

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

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

**Definitions.**

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

<b>A.</b>	<b>PHA Information.</b>
<b>A.1</b>	<p><b>PHA Name:</b> <a href="#">Housing Authority of the City of Greenville, SC</a> <b>PHA Code:</b> <a href="#">SC004</a>  <b>PHA Type:</b> <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): <a href="#">01/2019</a>  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> <a href="#">80</a>  <b>Number of Housing Choice Vouchers (HCVs)</b> <a href="#">2945</a>  <b>Total Combined</b> <a href="#">3025</a>  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual 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 of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post</p>

complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The following are the specific locations where the public may obtain copies of the 2019 Annual PHA Plan.

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

-  Garden Apartments, 80 Thruston Street, Greenville, SC
-  Ridgeway Apartments, 398 Industrial Drive, Greenville, SC

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

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

**B. Annual Plan Elements**

**B.1 Revision of PHA Plan Elements.**

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

Y N

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

(b) The PHA must submit its Deconcentration Policy for Field Office Review. (See attachment SC004b01)

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

**I. STATEMENT OF NEEDS**

**Strategy for Addressing Housing Needs**

Per the city of Greenville’s 2017-2018 Annual Action Plan

Affordability is the most prominent housing problem in the City, and is most difficult for very low-income renter households. In Greenville, very low and extremely low-income households have the most difficulty in finding affordable housing (for less than 30% of their income). The City recently completed a study on affordable housing in the city, summarized in the report: "Balancing Prosperity and Housing Affordability in Greenville: Findings and Recommendations from the Affordable Housing Steering Committee." This study found that the median rent in the City is \$739/month, which requires a salary of at least \$29,560/year (\$12/hour full-time) to be affordable. Approximately 8,500 households in Greenville today, or 32.5% of all households, make less than \$25,000/year, and are therefore unable to afford these median rents.

Counterintuitively, this situation is somewhat exacerbated by a thriving local economy that has brought an influx of new residents that has driven up housing values across the City, especially in neighborhoods near the Central Business District. These new residents are competing for the limited numbers of housing units that are in good shape and near Downtown. This shortage of housing options is felt across the income spectrum, but ultimately affects the number of units that remain affordable. As a result, the city has generated a deficit of 2,500 low-cost (\$500/month) rental units over the past 17 years. This phenomenon, coupled with the fact that most of the rental property available to low and very low income households is owned by a few individuals, means that rents are on the rise.

Additionally, home ownership is out of reach for many low and moderate-income individuals and families. Purchasing a home at the median home value of \$205,000 requires an income of \$68,000, along with a sizeable down payment (\$3,000 if subsidized, and \$41,000 without subsidy). Overall, housing costs are too excessive for lower income families to consider home ownership.

In the City of Greenville, minorities continue to represent a disproportionately higher number of very low and low-income households. The total African-American population of Greenville, at 17,519, comprises 30% of the City's total population. While 7,687 (29%) of all occupied housing units in the City are occupied by African-Americans, a significantly larger percentage of African-Americans are concentrated within the Special Emphasis Neighborhoods. Within the neighborhood setting, the majority of all housing in predominately minority low-income single-family areas is rental. The number of African-Americans living in public or assisted housing is also disproportionately high. Because of these numbers, the City has focused a significant portion of its program resources towards the provision of affordable home ownership and rental opportunities.

The special needs population is typically an underserved group. They include the frail elderly and elderly, disabled, mentally and physically challenged, persons living with HIV/AIDS, and those living with substance abuse problems. Among the housing choices are transitional housing, supportive housing, and subsidized housing. Each has its own distinct needs. Many special needs individuals require supportive services to maintain daily activities.

### **Waiting List for Public Housing**

**Public Housing**

Category	# of families	% of total families	Annual Turnover
Waiting List Total	26		15
Extremely Low Income	18	69%	
Very Low Income	6	23%	
Low Income	2	8%	
Families with Children	0	0%	
Elderly Families	17	65%	
Families with Disabilities	13	50%	
White	2	8%	
Black/African American	24	92%	
Asian	0	0%	
Native Hawaiian/Other Pacific Islander	0	0%	
Hispanic	0	0%	
<b>BEDROOMS</b>			
1 Bedroom	26	100%	
2 Bedroom	0	0%	
3 Bedroom	0	0%	
4 Bedroom	0	01%	
5 Bedroom	0	0%	

The waiting list has been closed for 19 months. (closed on December 1, 2016) The PHA does not expect to reopen the list in the PHA Plan year. It is also important to note that the PHA anticipates all of its public housing developments transition to the Rental Assistance Demonstration (RAD) Program no later than December 31, 2018.

Once the developments transition to RAD, a site based waiting list will open at the appropriate time for Project Based Voucher rental assistance.

### Waiting List for Section 8 (Housing Choice Voucher Program)

<b>Housing Choice Voucher Program</b>			
Category	No.#	Percentage %	Annual Turnover
Waiting List Total	3414		300
Extremely Low Income	2662	78%	
Very Low Income	590	17%	
Low Income	141	4%	
Families with Children	1863	55%	
Elderly Families	439	13%	
Families with Disabilities	571	17%	
White	505	15%	
Black/African American	2618	77%	
American Indian/Alaskan	22	1%	

Asian	6	0%	
Native Hawaiian/Other Pacific Islander	19	1%	
Hispanic	155	5%	

The waiting list has been closed for 5 months. The PHA does not expect to reopen the list in the PHA plan year.

**a. Need: Shortage of affordable housing for all eligible populations**

*PHA shall maximize the number of affordable units available to the PHA within its current resources by:*

- *Seek replacement of public housing units lost to the inventory through mixed finance development.*
- *Maintain or increase Housing Choice Voucher Program lease-up by establishing payment standards that will enable families to rent throughout the jurisdiction.*
- *Maintain or increase the Housing Choice Voucher Program lease-up by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.*
- *Maintain or increase the Housing Choice Voucher Program lease-up rates by effectively screening HCV applicants to increase owner acceptance of program.*
- *Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.*

*PHA shall increase the number of affordable units available to the PHA within its current resources by:*

- *Leverage affordable housing resources in the community through the creation of mixed-finance housing.*
- *Pursue housing resources other than public housing or Housing Choice Voucher tenant based assistance.*

**b. Need: Specific Family Types: Families at or below 30% of median**

*PHA shall target available assistance to families at or below 30% of AMI by:*

- *Exceed HUD federal targeting requirements for families at or below 30% of AMI in the tenant-based Housing Choice Voucher assistance.*
- *Adopt rent policies to support and encourage work.*

**c. Need: Specific Family Types: Families at or below 50% of median**

*PHA shall target available assistance to families at or below 50% of AMI by:*

- *Adopt rent policies to support and encourage work.*

**d. Need: Specific Family Types: Elderly**

*PHA shall target available assistance to the elderly by:*

- *Seek designation of public housing for the elderly*
- *Apply for special-purpose vouchers targeted to the elderly, should they become available.*
- *Garner resources to build additional affordable housing units for the elderly*

**e. Need: Specific Family Types: Families with Disabilities**

- *Apply for special-purpose vouchers targeted to families with disabilities, should they become available.*

- *Affirmatively market to local non-profit agencies that assist families with disabilities*
- *Seek housing development funds for the construction of units designated to house families with disabilities.*

**f. Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

*PHA will increase awareness of PHA resources among families of races and ethnicities with disproportionate needs by:*

- *Affirmatively market to races/ethnicities shown to have disproportionate housing needs*

*PHA will conduct activities to affirmatively further fair housing by:*

- *Counsel Housing Choice Voucher participates as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.*
- *Market the Housing Choice Voucher Program to owners outside areas of poverty/minority concentration.*

**g. Reason for selecting Strategies**

- *Funding constraints*
- *Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA*
- *Influence of the housing market on PHA programs*
- *Community priorities regarding housing assistance*
- *Results of consultation with local government*
- *Results of consultation with residents and the Resident Advisory Board*
- *Results of consultation with advocacy groups*

In addition, Greenville is facing a level of growth that is unprecedented in our lifetime. There are many positive aspects of our city's growth and success, however, the most challenging unintended consequence of this growth is the pressure it creates on our affordable and workforce housing supply. This pressure can leave long-time residents and citizens vital to our local workforce without suitable options for housing.

The City worked over six months in 2016 with a 25-member steering committee (*to include representation from the Housing Authority of the City of Greenville*) to develop a strategy and offer recommendations to aid in the creation and retention of affordable housing options. The report was completed and presented to City Council on November 28, 2016. Included in the report were two recommendations: (1) the active preservation of existing units that are already affordable as well as the production of new units and (2) the acquisition of property to support the production of new affordable housing. The plan further recommended the creation of a Housing Trust Fund, a non-profit 501(c)(3) organization, to receive contributions and distribute funding according to established guidelines established.

On January 9, 2017, City Council adopted the Balancing Prosperity and Housing Affordability in Greenville report and appropriated \$2 million toward the implementation of the recommendations made in the report. The report also recommended that philanthropy, corporate and other charitable organizations leverage the City's contribution with an investment of \$1 million. A 13-member working group is now leading the development of a housing trust fund by December, 2017, and is evaluating broader issues that affect housing affordability in the City. Greenville County has since begun its own study to develop an affordable housing strategy, modeled along the same lines as the City's study, which will help address community-wide affordable housing issues in the future.

## II. DECONTRATION & OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION AND ADMISSIONS

### PUBLIC HOUSING

#### a. Eligibility:

##### Equal Access

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
  - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - (ii) An elderly family;
  - (iii) A near-elderly family
  - (iv) A disabled family;
  - (v) A displaced family;
  - (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

The Housing Authority of the City of Greenville verifies eligibility for admission to public housing when vacancies in its existent housing stock becomes available for leasing.

#### **The PHA uses the following non-income screening factors to establish eligibility for admissions to public housing:**

- *Criminal or Drug-related activity*
- *Rental history (previous)*

#### **The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:**



- *Local law enforcement agencies*
- *State law enforcement agencies*
- *FBI criminal records from the FBI (either directory or through the NCIC-authorized source)*

**b. Preferences:**

*The PHA does not plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of the median area income.*

**It is the policy of the PHA that transfers will take precedence over new admissions in the following circumstances:**

- *Emergencies*
- *Over-housed*
- *Under-housed*
- *Administrative reasons determined by the PHA*

**c. Maintaining the Waiting List:**

*The Housing Authority of the City of Greenville maintains a site based waiting list. Waiting list announcements will specify the process for applying for admission to each property. The authority requires all applicants to use an on-line application portal. Individuals needing assistance to complete the on-line application are provided accommodations.*

*The Housing Authority of the City of Greenville operates 6 site based waiting lists for public housing applicants. Current public housing waiting list are as following:*

- Garden Apartments – 88 units*
- \*Manor at West Greenville – 3 units*
- \*Harbor at West Greenville – 12 units*
- \*Evergreen Place – 75 units*
- \*Nicholtown Green - 38 units*
- \*Clark Ridge Commons – 27 units*

*\*LIHTC Mixed Financed... Also include waiting list for LIHTC, Project Based Voucher and other types of units.*

*Applicants may be on 6 waiting lists.*

*Interested persons can obtain information about and sign up to be on the site-based waiting list at the following location: <https://www.tgha.net/apply-for-housing>*

**d. Occupancy:**

**Applicants and residents may use the following references materials to obtain information about the rules of occupancy for public housing:**

- *The PHA resident lease*
- *The PHA’s Admissions for Continued Occupancy*
- *PHA briefing seminars or written materials*

**Residents must notify the PHA of changes in family composition:**



- *At an annual reexamination and lease renewal*
- *Anytime family composition changes*
- *At family request for revision*

**e. Deconcentration and Income Mixing:**

**The PHA has performed its annual deconcentration and income mixing analysis to determine if the PHA has any general occupancy public housing developments covered by the deconcentration rule. The analysis results are as follows:**

The PHA does not have any general occupancy public housing developments covered by the deconcentration rule.

**HOUSING CHOICE VOUCHER**

**a. Eligibility**

*Equal Access*

The term “family” includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person or any other single person; or
- (2) A group of persons residing together and such group includes, but is not limited to:
  - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - (ii) An elderly family;
  - (iii) A near-elderly family
  - (iv) A disabled family;
  - (v) A displaced family;
  - (vi) The remaining member of a tenant family.

Disabled family means a family whose head (including co-head), spouse or sole member is a person with a disability.

Elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 62 years of age.

Near elderly family means a family whose head (including co-head), spouse or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62.

Sexual orientation means homosexuality, heterosexuality or bisexuality.

Gender identity means actual or perceived gender-related characteristics.

**The PHA conducts screening to the extent of:**

- *Criminal or drug-related activity only to the extent required by law or regulation*

- *Criminal or drug-related activity, more extensively than required by law or regulation*

**The Housing Authority requests criminal records from the following enforcement agencies for screening purposes:**

- *Local law enforcement agencies*
- *State law enforcement agencies*
- *FBI criminal records from the FBI (either directory or through the NCIC-authorized source)*

**b. Waiting List**

The Housing Authority of the City of Greenville's waiting list for the Section 8 Housing Choice Voucher tenant-based assistance is not merged with other program waiting list.

Interested persons may apply for admissions to Section 8 Housing Choice Voucher tenant-based assistance via the on-line web at <https://www.tgha.net/apply-for-housing>.

**c. Search Time**

The PHA does give extensions on standard 60-day period to search for a unit under the following circumstances:

- Extensions will be granted only to applicants if the family provides a written document record to PHA indicating property owners contacted, units visited and the reasons why these units were unacceptable. Extensions will be granted for 30 additional days.

**d. Preferences**

The PHA does not plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the Section 8 Housing Choice Voucher Program to families at or below 30% of the median area income.

The PHA added "Re-Entry Referral" to their preferences.

Among applicants on the waiting list with equal preference status, applicants are selected by date and time of application.

In relationship of preferences to income targeting requirements, the pool of applicant families ensure that the PHA will meet income targeting requirements.

**e. Special Purpose Housing Choice Voucher Programs**

**The policies governing eligibility, selection and admissions to any special-purpose Section 8 Housing Choice Voucher Program administered by the PHA are contained in the following documents or other reference materials:**

- *The Section 8 Housing Choice Voucher Program Administrative Plan*
- *Briefing sessions and written materials*
- *Agency website and social media*

**The PHA announces the availability of any special-purpose Section 8 HCV Program to the public through:**

- *Through published notices*
- *Agency website and social media*

### III. FINANCIAL RESOURCES

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2018 grants)</b>		
a) Public Housing Operating Fund	\$180,000	
b) Public Housing Capital Fund	\$250,000	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant Based Assistance	\$19,419,569	
f) Resident Opportunity & Self-Sufficiency Grants	\$246,000	
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (List below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
2016 CFP 501-17	\$9,978	Public Housing Capital Improvements
2017 CFP 501-18	\$772,068	Public Housing Capital Improvements
<b>3. Public Housing Dwelling Rental Income</b>	\$20,000	Public Housing Operations
<b>4. Other income (list below)</b>		
Public Housing – Other Tenant Charges (Maintenance)	\$38,160	Public Housing Operations
HCV Administrative Fees	\$744,786	Other
HCV Other Income (Fraud Recovery)	\$4,555	Other
<b>5. Non-Federal Sources (list below)</b>		
COCC Management, Bookkeeping & Asset Mgt. Fees	\$419,038	COCC
COCC Other Income (Rental Income)	\$27,445	COCC
Business Activities – Developer Fees	\$63,314	Other
Business Activities – Property Management Fees	\$22,625	Other
Misc. Other Income	\$32,205	Other
<b>TOTAL RESOURCES</b>	<b>\$22,199,743</b>	

### IV. RENT DETERMINATION

## **PUBLIC HOUSING**

### **Income Based Rent Policies:**

#### **a. Use of discretionary policies:**

*The PHA will employ discretionary rent-setting policies for income based rent in public housing.*

#### **b. Rents set at less than 30% of the adjusted income:**

*The PHA does not plan to charge rents at a fixed amount of percentage less than 30% of the adjusted income.*

#### **c. Discretionary deductions and/or exclusion policy:**

*The PHA does plan to employ discretionary (optional) deductions and/or exclusions policy.*

#### **d. Rent Re-determinations:**

*Between annual income reexaminations, the tenant is required to report changes in income or family composition to the PHA such that the changes result in an adjustment to rent as follows:*

- *At any time family composition changes*
- *At any time income changes*

### **Flat Rents:**

**The PHA used the following sources of information in setting the market-based flat rents to establish comparability.**

- *Guidelines found in the 2105 Appropriations Act (PIH Notice 2015-13) in determining the Public Housing Flat Rent schedule. PHAs will establish a flat rent for each public housing unit that is:
  - 1) *No less than 80% of the applicable Fair Market Rent (FMR); or*
  - 2) *No less than 80% of an applicable small area FMR (SAFMR) or unadjusted rent, if applicable, as determined by HUD, or any successor determination, that more accurately reflects local market conditions and is based on an applicable market area that is geographically smaller than the applicable market area. If HUD has not determined an applicable SAFMR or unadjusted rent,*
  - 3) *Established based on an exception from HUD.**

## **SECTION 8 HOUSING CHOICE VOUCHER**

### **Payment Standards:**

**The PHA's payment standard is:**

- **Above 100% but at or below 110% of FMR**

**If the payment standard is higher than FMR, why has the PHA chosen this level?**

- *FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area*
- *To increase housing options for families*

**The PHA reevaluates the payment standards for adequacy annually and considers the following factors in its assessment of the adequacy:**

- Success rates of assisted families
- Rent burdens of assisted families

**V. VIOLENCE AGAINST WOMEN ACT (VAWA)**  
*(See attachment sc004c01 – Updates and Progress for VAWA)*

To protect the rights of victims of domestic violence, dating violence, and stalking to secure and maintain housing without being victimized a second time by being denied housing or losing housing because of the criminally violent acts perpetrated against them.

- Ensure that all applicants and participants of the Housing Authority know of their rights under the VAWA
- Implement VAWA as victims come forward to claim their rights
- Educate participating landlords to assist them to protect the rights of victims and to avoid evictions where the victim can certify they qualify for protection
- Link victims with resources in the community that can assist them with services
- Work with the Domestic Violence Shelter to develop housing options for victims of domestic violence
- Policies prescribed in the Public Housing Admissions for Continued Occupancy and Section 8 HCV Program Administrative Plan will ensure the following:
  - ✓ PHA will not knowingly deny assistance to otherwise eligible applicants simply because they have been victims of domestic violence, dating violence, sexual assault or stalking
  - ✓ PHA will not knowingly terminate the assistance of otherwise compliant persons simply because they are victims of domestic violence, dating violence, sexual assault or stalking
  - ✓ PHA will educate applicants and participants of their rights under VAWA
  - ✓ PHA will work to educate landlords about VAWA and the rights of victims under the act and to work with the landlord and the victims to protect the housing assistance of victims and their families

**VI. SIGNIFICANT AMENDMENT/MODIFICATION**

- Any changes to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency\* work items (items not included in the latest approved Capital Fund Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds (if applicable) under the Capital Fund Program; and
- Any change with regard to *a proposed* demolition, disposition, designation of housing, homeownership, *Capital Fund Financing, development, mixed financing* or conversion activities.

*An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements since such changes are not considered significant.*

*This criteria does not supersede the requirements of 2 CFR Part 200 (Administrative Requirements for Grants and Cooperative Agreements), as well as federal, state and local regulations or statutes.*

*Any future issuance of HUD guidelines or additional regulations shall take precedence over the above criteria.*

*\*Emergency – means physical work items of an emergency nature, posing an immediate threat to the health and safety of residents or staff, which must be completed within one year of capital grant funding. Management improvements are not eligible as emergency work.*

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

- a. 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;
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD conversion.

**B.2 New Activities.**

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

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

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

**I. DEMOLITION/DISPOSITION ACTIVITY DESCRIPTION**

The PHA intends to dispose of various properties through transfer to other entities as follows:

PROPERTY	DISPOSITION STRATEGY
Heritage (remaining land of JJT HOPE IV site)	Development of LIHTC in lieu of mixed finance elderly only project. Development partner has been select. <i>Partially developed Heritage at Sliding Rock, 60 unit 9% LIHTC/PBV development, 3 acres remaining.</i>
Former Chamlee Site	Dispose of the site at fair market value and utilize the sales proceeds towards development other affordable housing projects.
Scott Towers site	Development of mixed finance project(s); elderly and multi-family.
Scattered Site vacant parcels	Construction of single family rental and for sale units <i>This has been completed.</i>

Evergreen (3-acre parcel)	Sale or donation
Arcadia Hills (16 lots)	Construction of single family rental or for sale units.
Arcadia (12-acre parcel)	Sell at fair market value
Brookhaven (vacant 3.53 – acre parcel)	Development of LIHTC in lieu of mixed finance project(s); elderly; <i>This has been completed. Manor at Sliding Rock, a 55 unit Mixed Finance development with 3 Public Housing &amp; 52 PBV units.</i>
Brookhaven Apartments	Development of mixed finance project(s); multi-family; <i>This has been completed. Harbor at West Greenville, a 57 unit Mixed Finance development with 12 Public Housing &amp; 45 PBV units.</i>
Westview Apartments	Development of mixed finance project(s); elderly and multi-family; <i>This has been completed. Gallery at West Greenville, a 66 unit Mixed Finance development with 54 PBV units.</i>
Brookhaven (8.823 parcels)	Development of mixed finance project(s); multi-family and portions designated for sale or donation of land for public good. <i>This has been completed.</i>

\*The housing authority will evaluate disposition of such property where it may not be in its best interest to solicit bids but sell to local municipalities for public good.

**Scattered Sites Single Family Homes** – A detailed architect and engineering analysis of the condition of the 129 scattered units was completed. The analysis determined that 20 scattered site units were not viable for rehabilitation and thus were disposed of via public bid. The remaining 109 underwent substantial rehabilitation and conversion to the Rental Assistance Demonstration Program.

## II. CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED ASSISTANCE UNDER RAD DESCRIPTION

The PHA intends to convert all public housing to project based voucher under the Rental Assistance Demonstration (RAD) Program as follows:

PROPERTY	TYPE	NUMBER OF PUBLIC HOUSING UNITS	RAD REPOSITIONING STRATEGY
Charleston Place	Mixed Finance	20	Convert “as is”
Evergreen Place	Mixed Finance	75	Convert “as is”
Forest View	Mixed Finance	29	Convert “as is” <i>Completed</i>
Nicholtown Place	Mixed Finance	38	Convert “as is”
Clark Street Apartments	Mixed Finance	27	Convert “as is”
Ridgeway Apartments	Public Housing – Elderly/Disabled	8	Convert “as is” <i>Completed</i>
Scattered Sites	Public Housing – Elderly/Disabled	129	Demo/Rehab/Dispo – Completed: <i>Converted 109 units. Disposed of 20 completed 07/17/2017.</i>



Arcadia Hills	Public Housing – Elderly/Disabled	44	Convert “as is” <i>Completed</i>
Garden Apartments	Public Housing – Elderly/Disabled	80	Demo/Rehab/Dispo
	<b>TOTAL</b>	<b>474</b>	

**III. PROJECT BASED VOUCHERS DESCRIPTION**

The housing authority currently operates a project-based voucher (PBV) program and plans to continue working with community partners to identify specific target populations to be served through further project-basing of vouchers.

As outlined under Chapter 23 section 23.6 of TGHA’s Housing Choice Voucher Program Administrative Plan TGHA awarded 159 additional PBV units to Heritage at Sliding Rock (60 PBV units), Harbor at West Greenville (45 PBV units) and Gallery at West Greenville (54 PBV).

The agency intends to issue a RFP in the coming year to expand housing opportunities. TGHA may also consider applications outside the RFP Process consistent with Chapter 23 of the Administrative Plan. TGHA has tentatively determined that up to 200 additional vouchers could be project-based in the Plan year.

**IV. UNITS WITH APPROVED VACANCIES FOR MODERNIZATION DESCRIPTION**

The PHA has submitted its HUD Operating Subsidy calculation subsidy form HUD 52723 that includes units with approved vacancies for modernization, and has supporting documentation for such units that may be found in approved Capital Funds Annual Statement/Five-Year Action Plans.

**B.3 Progress Report.**

Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan. (*See attachment sc004c01 – Progress Statements*)

**PHA GOAL #1: REPOSITION THE PUBLIC HOUSING PORTFOLIO**

The PHA established the following objectives to strive in meeting goal #1:

- To lesson our dependence on federal funding we will continue to use the successes of the federal Mixed Finance program and the Rental Assistance Demonstration program.

**PHA GOAL #2: OPERATIONAL EFFECTIVENESS**

The PHA established the following objectives to strive in meeting goal #2:

- We will continue to seek new business systems and improve existing work processes through an emphasis of technological innovations designed to improve customer service, enhance communications and reduce administrative burden and intensity of paperwork

- Upgrade antiquated communications infrastructure to include computer hardware/software, phone system, network, etc.
- Secure paperless workflow technology to increase operational efficiency
  - ⇒ Continue implementation of paperless system in the Section 8 HCV Department and Low Rent Public Housing Department
  - ⇒ Implement electronic signatures that comply with regulations, expedite business processes, and reduce operational costs
- Update the agencies website and link it to a web portal that has access the following portals:
  - ⇒ Landlord Portal for the Section 8 HCV Program
  - ⇒ Tenant Portal for Low Rent Public Housing Residents
  - ⇒ Tenant Portal for Section 8 HCV Program Participants
  - ⇒ Applicant Portal for both programs for applicants
- Create a point of purchase system for goods and services and eliminate/reduce on site inventory
- Secure office location for scattered site units

### **PHA GOAL #3: ENTREPRENEURIALISM**

The PHA established the following objectives to strive in meeting goal #3

- Substantially through diversification:
  - ⇒ Maximize use of resources
  - ⇒ Partnerships
- Sound business practices:
  - ⇒ Superior property management
  - ⇒ Superior non-profit management
  - ⇒ Superior administration
  - ⇒ Superior public management

### **PHA GOAL #4: MARKETING**

The PHA established the following objectives to strive in meeting goal #4

- Strategically communicate PHA's successes, initiatives and capabilities to local leaders, businesses, stakeholders and partners in a an effort to enhance the awareness of PHA's capabilities and contributions
- Create marketing material to reflect PHA's new corporate brand (brochures, business cards, etc.,)
- Increase PHA's internet presence to communicate with our partners and customers (link website to business portals for vendors, landlords, tenants and applicants)
- Effectively utilize social media (twitter LinkedIn, Facebook, etc.) to market and enhance PHA's brand
- Host and/or ensure an active presence in housing related events (April – Fair Housing Month, June – Homeownership Month)
- Publish an annual report, highlighting the agencies successes and initiatives

**PHA GOAL #5: RESIDENT STRATEGIES**

The PHA established the following objectives to strive in meeting goal #5

- Maintain Arcadia Hills and other identified communities as stabilized homeownership communities
- Expand homeownership opportunities through the sale of 15 units
- Expand homeownership opportunities through the Section 8 Homeownership Program
- Partner in an active advocacy role with local schools and colleges to facilitate access to educational opportunities for tenants
- Ensure compliance with Section 3 in ensuring the greatest extend possible, job training, employment, and contract opportunities are made available to low or very low-income residents in connection with projects and activities in the neighborhoods where HUD funds are expended.
- Update the Low Rent Public Housing Lease Agreement
- Enhance safety and security efforts for PHA residents and the surrounding neighborhoods though active participation with the Crime Free Multi-Family Housing Program

**B.4 Most Recent Fiscal Year Audit.**

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

Y N

(b) If yes, please describe: *N/A*

**Other Document and/or Certification Requirements.**

**C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan**

Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

**C.2 Civil Rights Certification.**

Form 50077-ST-HCV-HP, *Certification of Compliance with PHA Plans and Related Regulations*, must be submitted by the PHA as an electronic attachment to the PHA Plan.

**C.3 Resident Advisory Board (RAB) Comments.**

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

Y N

(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. (*See attachment sc004a01*)

	<p><b>Resident Comments:</b> Residents of the Manor at West Greenville requested to have card readers placed on side doors so to access from outside in. Currently the access only allows the resident to access to exterior from inside of the building.</p> <p><b>TGHA Response:</b> Access readers will be installed at each door side door to allow residents access from exterior to inside of the building.</p>
<p><b>C.4</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>D</b></p>	<p><b>Statement of Capital Improvements.</b> Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p><b>D.1</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p><i>See HUD Form 50075.2 approved by HUD on <a href="#">10/16/2017</a></i></p>

**Attachment: sc004a01**  
**Housing Authority of the City of Greenville**  
**Resident Advisory Board Consultation Process and Comments – FYB 2019**

1. Resident notification of appointment to the Advisory Board

At the beginning of PHA Plan process, sent out letter to all residents/participants of opportunity to serve on Resident Advisory Board – **June 1, 2018**

2. Resident Advisory Board Selection

Selection made from resident/participant response – **June 17, 2018**

3. Meeting Organization

Schedule date to meet with Resident Advisory Board for input to PHA Plan – **June 30, 2018**

Notify Resident Advisory Board of scheduled meeting – **August 6, 2018**

Hold Resident Advisory Board meeting – **August 22, 2018**

4. Notification of Public Hearing

Schedule date for Public Hearing and place ad – **August 5, 2018**

Notify Resident Advisory Board – **September 10, 2018**

Hold Public Hearing Meeting – **September 20, 2018**

5. Documentation of resident recommendations and PHA’s response to recommendations

Questions/ Answers

**Resident Request:**

Residents of the Manor at West Greenville requested to have card readers placed on side doors so to access from outside in. Currently the access only always the resident to access to exterior from inside of the building.

**TGHA Response:**

Access readers will be installed at each door side door to allow residents access from exterior to inside of the building.

**Attachment: sc004b01**  
**Housing Authority of the City of Greenville**  
**Deconcentration Policy**

The Housing Authority has an aggressive development plan as detailed in Section B.2 below which will result in the preservation of existing affordable housing resources and construction of new affordable housing resources. In addition, the Housing Authority will closely monitor Housing Choice Voucher funding to maximize utilization, assisting the greatest number of households possible with available resources.

**1. Maximize the number of affordable units available to TGHA within its current resources by:**

- a. Updating and reviewing policies at least annually;
- b. Implement an occupancy strategy to reduce the turnaround time;
- c. Continue and enhance the preventative maintenance program;
- d. Maintain or increase HCVP lease-up rates by marketing the program to owners, particularly those outside the areas of minority and poverty concentration;
- e. Participate in the Consolidated Plan process to ensure coordination with broader community strategies;
- f. Monitor, purge and update waiting lists annually;
- g. Market waiting list opening to the greater Greenville community in an effort to promote deconcentration. Market TGHA programs and services to the community year-around.

**2. Increase the number of affordable housing units by:**

- a. Applying for Housing Choice Vouchers should they become available;
- b. Identifying funding sources and mixed finance opportunities to create additional affordable housing units to our community;
- c. Identifying opportunities through our community organizations and partner (Greenville Redevelopment Corporation)

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

**4. See elderly designation for Garden Apartments;**

- a. Apply for special purpose vouchers targeted to the elderly should they become available;
- b. Apply for vouchers for Families with Disabilities should they become available;
- c. Apply for vouchers for Veterans (VASH) should they become available.

**5. Create and/or maintain public/private partnerships:**

- a. City of Greenville
- b. Local universities and community colleges
- c. Local business community
- d. Targeted Solutions
- e. Workforce Development
- f. Habitat for Humanity
- g. Greenville Redevelopment Corporation
- h. Greenville County Redevelopment Corporation

**Attachment: sc004c01**  
**Housing Authority of the City of Greenville**

**Progress Statements for Goals/Objectives**  
**Including Updates and Progress for VAWA**