which Sanford Police departments attend resident meetings. Three mobile dental clinics were provided at SHA family properties enabling children and adults to have no cost dental services where they live. Three medical and insurance organizations provided workshops on services and benefits available to tenants. A Community Family Day Celebration was held to bring families together with food, games, and resources as well as Thanksgiving and Christmas dinners. A Resource Fair was held to introduce local supportive services agencies to tenants. Youth Residents participated in SHA's annual Spring Break College Tour and Back to School celebration where they received free school supplies.

The Sanford Housing Authority is in its second year participating in the ConnectHomeUSA program. The innovative program aims to end the digital divide in public housing across the United States. Sanford is one of 30 communities that were selected after an open application process. EveryoneOn, is the current nonprofit lead for the U.S. Department of Housing and Urban Development's (HUD) successful ConnectHome pilot, which leads this expansion effort. As a cohort, Sanford Housing Authority has access to stakeholder commitments, webinars, mentorship, and other resources to establish broadband internet services throughout each of its eight public housing communities over three years.



## **Goal – Improve Living Environment**

**Accomplishments:** SHA entered into contracts with police officers to provide off-duty security at all of its public housing developments. SHA also installed additional security cameras at Linden Heights and Stewart Manor.

Additional lighting was added in several communities as a crime deterrent and to increase resident safety.

New handicap accessible doors were installed at the Central Office to meet ADA compliance code.

New washers and dryers were installed at the Stewart Manor community.

SHA will continue its efforts to recruit partners for our Crime Task Force. The purpose of this committee is to emphasize working with neighborhood residents to co-produce safety within our communities. It is also to:

- bring together various parties to address criminal and unwanted activities within and surrounding our housing developments
- set up crime watch groups in each housing development
- improve the relationship with residents, law enforcement agencies, and SHA
- educate residents, SHA, and law enforcement

### **Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking Emergency Transfers**

The Sanford Housing Authority (SHA) is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>1</sup> SHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.<sup>2</sup> The ability of SHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether SHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the Public Housing program is in compliance with VAWA.

#### **Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

#### **Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify SHA's management office and submit a written request for a transfer. SHA will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under SHA's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

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<sup>1</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence,

**Confidentiality**

SHA will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives SHA written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act for All Tenants for more information about SHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

**Emergency Transfer Timing and Availability**

SHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. SHA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. SHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If SHA has no safe and available units for which a tenant who needs an emergency is eligible, SHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, SHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

**Safety and Security of Tenants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

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sexual assa, and stalking, regardless of sex, gender identity, or sexual orientation.

<sup>2</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY). Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>. Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

#### **Attachment**

Local organizations aiding victims of domestic violence, dating violence, sexual assault, or stalking:

Lee County Haven 919-774-8923

Sandhills Center 800-256-2452

Therapeutic Alternatives 877-626-1772

Daymark Recovery Services 919-774-6521

**CERTIFICATION OF  
DOMESTIC VIOLENCE,  
DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING,  
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing  
and Urban Development**

OMB Approval No. 2577-0286  
Exp. 06/30/2017

**Purpose of Form:** The Violence Against Women Act ("VAWA") protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

**Use of This Optional Form:** If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

(1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, "professional") from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of "domestic violence," "dating violence," "sexual assault," or "stalking" in HUD's regulations at 24 CFR 5.2003.

(2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or

(3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

**Submission of Documentation:** The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,  
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: \_\_\_\_\_
2. Name of victim: \_\_\_\_\_
3. Your name (if different from victim's): \_\_\_\_\_
4. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_
5. Residence of victim: \_\_\_\_\_
6. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_
7. Relationship of the accused perpetrator to the victim: \_\_\_\_\_
8. Date(s) and times(s) of incident(s) (if known): \_\_\_\_\_  
\_\_\_\_\_
9. Location of incident(s): \_\_\_\_\_

In your own words, briefly describe the incident(s):

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This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

**Public Reporting Burden:** The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.



**EMERGENCY TRANSFER****U.S. Department of Housing  
and Urban Development**OMB Approval No. 2577-  
0286  
Exp. 06/30/2017**REQUEST FOR CERTAIN  
VICTIMS OF DOMESTIC  
VIOLENCE, DATING VIOLENCE,  
SEXUAL ASSAULT, OR STALKING**

**Purpose of Form:** If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

**The requirements you must meet are:**

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.
- (2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

**OR**

**You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer.** If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

**Submission of Documentation:** If you have third-party documentation that demonstrates why you are eligible for an emergency transfer you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

**Confidentiality:** All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER**

1. Name of victim requesting an emergency transfer: \_\_\_\_\_
2. Your name (if different from victim's) \_\_\_\_\_
3. Name(s) of other family member(s) listed on the lease: \_\_\_\_\_
4. Name(s) of other family member(s) who would transfer with the victim: \_\_\_\_\_  
\_\_\_\_\_
5. Address of location from which the victim seeks to transfer: \_\_\_\_\_
6. Address or phone number for contacting the victim: \_\_\_\_\_
7. Name of the accused perpetrator (if known and can be safely disclosed): \_\_\_\_\_
8. Relationship of the accused perpetrator to the victim: \_\_\_\_\_
9. Date(s), Time(s) and location(s) of incident(s): \_\_\_\_\_  
\_\_\_\_\_

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. \_\_\_\_\_

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

\_\_\_\_\_  
\_\_\_\_\_

**12. If voluntarily provided, list any third-party documentation you are providing along with this notice:**

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature \_\_\_\_\_ Signed on (Date) \_\_\_\_\_

## **PART IX: VIOLENCE AGAINST WOMEN ACT (VAWA); NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY**

### **16-IX.A. OVERVIEW**

The Violence against Women Reauthorization Act of 2013 (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault and stalking who are applying for or receiving assistance under the housing choice voucher (HCV) program. If your state or local laws provide greater protection for such victims, those laws take precedence over VAWA.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and PHA policies in three areas: notification, documentation, and confidentiality.

Specific VAWA requirements and PHA policies are located primarily in the following sections:

3-I.C, "Family Breakup and Remaining Member of Tenant Family"; 3-III.G, "Prohibition against Denial of Assistance to Victims of Domestic Violence, Dating Violence, and Stalking"; 10-I.A, "Allowable Moves"; 10-I.B, "Restrictions on Moves"; 12-II.E, "Terminations Related to Domestic Violence, Dating Violence, Sexual Assault or Stalking"; and 12-II.F, "Termination Notice."

### **16-IX.B. DEFINITIONS [24 CFR 5.2003] As used in VAWA:**

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where

- the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship
  - The type of relationship
  - The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- The term *affiliated individual* means, with respect to a person:
  - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that individual stands in the position or place of a parent; or
  - Any other individual, tenant or lawful occupant living in the household of that individual.
- The term *sexual assault* means:

– Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent

- The term *stalking* means:

- To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
- To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
- In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

#### **16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]**

##### **Notification to Public**

SHA adopts the following policy to help ensure that all actual and potential beneficiaries of its HCV program are aware of their rights under VAWA.

##### **SHA Policy**

SHA will post the following information regarding VAWA in its offices and on its Web site. It will also make the information readily available to anyone who requests it.

A summary of the rights and protections provided by VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence dating violence, or stalking (see sample notices in Exhibits 16-1 and 16-2)

The definitions of *domestic violence*, *dating violence*, sexual assault and *stalking* provided in VAWA (included in Exhibits 16-1 and 16-2)

An explanation of the documentation that SHA may require from an individual who claims the protections provided by VAWA (included in Exhibits 16-1 and 16-2)

A copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking

A statement of SHA's obligation to keep confidential any information that it receives from a victim unless (a) SHA has the victim's written permission to release the information, (b) it needs to use the information in an eviction proceeding, or (c) it is compelled by law to release the information (included in Exhibits 16-1 and 16-2)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)

Contact information for local victim advocacy groups or service providers

##### **Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]**

SHA is required to inform program applicants and participants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

**SHA Policy**

SHA will provide all applicants with information about VAWA at the time they request an application for housing assistance. SHA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

SHA will provide all participants with information about VAWA at the time of admission and at annual reexamination. SHA will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the HUD form 5380- Notification of Occupancy Rights and Certification, and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking.

**Notification to Owners and Managers [24 CFR 5.2005(a)(2)]**

SHA is required to notify owners and managers participating in the HCV program of their rights and obligations under VAWA.

**SHA Policy**

SHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the HCV program and at least annually thereafter.

Owners/agents must provide the Notification of Occupancy Rights and Certification with any notice of eviction or termination of assistance.

The VAWA information provided to owners will consist of the HUD form 5380- Notification of Occupancy Rights and Certification, and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking.

**16-IX.D. DOCUMENTATION [24 CFR 5.2007]**

When SHA is presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. SHA may extend this time period at its discretion. [24 CFR 5.2007(a)].

The individual may satisfy SHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:



(1) A completed and signed HUD-approved certification form (HUD-5382- Certification of Domestic Violence, Dating Violence, or Stalking), which must include the name of the Perpetrator only if the name of the perpetrator is safe to provide and is known to the victim.

(2) A federal, state, tribal, territorial, or local police report or court record

(3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical professional. Acceptable documentation also includes a record of an administrative agency, and documentation from a mental health professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

SHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

#### **SHA Policy**

The individual may satisfy SHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

(1) A completed and signed HUD-approved certification form (HUD-5382- Certification of Domestic Violence, Dating Violence, or Stalking), which must include the name of the Perpetrator only if the name of the perpetrator is safe to provide and is known to the victim.

(2) A federal, state, tribal, territorial, or local police report or court record

(3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical professional. Acceptable documentation also includes a record of an administrative agency, and documentation from a mental health professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

#### **Conflicting Documentation [24 CFR 5.2007(e)]**

In cases where SHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, SHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). SHA must honor any court orders issued to protect the victim or to address the distribution of property.

#### **SHA Policy**

If presented with conflicting certification documents (two or more forms HUD-50066) from members of the same household, SHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(b)(2) or (3) and by following any HUD guidance on how such determinations should be made.

**Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]**

SHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b).

**SHA Policy**

If SHA accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault or stalking, SHA will document acceptance of the statement or evidence in the individual's file.

**Failure to Provide Documentation [24 CFR 5.2007(c)]**

In order to deny relief for protection under VAWA, SHA must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as SHA may allow, SHA may deny relief for protection under VAWA.

**16-IX.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]**

All information provided to SHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence, or stalking, must be retained in confidence. This means that SHA (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

**SHA Policy**

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

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

**Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.**

If Converting to PBV: This includes any waiting list preferences that will be adopted for the converted project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.6, Attachment 1B of this Notice and the Joint Housing/PIH Notice H-2014-09/ PIH-2014-17.

**Resident Rights, Participation, Waiting List and Grievance Procedures**

**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.

**Grievance Procedures**

The Public Housing grievance procedure is part of the ACOP, Chapter 14. The entire ACOP has been re-written and approved by the Board of Commissioners. In addition, the public housing lease has been re-written and approved by the Board of Commissioners, to include in Section 20, the agency's Grievance Policy and Procedure for public housing residents.

The Housing Choice Voucher Program informal hearing and review procedures are part of its current Administrative Plan, revised June 2015. Chapter 16, Part III discusses the procedure SHA will follow when a decision is made in the HCVP that has a negative impact on a family. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal review.

The grievance procedure includes the necessary standards and criteria established for SHA applicants, HCV participants and SHA residents will have a fair opportunity for a hearing regarding any SHA action or failure to act involving residents' lease, rights, or welfare.

**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. 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. Currently, SHA's intent is to complete the critical repair items, which should not warrant relocation. If relocation is warranted, SHA will develop relocation plans in accordance with the Uniform Relocation Act and HUD Handbook 1378.

**Renewal of Lease.** Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. This provision will be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

If Converting to PBRA: This includes any waiting list preferences that will be adopted for the converted project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.7 and Attachment 1B of this Notice and the Joint Housing PIH Notice H-2014-09/ PIH-2014-17.

**If there will be a transfer of assistance at the time of conversion, the significant amendment must include:**

The number of units to be transferred.

The bedroom distribution of the units in the new building(s).

The type of units, if changed (e.g., family, elderly/disabled, or elderly-only).

Any reduction or change in the number of units and what reduction category they fall under (i.e. de minimis).

How the waiting list will be transferred and how households will be selected for the transfer, where applicable.

There will not be a transfer of assistance at the time of conversion, therefore, this section is not applicable.

An indication of whether the PHA is currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.

SHA is not currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities. Therefore, this section does not apply.

A statement certifying that the RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

SHA's RAD conversion will comply with all applicable site selection and neighborhood review standards, and all appropriate procedures will be followed. The site selection will comply with all applicable site selection requirements as set forth in this Notice and in accordance with any additional applicable guidance provided by HUD. Site selection requirements set forth at 24 CFR § 983.57 shall apply to RAD conversions to PBV assistance.

SHA understands that for Site selection – Compliance with PBV Goals, section 8(o)(13)(C)(ii) of the Act and 24 CFR § 983.57(b)(1) and (c)(2), HUD waives these provisions having to do with de-concentration of poverty and expanding housing and economic opportunity, for the existing site.

All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.

For MTWs utilizing MTW Fungibility as defined in Section 1.9.E and Section 1.6 or 1.7, as applicable, a statement explaining how the MTW will be able to maintain continued service level requirements. SHA is not an MTW agency. Therefore, this does not apply.

Additionally, in accordance with 24 CFR Part 903, a PHA must perform the following actions regarding their Capital Funds:

During the PHA Plan submission and/or significant amendment stage, a PHA shall notify the public that the current and future Capital Fund Program Grants Budgets, will be reduced as a result of any projects converting to RAD.

The PHA should provide an estimate of the amount of the current Capital Fund grant that is associated with the proposed project(s) and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan.

SHA previously noted in its CFP budget funds associated with future development activities. This did not have a negative impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan. SHA projected utilization of \$19,301.95 from its 2014 CFP grant and \$13,193.64 from its 2015 CFP grant. SHA used \$72,154.96 from its from its 2017 grant. SHA will use \$736,253.00 (estimated) from its 2018 CFP grant. SHA anticipates allocating \$800,000 from its 2019 CFP grant for associated RAD expenses. Any future RAD/development CFP allocations will be noted in the CFP budgets.

If the RAD conversion will impact an existing CFFP or EPC, or it proposes to utilize RHF funds to facilitate conversion, the PHA should also indicate the estimated impact of those activities.

SHA has always included the Capital Fund Financing Program (CFFP) loan payback amount in its Capital Fund Program (CFP) budgets. More recently, SHA included in its CFP budget, additional CFP funds to be used to repay the CFFP loan. The CFFP loan was paid in full March 1, 2018.

Finally, to avoid the need for a possible subsequent significant amendment, the PHA should examine its definition of "Substantial Deviation." The PHA may want to redefine its definition of Substantial Deviation of the PHA Plan to exclude the following items:

**The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;**

Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;

Changes to the construction and rehabilitation plan for each approved RAD conversion; and

Changes to the financing structure for each approved RAD conversion.

**SHA's Significant Amendment Definition (included in HUD-approved Annual /Five Year Plan)**

Significant amendments and substantial deviations/modifications to the Plan are defined as ~~any additional changes that would affect this Agency's mission, goals, objectives, and~~

	<p>policies as stated in the Plan.</p> <p><b>Additional changes are described as follows:</b></p> <p>Changes in rent or admissions policies or organization of the waiting list;</p> <p>Additions of non-emergency work items (items not included in the current Annual Statement or Five-Year Action Plan) or change in the use of replacement reserve funds under the Capital Fund; and</p> <p>Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.</p> <p><b>The following items are <u>excluded</u> from this definition of significant amendment and substantial deviation/modification to the Plan:</b></p> <p>Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include the use of additional Capital Funds;</p> <p>Changes to the construction and rehabilitation plan for each approved RAD conversion; and</p> <p>Changes to the financing structure for each approved RAD conversion.</p> <p>Any significant amendment or substantial deviation/modification to the Plan is subject to the same requirements as for the development/submission of the original Plan (including, timeframes).</p> <p>Please Note: Approval of a PHA's Financing Plan may be delayed if a PHA has made a substantial change to its plans, as defined locally, and the PHA has not completed a new PHA Plan or Significant Amendment to its PHA Plan submission. In addition, if HUD determines that there has been a significant change to the Significant Amendment involving transfers of assistance, changes in the number of assisted units, or a change in eligibility or preferences, HUD may require that a PHA resubmit their Significant Amendment.</p>
<p><b>B.6</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y   N</p> <p><input type="checkbox"/> <input type="checkbox"/> RAB comments, if any, will be included in final Plan document.</p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p><b>B.7</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><i>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>





