

Charlottesville Redevelopment & Housing Authority

PHA Plan  
Annual Agency Plan for Fiscal Year 2023- 2024



Approved December 8, 2022

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<b>Annual PHA Plan</b> <b><i>(Standard PHAs and Troubled PHAs)</i></b>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

**Definitions.**

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

<b>A.</b>	<b>PHA Information.</b>																																
A.1	<p>PHA Name: <u>Charlottesville Redevelopment &amp; Housing Authority</u>      PHA Code: <u>VA016</u></p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA    <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2023</u></p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>331</u>    Number of Housing Choice Vouchers (HCVs) <u>635</u>    Total Combined Units/Vouchers <u>966</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission      <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table><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><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></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.1	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <table border="0"> <tr> <td>Y</td> <td>N</td> <td></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Statement of Housing Needs and Strategy for Addressing Housing Needs</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Financial Resources.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Rent Determination.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Operation and Management.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Grievance Procedures.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Homeownership Programs.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Community Service and Self-Sufficiency Programs.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Safety and Crime Prevention.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Pet Policy.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Asset Management.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Substantial Deviation.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Significant Amendment/Modification</td> </tr> </table> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p><input checked="" type="checkbox"/> Rent Determination. The CRHA may be adjusting this if required by implementation of the final rule for implementation of Housing Opportunity Through Modernization Act's (HOTMA) public housing income limit requirements.</p> <p><input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs. The CRHA has submitted an updated Family Self Sufficiency Action Plan to HUD see attachment C1. The CRHA has worked with residents and the Public Housing Association of Residents (PHAR) to draft a Maintenance Plan attachment C2 and a Safety Plan attachment C3.</p> <p><input checked="" type="checkbox"/> Pet Policy. Pet policy being updated to match most recent Virginia Landlord Tenant Act regulations.</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p> <p style="text-align: center;"><b>Deconcentration of Poverty and Income Mixing Policy</b></p> <p>The PHA's admission policy is designed to provide for de-concentration of poverty and income mixing by bringing higher income tenants into lower income communities and lower income tenants into higher income communities. Gross annual income is used for income limits and admission and to review income-mix among various sites. Skipping of a family on the waiting list specifically to reach another family with a lower or higher income is permitted to reach targeted thresholds.</p> <p>The PHA will gather data and analyze, at lease annually, the tenant characteristics of its public housing stock, including information regarding tenant incomes, to assist in the PHA's de- concentration efforts.</p> <p>The PHA will use the tenant income information in an assessment of its public housing developments to determine the appropriate designation to be assigned to the development for the purpose of assisting the PHA in its de-concentration goals.</p> <p>If the PHA's annual review of tenant incomes indicates that there has been a significant change in the tenant income characteristics of a particular development, the PHA will evaluate the changes to determine whether, based on the PHA methodology of choice, the development needs to be re- designated as a higher or lower income project or whether the PHA has met the de-concentration goals and the development needs no particular designation.</p> <p><b>De-concentration and Income Mixing Goals</b></p> <p>The PHA strives through its various economic self sufficiency and educational programs to achieve de-concentration of extremely poor families and any one site and income-mixing throughout its developments.</p> <p>The PHA's income-mixing goal is a long-range goal which recognizes that the residents of its developments designated for the elderly maybe on fixed incomes which are not likely to be altered by HUD's income mixing goals. The PHA will use its annual analysis of its public housing stock and tenant incomes to provide benchmarks for the PHA.</p>	Y	N		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Statement of Housing Needs and Strategy for Addressing Housing Needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Financial Resources.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Rent Determination.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Operation and Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Grievance Procedures.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Homeownership Programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Community Service and Self-Sufficiency Programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety and Crime Prevention.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pet Policy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asset Management.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification
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	<p>The PHA will target at least 40 percent of new admissions to public housing in each fiscal year to “extremely low-income families”.</p> <p>Apart from the elderly high-rise development, CRHA’s incomes for all projects fall within similar ranges. Where there is significant disparity in the percentages of very low-income and other extremely low-income families at the various developments, the size of the units, the presence of larger, multiple-income families appear to account for the disparity.</p> <p>The PHA will strive to achieve de-concentration of poverty and income-mixing through active pursuit of economic development opportunities for families which are designed to increase the total number of lower income families into higher income brackets.</p>																																							
<p><b>B.2</b></p>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <table border="0"> <tr> <td>Y</td> <td>N</td> <td></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Hope VI or Choice Neighborhoods.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Mixed Finance Modernization or Development.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Demolition and/or Disposition.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Designated Housing for Elderly and/or Disabled Families.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Conversion of Public Housing to Tenant-Based Assistance.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Occupancy by Over-Income Families.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Occupancy by Police Officers.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Non-Smoking Policies.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Project-Based Vouchers.</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Units with Approved Vacancies for Modernization.</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</td> </tr> </table> <p>(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.</p> <p><input checked="" type="checkbox"/> <b>Mixed Finance Modernization or Development.</b> <b>1)</b> A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and <b>2)</b> A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at:  <a href="https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4">https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4</a></p> <ul style="list-style-type: none"> <li>• The CRHA anticipates submitting a Mixed Finance Development application for the Sixth Street (AMP 3) development. We anticipate developing between 40-45 units on the site with a mixture of 1–3-bedroom units. The CRHA, the resident planners that live on the site and the Public Housing Association of Residents (PHAR) are currently planning the redevelopment. CRHA anticipates submitting the Mixed-Finance and Demolition/ Disposition application in mid-July, 2023.</li> <li>• The CRHA plans to build upon partnerships with the RAB/RC and other stakeholders to continue the implementation of public housing redevelopment. In the current Fiscal Year, CRHA anticipates that these activities will include redevelopment planning, community engagement, environmental study/ survey, Demolition/ Disposition submittal and approval, site plan development and approval, permitting of construction activities, construction and related activities. To enhance its redevelopment prospects, CRHA will also consider pursuing acquisition of new properties for its portfolio if any such opportunities arise. The unit breakout in the application is below.</li> </ul>	Y	N		<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hope VI or Choice Neighborhoods.	<input checked="" type="checkbox"/>	<input 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"/>	Designated Housing for Elderly and/or Disabled Families.	<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 Rental Assistance or Project-Based Vouchers under RAD.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Occupancy by Over-Income Families.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Occupancy by Police Officers.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Non-Smoking Policies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Project-Based Vouchers.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Units with Approved Vacancies for Modernization.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
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	Unit Type (Select One)	Rent Target (Select One)	Number of Units	# of Units 504 compliance	Net Rentable Square Feet	Monthly Rent Per Unit	Total Monthly Rent
Mix 1	1 BR - 1 Bath	50% AMI	3		645.00	\$500.00	\$1,500
Mix 2	1 BR - 1 Bath	50% AMI	1		588.00	\$500.00	\$500
Mix 3	1 BR - 1 Bath	50% AMI	3		640.00	\$500.00	\$1,500
Mix 4	1 BR - 1 Bath	60% AMI	1		635.00	\$775.00	\$775
Mix 5	1 BR - 1 Bath	60% AMI	1	1	637.00	\$775.00	\$775
Mix 6	2 BR - 2 Bath	40% AMI	3		964.00	\$575.00	\$1,725
Mix 7	2 BR - 2 Bath	40% AMI	2	2	1209.00	\$575.00	\$1,150
Mix 8	2 BR - 2 Bath	50% AMI	1	1	1209.00	\$575.00	\$575
Mix 9	2 BR - 2 Bath	50% AMI	6		995.00	\$750.00	\$4,500
Mix 10	2 BR - 2 Bath	50% AMI	5		1083.00	\$750.00	\$3,750
Mix 11	2 BR - 2 Bath	60% AMI	9		1083.00	\$800.00	\$7,200
Mix 12	3 BR - 2 Bath	60% AMI	10	1	1174.00	\$1,732.00	\$17,320
Mix 13	3 BR - 2 Bath	60% AMI	2		1174.00	\$650.00	\$1,300
Mix 14							\$0
Mix 15							\$0
Mix 16							\$0

TC-Application - Sixth Street.v10-47 units.xlsx

Unit Details, pr

☒ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

- Consistent with the recommendation provided by CRHA, by the RAB/RC, in the current Fiscal Year, CRHA intends to explore the demolition and redevelopment of other Westhaven (AMP1).
- The CRHA is currently working with the Resident Planners and the Public Housing Association of Residents (PHAR) to redevelop the Sixth Street (AMP 3) community located at 715 Sixth Street SE Charlottesville VA 22902. The property currently has twenty-five 3-bedroom style townhouse units. The property contains 4 dwelling unit buildings and 1 non-dwelling unit building that is used as a community center and management office. The CRHA HCV department is the current leaseholder of the Community Center on the Sixth Street property. CRHA received an allocation of Low-Income Housing Tax Credit (LIHTC) application in July 2022. We are preparing to submit a Demolition and Disposition application for the Sixth Street Community (AMP 3).
- The CRHA currently has a approved Demolition and Disposition application for the South First Street (AMP 3) Community located between 900- 1000 South First Street Charlottesville, VA 22902. The current plan is to demolish the 58 public units located on the site. The current site has one 1-bedroom unit, seventeen 2- bedroom units, fourteen 3-bedroom units, eighteen 4-bedroom units and eight 5-bedroom units. Of the 58 units 3 are UFAS Mobility Units (1-1bedroom unit, 1-2bedroom unit and 1-4bedroom unit).
- The CRHA has approved Disposition applications for a vacant parcel of land in AMP 3 and a 105-unit Senior and Disabled development located at 500 South First Street Charlottesville VA 22902.

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

- The CRHA currently operates a PBV program of its Voucher program budget authority to provide housing for the homeless. We plan to expand the families we assist through the PBV program for families, senior's and the disabled at the new Mixed Financed developments at South First Street Phase 1 (Development Number VA16000010), Crescent Halls Phase 1 (Development Number VA16000009), South First Street Phase 2 (Development VA16000003) and Sixth Street (Development VA16000003). The CRHA will reduce or discontinue the issuance of new tenant-based vouchers so that the necessary PBV assistance is made available through attrition. The use of PBV's is consistent with CRHA's goal to explore, and where appropriate, convert Housing Choice Vouchers to Project Based Vouchers to support

	<p>CRHA's redevelopment plans and objectives. The CRHA will also project base TPV's from replacement public housing units.</p> <ul style="list-style-type: none"> <li>In the current Fiscal Year, CRHA will work with the RAB/RC and other community stakeholders to continue determining the need for and designating for use certain project-based vouchers to assist in the redevelopment of CRHA's extremely- low income and very low-income housing portfolio.</li> </ul> <p><input checked="" type="checkbox"/> <b>Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.</b> Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; <b>2)</b> An analysis of the projects or buildings required to be converted; and <b>3)</b> A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <a href="http://www.hud.gov/offices/pih/centers/sac/conversion.cfm">http://www.hud.gov/offices/pih/centers/sac/conversion.cfm</a>. (24 CFR §903.7(j))</p> <ul style="list-style-type: none"> <li>Consistent with the recommendation provided by CRHA, by the RAB/RC, in the current Fiscal Year, CRHA intends to voluntarily convert 38 public housing units at South First Street Phase to PBV units <b>not using the RAD Program</b>. Through the Mixed Finance redevelopment of South First Street, we have determined it is most financially feasible for CRHA to redevelop the site with a mixture of project-based voucher, public housing units and non-subsidized tax credit units.</li> </ul>
B.3	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p style="text-align: center;"><u><b>CRHA 5 Year Plan Goals and Progress FY 2019- 2024</b></u></p> <p><b>Mission:</b> The Charlottesville Redevelopment and Housing Authority (CRHA) is resident-centered organization committed to excellence in providing affordable quality housing, revitalizing communities, and promoting upward mobility and self- sufficiency through partnerships in the public and private sectors.</p> <p><i>CRHA Progress in Meeting Mission: Ongoing. CRHA through new management has begun to modernize their approach to providing services. Agency will continue to work to meet their missions and fulfill the needs of the people we serve in a rapidly evolving and complex world.</i></p> <p><u><b>Public Housing Program Goals</b></u></p> <p><b>Goal 1. Provide quality, affordable housing</b></p> <p><b>A. In partnership with our Residents, Expand and Enhance Resident Engagement Opportunities</b></p> <ol style="list-style-type: none"> <li>Partner with residents as equal partners in success of neighborhoods. This includes inviting more resident involvement in maintenance and agency operations planning. <i>Progress: Ongoing. The CRHA has strived to hire more residents as opportunities become available in the agency. The CRHA board has appointed a member to partner with staff to hold weekly Maintenance committee meetings to hear feedback from residents. These meetings are primarily virtual during COVID-19 but then transition to rotating meetings at our sites. The Maintenance Committee meetings are attended by the Public Housing Association of Resident staff, residents, and CRHA management staff from the Housing, Maintenance and Central Office. CRHA participated with the Charlottesville Area Community Foundation Project Management Team (PMT)'s tri-party (City-CRHA-PHAR) collaboration which includes stipends for resident participants and assistance with hiring a Redevelopment Coordinator with funds provided by PMT.</i></li> <li>Work to provide community- wide internet access so that CRHA can better communicate with residents in social media and email <i>Progress: CRHA has executed an agreement with Ting to incorporate free or low-cost high- speed fiber internet at all CRHA sites, but starting with Crescent Halls and South First St. We are currently in communication with Ting on their fiberoptic installation plans for other communities in Charlottesville.</i></li> </ol> <p><b>B. In Partnership with our Residents, Improve Asset Management to increase CRHA's Financial Sustainability.</b> <i>Progress: CRHA has analyzed it's current contractual obligations to ensure all contracts are financially beneficial to the Agency. The CRHA has reinvested in the Maintenance Department to assist with turning the large number of vacancies in the CRHA portfolio. Due to this investment CRHA has been able to reduce its vacancy backlog to approximately 4 active vacant units. The CRHA has also worked to minimize TAR's Tenant Account Receivables by working with community stakeholders and the residents to connect them with resources that can assist them with paying their rent. CRHA staff is working with residents who are delinquent to assist them with executing a repayment agreement they can afford.</i></p> <ol style="list-style-type: none"> <li>Strive for HUD High Performer status through ongoing improvements and monitoring of key property</li> </ol>

	<p>management indicators.  <i>Progress: Management team is meeting regularly to ensure they keep on track towards PHAS goals.</i></p> <p>2. Provide ongoing staff training on performance and revised duties as it relates to increasing efficiency in rent collections, rent calculations, income verification, performance standards.  <i>Progress: Increased utilization of HUD industry training companies for these standards in the past calendar year and continued scheduling for Asset Management Team.</i></p> <p>3. Maintain a 98% utilization rate and reduce tenant account receivables to at or below HUD best practices guideline of 3% of tenant revenue.  <i>Progress: Ongoing. Rental Office staff are receiving additional training as we work towards this goal. The CRHA works with local Eviction Diversion programs that allow residents who are behind in rent to enter into an education budget and finance program while crafting and executing a repayment agreement.</i></p> <p>4. Concentrate efforts to improve lease enforcement and unit inspections.  <i>Progress: Ongoing. Opportunities are being created to do more resident training on CRHA policies. We have created a maintenance plan which incorporated a preventative maintenance plan and a housekeeping inspection procedure.</i></p> <p>5. Maximize efficiencies through technology including the Yardi software.  <i>Progress: Updating Yardi RentCAFÉ module to allow families to track work orders, process rental payments online, access rent statement/ ledger and check waitlist status on other programs.</i></p> <p>6. Strategic use of Capital funds.  <i>Progress: Ongoing. Management Team reviews budget on regular basis and agency has hired Redevelopment Coordinator. We are currently working on submitting 2019, 2020 and 2021 CFP budget revisions to ensure the funds are strategically used when addressing the sites that are not actively under redevelopment. CRHA staff held many meetings at different sites with residents to get feedback on the CFP budget.</i></p> <p>7. Provide ongoing staff training in customer service.</p> <p>C. In partnership with our residents, institute policies, procedures and practices that improve safety and security on all CRHA sites.  <i>Progress: The CRHA has enacted the Camera policy and has successfully deployed cameras to Sixth Street and Westhaven. We have budgeted CFP funds to install cameras at the other multifamily sites.</i></p> <p>1. Partner with the Charlottesville Police Department and other organizations to develop and implement strategies to reduce crime.  <i>Progress: The CRHA will continue to work with their partners at PHAR and residents on strategies to improve the safety of our neighborhoods and partnerships with the local police department.</i></p> <p>2. When appropriate, utilize technology to help improve safety and security on CRHA sites.  <i>Progress: The CRHA and PHAR are currently meeting with the Charlottesville Police Department to discuss safety issues and better coordinate. We plan to eventually expand the meeting to include residents so CPD can hear directly from the residents what they would like to see in their communities.</i></p> <p>D. In Partnership with our Residents, provide efficient, effective Property and Unit Maintenance.</p> <p>1. Educate residents and staff on pest eradication, particularly roaches and bedbugs.  <i>Progress: Ongoing. Looking at using video opportunities on website.</i></p> <p>2. Improve curb appeal of properties.  <i>Progress: CRHA has worked with a contractor and is currently working with an in-house team to assist with landscaping needs.</i></p> <p>3. Achieve a score of 80 or above on the HUD Real Estate Assessment Center (REAC) physical inspection of all public housing communities.  <i>Progress: We have hired additional staff and we are completing quarterly inspections of all public housing units. The maintenance department then address the deficiencies that have been identified.</i></p> <p>4. Respond to maintenance requests within 72 hours and complete all emergency requests within 24 hours.  <i>Progress: We continue to work to improve the efficiency of the maintenance department. We have hired a full-time work order clerk who enters and tracks the work orders until completion.</i></p> <p>5. Achieve a vacant unit turn time average of 15 days or better. Reduce turnover time for vacated public housing units by use of CRHA maintenance personnel, special teams/programs and/or outsourcing where appropriate.</p>
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*Progress: CRHA has tried several approaches including procuring repair contractors for our vacant units and setting up a turn team in maintenance. The most effective method thus far has been CRHA hiring turn team technicians to complete the vacant turns. Some of the units require minimal work but others are more substantial rehabilitations.*

6. Develop an active list of business that can be subcontracted for repairs requiring skilled technicians.

*Progress: Ongoing and hope to start adding some Section 3 businesses as our Section 3 program grows.*

7. Use technology, including the Yardi software, to track work order completions and other projects.

*Progress: We are using Yardi system to track work order system.*

8. Employ effective maintenance and management policies to minimize the number of public housing units off-line.

*Progress: Maintenance department has been rebuilt as we have hired more staff and continue to work on SOPs.*

9. Create online work order creation and tracking system for residents.

*Progress: Ongoing. Many improvements to YARDI entry have occurred this year with the Executive Director working with Finance and Housing.*

10. Explore partnership with residents to support the creation of a resident-owned maintenance company.

*Progress: Ongoing as Section 3 program continues to be developed.*

#### Voucher Program Goals:

##### E. Obtain "High Performer" rating for HCV Program

1. Maintain 95% or above reporting rate

*Progress: We are currently reporting at 100% and will continue to report at 95% or greater.*

2. Continued utilization of HUD forecasting tools to optimize voucher utilization.

*Progress: We are working with the HUD Field Office and our Fee Accountants to accurately capture our Utilization through VMS which translates to the Two-Year Forecasting Tool.*

3. Maximize efficiencies through technology including the Yardi software.

*Progress: We are in the process of updating Yardi to the latest version in order to implement Rent Cafe Resident and Applicant Portals.*

4. Process lease-ups within 100 days.

*Progress: Vouchers are valid for 90 days with the potential of an additional 60 days in extensions. Once a Request for Tenancy Approval is received the goal is to process all information within 15 days to allow for lease up will occur when the unit is available for move in.*

5. Process approvals and denials for tenancy approvals, new admissions and transfer moves within five days

*Progress: Approval or denial of Tenancy for moves will continue to be processed within 7 business days of all required documents being obtained.*

##### F. Continue to leverage private and/or other public funds to create additional housing opportunities.

1. Work with City of Charlottesville to maintain and possibly increase funding for the City funded housing vouchers.

*Progress: Partnership with the City of Charlottesville will continue for the CSRAP program.*

***\*\* This goal will be removed when the new five-year plan is drafted as these are not federal funds.***

2. Apply for additional HCV units should they become available.

*Progress: Addition Voucher Programs have been applied for and new opportunities will continue to be explored.*

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

*Progress: CRHA continues to apply for Mainstream Vouchers as they become available.. This program assist non-elderly participants where the head of household or a family member is disabled.*

4. Explore managing home ownership vouchers

*Progress: Homeownership program is part of Admin plan and will be part of discussions with redevelopment efforts.*

- G. Provide Professional, Courteous, Timely Customer Service

*Progress: Continued Customer Service training will be provided.*

- H. Create more locally available units through landlord recruitment, education and incentives.

*Progress: Landlord Briefing Sessions being held. A New Landlord incentive program has been initiated this year using special voucher allocation funds.*

Goal 2: Revitalize Communities, Especially CRHA Communities, in Charlottesville

Redevelopment and Renovation Goals:

- A. In Partnership with our Residents, Plan and execute total renovation of Crescent Halls (AMP 2).

*Progress: Crescent Halls renovation project has begun and will be completed in 2023.*

- B. In Partnership with our Residents, Renovate and/or modernize public housing units at Riverside Dr., Michie Dr., and Madison Ave. (possibly using low-income housing tax credits, if appropriate). Pursue selected demolition to create more public space, parking and to construct replacement units.

*Progress: A 5-year Capital Fund Plan was crafted with the support of the RAB, a resident survey, and resident meetings on the Parallel Track sites. The plan relies on exterior modernization, upgrades to common areas, and extensive interior modernization. Monthly meetings at the affected sites have been well attended and exterior upgrades to roofs, gutters, siding, insulation, windows, and entry doors are close to be under contract. We have partnered to bring new playground spaces to these sites.*

- C. In Partnership with our Residents, continue to assess and implement options to fully redevelop Crescent Halls, Avon/Levy Ave., Westhaven, South First St. and 6<sup>th</sup> St properties.

*Progress: Crescent Halls, South First Phase One and Two are in progress. Levy is going to temporarily become a maintenance location. Resident planning has begun at 6<sup>th</sup> Street and is being planned for Westhaven.*

- D. In Partnership with our Residents, pursue Demolition/Disposition of existing Public Housing properties in AMPS 1, 2, 3, and 4 (i.e.: Crescent Halls, South First St., Levy Ave., 6th St., Westhaven, Riverside Drive, Michie Drive, Madison Ave., and scattered site homes) to improve and increase the number of affordable housing units.

*Progress: Demo dispo has been submitted and approved for Crescent Halls and South First Street Phase One. A demo dispo has been submitted and approved for South First Street Phase Two. We will be beginning the demo/diso process for Sixth Street the final months of 2022.*

- E. Complete basic Environmental Surveys of CRHA properties.

*Progress: Environmental surveys have been completed for Crescent Halls and South First St. in conjunction with both redevelopment projects. Sustainability study is beginning this fiscal year and will look at all sites.*

- F. In Partnership with our Residents, Scope Rehabilitation and Redevelopment Projects that not only increase affordable housing in Charlottesville but that generate enough income to maintain these properties and provide for the long-term financial stability of the CRHA.

1. Develop necessary legal mechanisms needed to maximize funding for rehabilitation and redevelopment projects.

*Progress: LLCs will continue to be created to serve as redevelopment vehicles for projects.*

2. Operationalize a sister agency (instrumentality) that is a non-profit community development corporation.

*Progress: Charlottesville Community Development Corporation has been established as an instrumentality of CRHA to serve as Developer for upcoming redevelopment projects.*

3. Investigate and potentially use funding/redevelopment tools including LIHTC, mixed finance, Rental Assistance Demonstration funding, other HUD funding mechanisms, municipal bonds, grants, and private loans.

*Progress: CRHA is utilizing mixed- finance development for the Crescent Halls and South First St. redevelopment projects, with a mix of LIHTC funding, City bonds, grants & donations, private loans, etc. We do not envision utilizing RAD as a funding source for future projects.*

- G. Provide Enhanced relocation and new development services for the Elderly and Disabled

1. Explore, and if appropriate implement, designation of public housing for the elderly.

*Progress: Once fully renovated, Crescent Halls will serve as public housing and project-based HCV housing.*

2. Explore, and if appropriate apply for, special- purpose vouchers targeted to the elderly, should they become available

*Progress: CRHA has successfully applied for mainstream vouchers to increase housing opportunities for vulnerable populations*

**Goal 3: Promoting upward mobility and self-sufficiency**

- A. In Partnership with our Residents, Advance Resident Independence & Stability.**
- 1. Re-build the Family Self Sufficiency program in both Public Housing and HCV.**  
*Progress: The CRHA has revised it's FSS Action Plan and applied for HUD funding to run it's FSS program.*
  - 2. Continue to support the Nursing Clinics at Westhaven and Crescent Halls**  
*Progress: Ongoing. The Clinic at Crescent Halls is under to be completed in the beginning of 2023. CRHA staff sit on advisory committees for the clinics.*
  - 3. Provide or obtain partnerships to provide supportive services to increase lifestyle and economic independence for both the elderly and for families with disabled family members.**  
*Progress: Ongoing. Staff have been focusing on increasing communication and partnership opportunities with local programs through DSS and other agencies.*
  - 4. Explore, and if appropriate, implement a HUD Moving to Work program.**  
*Progress: To this date the agency has not seen support from this program from PHAR and may consider removing this goal as we focus instead on building our Section 3 program.*
  - 5. Provide or obtain partnerships to provide enhanced youth engagement/ youth activities.**  
*Progress: Ongoing. As sites are redeveloped staff and resident partners are focusing on programing opportunities in community spaces.*
  - 6. Provide or obtain partnerships to provide enhanced senior activities.**  
*Progress: Ongoing. Exploring ways to continue and enhance services. CRHA's Resident Services program has been meeting with the Crescent Halls Resident Association to plan for having a one-stop and Parks and Rec in Crescent Halls as it reopens.*
  - 7. In partnership with the Legal Aid Justice Center and HUD, draft and adopt policies that support practices in public housing designed to serve those who are re-entering society following periods of incarceration.**  
*Progress: Ongoing. The RAB continues to work with CRHA staff to review the Admin and ACOP policies.*
- B. In Partnership with our Residents, Develop a Section 3 oriented Economic Opportunities office**
- 1. Build a CRHA workforce development/ Economic Opportunity program**  
*Progress: CRHA has been building their Section 3 program under Resident Services and has utilized local grant funding to hire low-income people into career track positions in this department.*
  - 2. Provide or obtain partnerships to provide supportive services to improve recipients' employability.**  
*Progress: CRHA works with Piedmont Virginia Community College whereby the CRHA Section 3 program works closely with PVCC's Network2Work program to help Section 3 participants secure employment-related support services. CRHA is also a partner with several local agencies in the establishment of a new Financial Opportunity Center for Charlottesville. CRHA has been holding a one-stop shop at Westhaven and will be expanding to South 1<sup>st</sup> Street and Crescent Halls this coming year.*
  - 3. Provide or obtain partnerships to provide training and support for resident-owned businesses**  
*Progress: Currently the CRHA is working with UVA Occupational Services, Goodwill, Network to Work and several other community partners.*

**Goal 4. Agency Governance and Management**

- A. Annual Board Retreat**  
*Progress: Ongoing. The new Executive Director is working with the board as they have several new members.*
- B. New Board member orientation**  
*Progress: The CRHA attorney has held several trainings with the board of commissioners, and more will be scheduled.*
- C. Annual ACOP review and update**  
*Progress: Members of the CRHA management team continue to work with the RAB on an ACOP review.*
- D. Annual HCV Admin Plan review and update**  
*Progress: HCV Admin Plan will be continuously updated to include new PIH Notices and Federal Regulation changes*
- E. Review and Update By-laws**  
*Progress: Executive Director is working with board to assist with education and review of Bylaws.*
- F. Annual Review of personnel policies and procedures.**  
*Progress: Ongoing. Personnel Committee will be exploring redrafting the Personnel Policies over the next year.*
- G. With a transformational goal of becoming a Resident managed organization, develop and implement processes by which CRHA Residents are strategically recruited, employed, trained and mentored in the**



	<p>management of CRHA.  <i>Progress: Ongoing. CRHA continues to focus on hiring staff with lived experience in public housing and vouchers. Many of the CRHA staff are part of CRHA's Section 3 programs and able to utilize support services, trainings and referrals.</i></p> <p><b>CRHA Annual Plan Goals and Progress FY 2022- 2023</b>  See Section II A</p> <p><b>CRHA FY 2023- 2024 Annual Plan Goals</b>  See Section II B</p>
<b>B.4</b>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>Please see Attachment A</p>
<b>B.5</b>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>If yes, please describe: There were deficiencies in the rent reasonableness process, HCVP voucher annual recertification process, HCVP voucher annual Housing Quality Standards (HQS) inspection process and the Financial internal controls when closing out the public housing redevelopment which are all currently being addressed.</p>
<b>C.</b>	<b>Other Document and/or Certification Requirements.</b>
<b>C.1</b>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y   N  <input checked="" type="checkbox"/>   <input type="checkbox"/></p> <p>(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. Please see Section IV C and D</p>
<b>C.2</b>	<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. Please see attachment E</p>
<b>C.3</b>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>Please see attachment D</p>
<b>C.4</b>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y   N  <input type="checkbox"/>   <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>



C.5	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y    N    N/A  <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: The CRHA has been transitioning out of troubled status. They are now substandard physical and working on completing their Recovery Plan. Please see attachment B.</p>			
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>			
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="207 720 1412 978"> <tr> <td> <p><b>Fair Housing Goal:</b> 1. Increase access to information and resources on fair and affordable housing for CRHA program participants, staff and stakeholders.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Convey HUD data in understandable ways to the public.  b. Gather and share local information about fair housing education and training opportunities.  c. Work with city and TJPDC on AFFH assessment.</p> </td></tr> </table> <table border="1" data-bbox="207 1003 1412 1299"> <tr> <td> <p><b>Fair Housing Goal:</b> 2. Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Research and participate in programs available to assist CRHA and program participants in homeownership and rental.  b. Target opportunities to assess and acquire properties in high opportunity areas.  c. Improve conditions and increase opportunities in identified low opportunity area.</p> </td></tr> </table> <table border="1" data-bbox="207 1325 1412 1575"> <tr> <td> <p><b>Fair Housing Goal:</b> 3. Increase services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Increase support services available for low-income housing residents to increase wealth building opportunities.  b. Focus on improving access to transportation for low-income communities</p> </td></tr> </table>	<p><b>Fair Housing Goal:</b> 1. Increase access to information and resources on fair and affordable housing for CRHA program participants, staff and stakeholders.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Convey HUD data in understandable ways to the public.  b. Gather and share local information about fair housing education and training opportunities.  c. Work with city and TJPDC on AFFH assessment.</p>	<p><b>Fair Housing Goal:</b> 2. Prevent loss of existing affordable housing stock and increase supply of new affordable housing, especially in higher opportunity areas.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Research and participate in programs available to assist CRHA and program participants in homeownership and rental.  b. Target opportunities to assess and acquire properties in high opportunity areas.  c. Improve conditions and increase opportunities in identified low opportunity area.</p>	<p><b>Fair Housing Goal:</b> 3. Increase services for residents of publicly supported housing and maintain and improve the quality and management of publicly supported housing.</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>a. Increase support services available for low-income housing residents to increase wealth building opportunities.  b. Focus on improving access to transportation for low-income communities</p>
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## II. Annual Plan Goals and Progress

### A.

#### CRHA Annual Plan Goals and Progress FY 2022- 2023

Goals and Objectives	Progress Notes
<b>AGENCY WIDE GOALS</b>	
1. Continue to pursue funding to re-establish CRHA's FSS program following HUD "best practices" and guidelines. Report to the Commission at Board meetings. Engage the FSS program with a Financial Opportunity Center.	The CRHA has submitted an FSS Action Plan to HUD and applied for HUD FSS funding. The FOC has been invited to serve on the FSS Program Coordinating Committee (PCC).
2. Continue a process where CRHA will be responsible for producing an annual report with a summary of CRHA's financials.	The Executive Director is working with the Finance Director on coordinating this process.
3. Improve customer service skills of all who work with CRHA (including staff and contractors) to ensure professional dealings with Residents and Public.	Staff training including customer service skills will be a priority of our new HR Coordinator once the position is filled.
4. Support the goals and efforts of the Residents for Respectful Research.	Ongoing, the Deputy Executive Director serves on the RRR Advisory Committee.
5. Improve rent collections to improve financial viability. Reduce Tenant Accounts Receivable to less than 5%. Develop Eviction Prevention Program to assist participants in public housing with individual and family stabilization.	Since April 2022 the Housing Team in partnership with Resident Services has diligently worked to implement more consistent practices for delinquent rent notification by phone & serving multiple notices, prior to implementing court proceedings. We have counseled and referred families to local agencies as well as state agencies when funds are available. We will consistently use these practices moving forward to help decrease TAR & Eviction.
6. Continue to revamp our website, social media, calendar and communications plan. Explore partnerships with IT organizations and non-profits. Create methods to enable Recertifications to be done online. Implement method by which rental payments can be received on- line.	CRHA has renewed their IT support contract with Ricoh IT (formerly Mindshift) to provide infrastructure (Cloud Services & VOIP), licensing & user support. We are in the process of reviewing local contractors for Microsoft application support/user training. Yardi RentCafe will be expanded with the addition of our redeveloped properties. Initial staff training in the finance office occurred in August 2022, Additional training for finance & other targeted staff is planned over the next 6 months. A staff training plan will be developed for the use of currently available applications (MS Office apps including Sharepoint file management). Discussions regarding CRHA rebranding, including the website, social media and physical signage is on-going and will coincide with the redeveloped properties coming online
7. Quarterly "Report-out" on HCV and Public Housing waiting list status in such a manner that increases the public's understanding of wait list function and scope.	Housing Office is working diligently with Yardi to update functionality of Waitlist. Once completed we will be able to set up regular updates & purges. We will also be working on a process for conducting regular trainings for PHAR Reps & PH/HCV residents to educate them and increase their understanding of the waitlist, function & scope.
8. Continue to work to develop strong partnerships with the City of Charlottesville Council, Departments, and staff.	CRHA continues to meet regularly with the City. The PMT grant is coming to a close this fiscal year.
9. In conjunction with PHAR, continue to promote a Section 3 program that provides job training and seek-out employment opportunities for CRHA Public Housing residents, Voucher holders and other eligible individuals in our Community.	CRHA Section 3 Program is now operating under the Resident Services department to assist with addressing barriers and other service needs.
10. Implement a complete revision/update to CRHA's Admissions and Continued Occupancy Policy in conjunction with the RAB/RC	COMPLETED. The ACOP is reviewed annually and may be adjusted if required by implementation of the final rule for implementation of Housing Opportunity Through

and Legal Aid Justice Center. These changes should be compatible with redevelopment goals and seek to “sync up” with policies affecting residents post-redevelopment.	Modernization Act’s (HOTMA) public housing income limit requirements.
11. Continue to increase efforts to acquire funding through grants and other resources to enhance CRHA programs.	Ongoing. The CRHA continues to pursue funding to increase capacity and service options. The CRHA was successful in funding several resident services career track positions through grant funding.
12. Set up a non-profit arm to assist in accessing more funding streams to help build more resident service opportunities.	Ongoing. The CRHA board has approved this and the agency is currently working on Standard Operating Procedures.
13. Bring services to each site by exploring various service providers offered through partnerships between CRHA and Resident Services Committee. Improve partnerships and cooperative programming opportunities to enhance services provided at CRHA’s medical clinic facilities. <ul style="list-style-type: none"> <li>a. Strive to increase resident involvement in Resident Services Committee</li> <li>b. Survey residents as to what services they want to see in their neighborhoods.</li> <li>c. Pursue relationships through which community center, computer lab, green and garden space and other shared community spaces can be enhanced.</li> </ul>	The CRHA has established a resident services department in the Westhaven Center. Staff are working with residents on coordination of service providers in the new centers that will be opening soon in Crescent Halls and South First Street Phasez One.
<b>HOUSING PROGRAM GOALS</b>	
14. Continue with the implementation of a comprehensive maintenance plan. <ul style="list-style-type: none"> <li>● Improve the policy and procedure for reporting maintenance issues.</li> <li>● Continue to renovate or modernize existing public housing units with specific consideration on air quality improvement.</li> <li>● Improve the bi-annual inspection process.</li> <li>● Landscape management improvements including common areas.</li> <li>● Ensure that Maintenance training is provided and made available to staff.</li> <li>● Develop, publish and implement a comprehensive Property Maintenance Plan for all CRHA communities.</li> </ul>	Housing Team continues to work in partnership with maintenance to encourage and enforce the procedures for what to report, when to report and how to report maintenance issues, through written notices, verbal notice of the proper procedures. Since April, the Housing Team has completed the bi-annual inspections for all PH units, which had not been completed in 2 years fully due to COVID restrictions. Housing Office & Maintenance Supervisor continues to work in partnership to improve Landscape management. Due to contract issues the maintenance department had to bring most of the Landscape maintenance back in house. Once brought back in house maintenance experienced its own significant turnover and therefore Landscape maintenance improvement continues to be an area of improvement. Development of Maintenance Plan had to be put on pause due to other priorities, however, Housing & Maintenance supervisor will be working on it with a tentative completion of draft date of 12/31/22, possibly sooner. This draft is attached under C 2.
15. Continue to improve integrated pest management: (IPM) A broad-based approach that integrates practices for economic control of pests. IPM aims to suppress pest populations, particularly bed bugs, giving careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations and keep pesticides and other interventions to levels that are economically justified and reduced or minimize risks to human health and the environment.	Currently the Housing Team in partnership with the Maintenance Supervisor to continue to improve. We have met with the Pest Control company to discuss preventative maintenance plans to address increased rodent activity seen not only on PH sites but city wide in Charlottesville. We also have inquired on what percentage of “Green” products are used by the company, which we understand determines an increase or decrease on the footprint that CRHA is making on the community and environment.
16. Reduce public housing vacancies with a goal of 98% or better. Bring currently “off-line” units back in service within 6 months.	Since April 2022 the Housing Team in partnership with Maintenance has continued to improve communication, upkeep of the turn board so that processes for turns and occupancy are quicker, cleaner and more efficient and

	decrease and sustain decreased vacancy numbers.
<p>17. In line with HUD's Mission, continue to improve lease enforcement and ensure the safety and welfare of our residents.</p> <ul style="list-style-type: none"> <li>• Enforce Lease provisions.</li> <li>• Promptly notify Residents of Lease changes.</li> <li>• Regularly update and publish the CRHA Barment list.</li> <li>• Provide Barment training for staff and police personnel.</li> <li>• Conduct workshop on Barment Policy with residents.</li> <li>• Implement public housing security improvements.</li> <li>• Maintain a working relationship with the Police Department.</li> <li>• Pursue Security through alternative technology and security staffing.</li> <li>• Develop a recorded digital content policy.</li> <li>• Provide support for community safety initiatives to improve resident involvement.</li> <li>• Address supplemental lighting issues</li> </ul>	<p>Prior to April 2022 lease enforcement had been slow due to staff turnover and COVID restrictions affecting operations, however, since that time lease enforcement has seen a significant uptake to get back to business. Currently, we are enforcing any and all lease violations, notifying residents of changes. Although CPD no longer needs or wants to be made aware of Barments, however, we continue to Barr people as needed and keep record of it. Upcoming in 2023 we will schedule and conduct a workshop on Barment where the residents are invited to attend. Housing Office continues to attend meetings for Crisis Intervention &amp; Safety.</p> <p>We plan to more regularly attend safety meetings as a team and provide advocacy for supplemental lighting, more cameras &amp; onsite security.</p>
18. Allow capital funding for Emergency Items, Deferred Maintenance, Sinks, Commodes, Faucets, Doors/Windows and related hardware, Shower pan/tub replacement, Vehicles, Bed Bug Treatment Equipment, Vacancy Reduction / off-line substantial rehab, other capital equipment needs/materials/services, support for Section 3 program.	Ongoing support for Section 3. CRHA and PHAR have conducted 20 joint Parallel track meetings to engage with the residents at the scattered sites in AMP and completed 44 door knock events to better engage on an individual approach in an attempt to hear every residents voice. Currently working to procure a firm to replace the HVAC, roof, siding and windows at Michie, Madison and Riverside.
19. Hire and train residents in the management of their public housing authority. Explore on-the-job training and development opportunities.	Hired HCV recipient as Assistant Asset Manager to train and learn management policies & procedures and get certified. We do plan in the future to duplicate this process with eligible PH or HCV participants.
20. Increase all staff including CRHA's Administrative Office staff presence within CRHA communities.	CRHA continues to increase staffing. Staff is in community on a regular basis door knocking, assisting in collecting documents, assess damages and to hand deliver notices.
21. Enhance sense of community within CRHA neighborhoods through the facilitation of organized activities and community improvements. Services/activities for youth are key concern. Further, during times of relocation and construction, community activities should be increased.	The CRHA Resident Services Department is working on bringing service providers back into the community. Housing Team continues to partner with Resident Services team to facilitate organized activities and community improvements. Neighborhood Crisis intervention team has been meeting which is composed of CRHA staff and community partners.
<p>22. Relocation planning</p> <ol style="list-style-type: none"> <li>Work with residents at sites undergoing redevelopment on relocation plans to submit to the board.</li> <li>Work in partnership with local service providers to coordinate resident Advisory Board and focus on needs of residents undergoing relocation.</li> </ol>	Housing Team continues to partner regularly with Relocation Department, as well as Resident Services to coordinate actions & events regarding relocation to include providing information, updates and ideas for future relocations.
<b>VOUCHER PROGRAM GOALS</b>	
23. Arrange Board/public/staff training on HCV program. Provide trainings on the HCV Admin Plan in such a way that understanding is increased by HCV Participants, Board, Staff, Landlords and Community Partners.	HCV Department recently hired HCV Specialist. HCV Department will continue to grow, and plan to hire additional staff accordingly.
24. Landlord briefing and outreach every 6 months.	Ongoing. CRHA has schedule the landlord briefing for March 2023.
25. Implementation of the Homeownership Program in 2022.	Ongoing. Currently working on the SOP's.
26. HCV Program to seek resources with the Homeownership Program with Down Payment Assistance with VHDA, CBDG funds, Habitat for Humanity and other resources.	Ongoing. Currently working on the SOP's
27. Contacting Banking Resources for the HCV Program for Outreach for lending qualifications and network with VHDA.	Ongoing
28. To obtain certification of Homeownership Counselor Certification.	Ongoing

29. Have the annual recertifications and inspections biannually. The year of the annual recertification will be conducted and the next following year will be the annual section as a supplement of the continued assistance.	This process is under continual improvement.
30. Elderly and disable household communities, network with the family and property manager to prevent the hardship of new change with the software RentCafe with training with Tax Credit properties.	Ongoing
<b>REDEVELOPMENT AND RENOVATION GOALS</b>	
<p>31. CRHA anticipates that we will intensify the on-going redevelopment effort within the next year and our intent is to explore/implement the various areas of this process.</p> <ul style="list-style-type: none"> <li>a. Complete the implementation of all required demolition and disposition activities and HUD applications needed to facilitate a redevelopment of South First Phase II and facilitate LIHTC application for new development at 6th Street</li> <li>b. Begin process of engaging Westhaven Community for future LIHTC application.</li> <li>c. Complete renovation of Crescent Halls</li> <li>d. Assess all existing Public Housing stock to determine which communities should undergo either redevelopment or modernization.</li> <li>e. Continue to add redevelopment skills to CRHA staff either through staffing or consultant services. Open such trainings to residents.</li> <li>f. Continue to work in conjunction with and in support of the Charlottesville Community Development Corporation (CCDC) to facilitate CRHA's redevelopment activities.</li> <li>g. Explore, and where appropriate, convert Housing Choice Vouchers to Project Based Vouchers to support CRHA's redevelopment plans and objectives. Seek additional vouchers to support PBV purposes (VASH; Mainstream).</li> <li>h. In conjunction with PHAR continue to educate residents about redevelopment opportunities.</li> <li>i. Either independently or in partnership with local agencies explore home ownership programs and options. Explore and implement a homeownership program and consider utilizing a "land trust" model.</li> <li>j. Continue working with TING to implement roll-out of internet access at sites.</li> <li>k. Research possibilities with HUD Section 202 Supportive Housing for the Elderly Program potentially for future redevelopment.</li> </ul>	<p>All CRHA AMPs are currently undergoing renovation, redevelopment, or actively planning redevelopment using our "Resident Led" approach.</p> <ul style="list-style-type: none"> <li>A. Demolition and Disposition Application for South First Street Phase 2 has been submitted to HUD and additional LIHTC funding has been gained. A LIHTC application for Sixth Street Phase 1 (building A) was submitted and either LIHTC or the state version will be utilized. Resident demo/dispo meeting will be held the second week of October.</li> <li>B. Resident Led planning at Westhaven was begun in September 2022. CRHA plans to identify a first phase for a LIHTC application in 2024.</li> <li>C. Crescent Halls is due to be fully completed in early 2023.</li> <li>D. The sustainability study affirms the approach to redevelop, renovation, and modernization strategies as being ideal and realistic.</li> <li>E. CRHA has held multiple trainings for staff and residents including: LIHTC management, HUD CFP, Fair Housing etc.</li> <li>F. CRHA/CCDC continues to operate as a mirror entity</li> <li>G. CRHA has included HCV conversion to PBV at South First Street, Crescent Halls, and anticipates the need for this at Sixth Street. CRHA has sought and received additional vouchers including VASH, Mainstream and Relocation and Tenant Protection Vouchers.</li> <li>H. CRHA partners with PHAR on resident outreach and education on redevelopment/development matters. PHAR carried out workshops with the support of CRHA to develop a Positive Vision for Westhaven Redevelopment.</li> <li>I. CRHA has begun discussion and research with the HCV department to identify homeownership program scenarios.</li> <li>J. TING has provided infrastructure for internet services at South First Street Phase 1 and Crescent Halls</li> <li>K. CRHA continues to evaluate this strategy for future use at Sixth Street or Westhaven.</li> </ul>
32. In partnership with local agencies explore home ownership options and provide individual support for residents in accordance with the Resident's Bill of Rights for Redevelopment. Explore and implement a homeownership program utilizing a "land trust"	CRHA has begun discussion and research with the HCV department to identify homeownership program scenarios.

model.	
33. Continue working with TING to implement roll-out of internet access at sites.	See item J. above

**B. FY 2023- 2024 Annual Plan Goals**

Goals and Objectives	Tie in # with Five Year Plan	Mark if Continuing from last FY
AGENCY WIDE GOALS		
1. Continue to pursue funding to re-establish and build CRHA's FSS program following HUD "best practices" and guidelines. Report out to the Commission at Board meetings. Engage the FSS program with partner organizations such as the Financial Opportunity Center.	3	X
2. Continue a process where CRHA will be responsible for producing an annual report with a summary of CRHA's financials.	4	X
3. Continue to focus on improving customer service skills of all who work with CRHA (including staff and contractors) to ensure professional dealings with Residents and Public.	1	X
4. Continue to support the goals and efforts of the Residents for Respectful Research.	1	X
5. Continue to improve rent collections to improve financial viability. Reduce Tenant Accounts Receivable to less than 5%. Continue develop and partner with Eviction Prevention Programs to assist participants in public housing with individual and family stabilization.	1	X
6. Continue to revamp our website, social media, calendar and communications plan. Explore partnerships with IT organizations and non-profits. Create methods to enable Recertifications to be done online. Implement method by which rental payments can be received online.	1	X
7. Continue quarterly "Report-out" on HCV and Public Housing waiting list status in such a manner that increases the public's understanding of wait list function and scope.	1	X
8. Continue to work to develop strong partnerships with the City of Charlottesville Council, Departments, and staff.	1, 3	X
9. Continue to promote and build a Section 3 economic opportunity program that provides job training and seek-out employment opportunities for CRHA Public Housing residents, Voucher holders and other eligible individuals in our Community.	1, 3	X
10. Revise CRHA's Admissions and Continued Occupancy Policy in conjunction with the RAB/RC and Legal Aid Justice Center as needed due to HUD rule changes such as HOTMA. Changes should be compatible with redevelopment goals and seek to "sync up" with policies affecting residents post-redevelopment.	1, 4	X
11. Continue to increase efforts to acquire funding through grants and other resources to enhance CRHA programs.	2	X
12. Continue process of setting-up SOPs for non-profit arm to assist in accessing more funding streams to help build more resident service opportunities.	2	X
13. Continue to increase services to each site by exploring various service providers and setting up one-stop shops per residents' request. a. Strive to increase resident involvement in Resident Services Committee. b. Improve partnerships and cooperative programming opportunities to enhance services provided at CRHA's medical clinic facilities. c. Continue to ask and survey residents as necessary to find what services they want to see in their neighborhoods. d. Continue to pursue relationships through which community center, computer lab, green and garden space and other shared community spaces can be enhanced.	2	X

HOUSING PROGRAM GOALS		
14. Continue with the development, publishing and implementation of a comprehensive Property Maintenance Plan for all CRHA communities. a. Continue to improve the policy and procedure for reporting maintenance issues. b. Continue to renovate or modernize existing public housing units with specific consideration on air quality improvement. c. Continue to improve the bi-annual inspection process. d. Continue to focus on landscape management improvements including common areas. e. Continue to ensure that Maintenance training is provided and made available to staff.	1	X
15. Continue to improve on integrated pest management: (IPM) A broad-based approach that integrates practices for economic control of pests. IPM aims to suppress pest populations, particularly bed bugs, giving careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations and keep pesticides and other interventions to levels that are economically justified and reduced or minimize risks to human health and the environment.	1	X
16. Continue to maintain reduction of public housing vacancies with a goal of 98% or better. Bringing currently “off-line” units back in service within 6 months.	1	X
17. In conjunction with PHAR continue to provide support for community safety initiatives to improve resident involvement and continue to address supplemental lighting issues	1	X
18. In line with HUD’s Mission, continue to improve lease enforcement and ensure the safety and welfare of our residents. a. Continue to enforce Lease provisions. b. Continue to promptly notify Residents of Lease changes. c. Continue to regularly update and publish the CRHA Barment list. d. Provide Barment training for staff and police personnel. e. Conduct workshop on Barment Policy with residents. f. Continue to work with residents to implement public housing security improvements. g. Continue to focus on building a positive working relationship with the Police Department. h. Continue to pursue Security through alternative technology and security staffing. i. Continue to work with residents on maintaining the recorded digital content policy and amending as needed.	1	X
19. Continue to allow capital funding for Emergency Items, Deferred Maintenance, Sinks, Commodes, Faucets, Doors/Windows and related hardware, Shower pan/tub replacement, Vehicles, Bed Bug Treatment Equipment, Vacancy Reduction / off-line substantial rehab, other capital equipment needs/materials/services, support for Section 3 program. Continue pursuing opportunities to increase funds for soft costs	1, 2	X
20. Continue to hire and train residents in the management of their public housing authority. Explore on-the-job training and development economic building opportunities that CRHA’s Section 3 staff can also benefit.	1, 3, 4	X
21. Continue to increase all staff including CRHA’s Administrative Office staff presence within CRHA communities.	1	X
22. Continue to work with residents to enhance sense of community within CRHA neighborhoods through the facilitation of organized activities and community improvements. Coming out of COVID focus on services/activities for youth are key concern. Further, during times of relocation and construction, community activities should be increased.	1	X

23. Relocation planning c. Continue to work with residents at sites undergoing redevelopment on relocation plans to submit to the board. d. Continue to work in partnership with resident services and local service providers to coordinate resident Advisory Board and focus on needs of residents undergoing relocation.	2	X
24. Schedule specific time to work in depth with Resident Coordinators from PHAR to teach policies and procedures so that they can be more effective liaisons for public housing residents.	1	
VOUCHER PROGRAM GOALS		
25. CRHA's HCV Program will continue to work closely with Housing Urban Development and City of Charlottesville to enhance services for all families serve. a. CRHA will continue to arrange Board/public/staff training on HCV program. b. HCV Administrative Plan will be updated as needed in consistent will all HUD's regulatory requirements. c. Provide trainings on the HCV Admin Plan in such a way that understanding is increased by HCV Participants, Board, Staff, Landlords and Community Partners.	1, 4	X
26. HCV Program will continue the availability of decent, safe, and affordable housing by conducting outreach to unit owners throughout the Voucher Program and through partnership with outside resources. Continue landlord briefing and outreach every 6 months, or virtual workshops with Affordable Housing Partners and Local Fair Housing Office.	1, 4	X
27. Continue to focus on developing homeownership program a. Continue to seek resources with Down Payment Assistance with Piedmont Housing Alliance, CBDG funds, Habitat for Humanity, and other resources. b. Continue to work to obtain certification of Homeownership Counselor Certification to start the homeownership program.	1, 4	X
28. The HCV participates with fixed income will be Triennial recertification process, with a biannual inspection. The non-fixed income family will continue with annual recertification with a biannual inspection if the unit passes inspection without any deficiencies.	1, 4	
29. HCV Program will continue to update its website and social media outlet to improve outreach and promote knowledge of CRHA mission and accomplishments. CRHA staff will increase outreach with families and property managers to prevent the hardship of new change with the software Rent Cafe and with Training for the Tax Credit Properties.	1, 4	X
30. CRHA plans to re-open HCV waiting list by end of the fiscal year of March 31, 2023	1, 4	
31. The HCV Program will continue to explore competitive funding opportunities as it becomes available with programs such as VASH, Family Unification, Fostering Youth Initiative and other Special Voucher Allocation Funding opportunities as they become available.	1, 4	
REDEVELOPMENT AND RENOVATION GOALS		



<p>32. CRHA anticipates that we will continue to intensify the on-going redevelopment effort within the next year and our intent is to explore/implement the various areas of this process</p> <ul style="list-style-type: none"> <li>a. Complete the implementation of all required demolition and disposition activities and HUD applications needed to facilitate a redevelopment of South First Phase II and facilitate LIHTC application for new development at 6th Street</li> <li>b. Continue process of engaging Westhaven Community for future LIHTC application.</li> <li>c. Complete renovation of Crescent Halls</li> <li>d. Assess all existing Public Housing stock to determine which communities should undergo either redevelopment or modernization.</li> <li>e. Continue to add redevelopment skills to CRHA staff either through staffing or consultant services. Open such trainings to residents.</li> <li>f. Continue to work in conjunction with and in support of the Charlottesville Community Development Corporation (CCDC) to facilitate CRHA's redevelopment activities.</li> <li>g. Explore, and where appropriate, convert Housing Choice Vouchers to Project Based Vouchers to support CRHA's redevelopment plans and objectives. Seek additional vouchers to support PBV purposes (VASH; Mainstream).</li> <li>h. In conjunction with PHAR continue to educate residents about redevelopment opportunities.</li> <li>i. Either independently or in partnership with local agencies explore home ownership programs and options. Explore and implement a homeownership program and consider utilizing a "land trust" model.</li> <li>j. Continue working with TING to implement roll-out of internet access at sites.</li> <li>k. Research possibilities with HUD Section 202 Supportive Housing for the Elderly Program potentially for future redevelopment.</li> </ul>	1, 2, 3	X
<p>33. In partnership with local agencies explore home ownership options and provide individual support for residents in accordance with the Resident's Bill of Rights for Redevelopment. Explore and implement a homeownership program utilizing a "land trust" model.</p>	2, 3	X
<p>34. Continue working with TING to implement roll-out of internet access at sites.</p>	1	X

### III. Housing Needs

#### A. Current Families in CRHA Public Housing

### Resident Characteristics Report

As of August 31, 2022

Program type : **Public Housing**

Level of Information : **Housing Agency within State VA**

Effective Dates Included : **May 01, 2021 through August 31, 2022**



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NOTE: Percentages in each area may not total 100 percent due to rounding.

#### Units Information

HA	ACC Units	50058 Required	50058 Received
VA	14,600	12,605	10,231
VA016 - Charlottesville RHA	324	254	250

#### Income Information

##### Distribution of Average Annual Income as a % of 50058 Received

HA	Extremely Low Income, Below 30% of Median		Very Low Income, 50% of Median		Low Income, 80% of Median		Above Low Income, 81%+ of the Median		Geo-Coded Income Data Not Available In PIC Data Systems	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	8,212	66	2,193	18	932	7	265	2	922	7
VA016 - Charlottesville RHA	180	71	42	17	11	4	1	0	18	7

##### Average Annual Income (\$)

HA	Average Annual Income
VA	13,470
VA016 - Charlottesville RHA	13,977

##### Distribution of Annual Income as a % of 50058 Received

HA	\$ 0	\$1 - \$5,000	\$5,000 - \$10,000	\$10,001 - \$15,000	\$15,001 - \$20,000	\$20,001 - \$25,000	Above \$25,000
VA	4	19	19	27	10	7	14
VA016 - Charlottesville RHA	5	15	26	19	12	5	18

##### Distribution of Source of Income as a % of 50058 Received \*\* Some families have multiple sources of income \*\*

HA	With any wages	With any Welfare	With any SSI/SS/Pension	With any other Income	With No Income
VA	32	31	48	25	3
VA016 - Charlottesville RHA	35	42	44	21	4

#### TTP/Family Type Information

##### Distribution of Total Tenant Payment as a % of 50058 Received

HA	\$0	\$1 - \$25	\$26 - \$50	\$51 - \$100	\$101 - \$200	\$201 - \$350	\$351 - \$500	\$501 and Above
VA	0	1	15	8	10	36	12	18
VA016 - Charlottesville RHA	0	0	15	6	16	29	12	22

Average Monthly TTP (\$)	
HA	Average Monthly TTP
VA	318
VA016 - Charlottesville RHA	329

**Distribution of Family Type as a % of 50058 Received**

HA	Elderly, No Children, Non-Disabled		Elderly, with Children, Non-Disabled		Non-elderly, No Children, Non-Disabled		Non-elderly, with Children, Non-Disabled		Elderly, No Children, Disabled		Elderly, with Children, Disabled		Non-elderly, No Children, Disabled		Non-elderly, with Children, Disabled		Female Headed Household with Children	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	1,018	8	51	0	1,766	14	5,382	43	1,761	14	62	0	1,786	14	698	6	5,810	46
VA016 - Charlottesville RHA	15	6	2	1	33	13	122	48	30	12	5	2	28	11	17	7	121	48

**Average TTP by Family Type ( \$ )**

HA	Elderly, No Children, Non-Disabled	Elderly, with Children, Non-Disabled	Non-elderly, No Children, Non-Disabled	Non-elderly, with Children, Non-Disabled	Elderly, No Children, Disabled	Elderly, with Children, Disabled	Non-elderly, No Children, Disabled	Non-elderly, with Children, Disabled	Female Headed Household with Children
VA	354	584	361	298	320	403	294	339	302
VA016 - Charlottesville RHA	378	494	276	321	329	434	353	357	311

**Family Race/Ethnicity Information**

**Distribution by Head of Household's Race as a % of 50058 Received**

HA	White Only	Black/African American Only	American Indian Or Alaska Native Only	Asian Only	Native Hawaiiin/Other Pacific Islander Only	White, American Indian/Alaska Native Only	White, Black/African American Only	White, Asian Only	Any Other Combination
VA	20	78	0	0	0	0	1	0	0
VA016 - Charlottesville RHA	18	77	0	3	0	0	1	0	0

**Distribution by Head of Household's Ethnicity as a % of 50058 Received**

HA	Hispanic or Latino	Non - Hispanic or Latino
VA	2	98
VA016 - Charlottesville RHA	1	99



## Household Information

### Distribution by Household Members Age as a % of Total Number of Household Members

HA	0 - 5		6 - 17		18 - 50		51 - 61		62 - 82		83+	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	4,127	15	8,861	31	9,767	35	2,448	9	2,843	10	202	1
VA016 - Charlottesville RHA	111	16	251	35	237	33	58	8	56	8	1	0

### Distribution by Household Size as a % of 50058 Received

HA	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons	9 persons	10+ persons
VA	41	23	17	10	5	2	1	0	0	0
VA016 - Charlottesville RHA	30	19	21	14	6	6	2	1	0	0

### Total Household Members and Average Household Size

HA	Total Number of Household Members	Average Household Size	Total Number of Households
VA	28,248	2.3	12,524
VA016 - Charlottesville RHA	714	2.8	252

### Distribution by Number of Bedrooms as a % of 50058 Received

HA	0 Bedrooms	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms	5+ Bedrooms
VA	2	30	37	24	6	1
VA016 - Charlottesville RHA	0	8	30	45	12	5

## Length of Stay Information

### Distribution by Length of Stay as a % of 50058 Received (currently assisted families)

HA	Less than 1 year		1 to 2 years		2 to 5 years		5 to 10 years		10 to 20 years		Over 20 years	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	2,075	17	1,140	9	3,338	27	2,792	22	2,032	16	1,147	9
VA016 - Charlottesville RHA	33	13	25	10	55	22	48	19	48	19	43	17

## B. Public Housing Waitlist

Waitlist: ph\_wl

### B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

#### Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

☐ Section 8 tenant-based assistance☒ **Public Housing**☐ Combined Section 8 and Public Housing☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	1125		
Extremely low income <=30% AMI	533	47.4%	
Very low income (>30% but <=50% AMI)	76	6.8%	
Low income (>50% but <80% AMI)	9	0.8%	
Families with children	279	24.8%	
Elderly families	99	8.8%	
Families with Disabilities	306	27.2%	
Race/ethnicity (White)	272	24.2%	
Race/ethnicity (Black)	645	57.3%	
Race/ethnicity (Asian/Other)	48	4.3%	
Race/ethnicity (Hispanic)	42	3.7%	
Characteristics by Bedroom Size (PH Only)			
1 BR	721	64.1%	
2 BR	186	16.5%	
3 BR	99	8.8%	
4 BR	48	4.3%	
5 BR	71	6.3%	
5+ BR	0	0.0%	

Is the waiting list closed (select one)? ☒ No ☐ Yes If yes:

How long has it been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ YesDoes the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

## C. Current Families participating in CRHA HCV Program

### Resident Characteristics Report As of August 31, 2022

Program type : All Voucher Funded Assistance

Level of Information : Housing Agency within State VA

Effective Dates Included : May 01, 2021 through August 31, 2022



NOTE: Percentages in each area may not total 100 percent due to rounding.

#### Units Information

HA	ACC Units	50058 Required	50058 Received
VA	0	26	46,332
VA016 - Charlottesville RHA	0	-3	479

#### Income Information

##### Distribution of Average Annual Income as a % of 50058 Received

HA	Extremely Low Income, Below 30% of Median		Very Low Income, 50% of Median		Low Income, 80% of Median		Above Low Income, 81%+ of the Median		Geo-Coded Income Data Not Available In PIC Data Systems	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	0	0	0	0	0	0	0	0	46,332	100
VA016 - Charlottesville RHA	0	0	0	0	0	0	0	0	479	100

##### Average Annual Income (\$)

HA	Average Annual Income
VA	16,160
VA016 - Charlottesville RHA	17,077

##### Distribution of Annual Income as a % of 50058 Received

HA	\$ 0	\$1 - \$5,000	\$5,000 - \$10,000	\$10,001 - \$15,000	\$15,001 - \$20,000	\$20,001 - \$25,000	Above \$25,000
VA	5	9	17	29	12	9	19
VA016 - Charlottesville RHA	4	5	20	24	16	8	23

##### Distribution of Source of Income as a % of 50058 Received \*\* Some families have multiple sources of income \*\*

HA	With any wages	With any Welfare	With any SSI/SS/Pension	With any other Income	With No Income
VA	35	22	57	21	3
VA016 - Charlottesville RHA	38	35	55	18	2

#### TTP/Family Type Information

##### Distribution of Total Tenant Payment as a % of 50058 Received

HA	\$0	\$1 - \$25	\$26 - \$50	\$51 - \$100	\$101 - \$200	\$201 - \$350	\$351 - \$500	\$501 and Above
VA	1	0	9	4	8	39	16	25
VA016 - Charlottesville RHA	0	0	7	3	8	35	20	28

##### Average Monthly TTP (\$)

HA	Average Monthly TTP
VA	384
VA016 - Charlottesville RHA	408



## TTP/Family Type Information

### Distribution of Total Tenant Payment as a % of 50058 Received

HA	\$0	\$1 - \$25	\$26 - \$50	\$51 - \$100	\$101 - \$200	\$201 - \$350	\$351 - \$500	\$501 and Above
VA	1	0	9	4	8	39	16	25
VA016 - Charlottesville RHA	0	0	7	3	8	35	20	28

### Average Monthly TTP (\$)

HA	Average Monthly TTP
VA	384
VA016 - Charlottesville RHA	408

### Distribution of Family Type as a % of 50058 Received

HA	Elderly, No Children, Non-Disabled		Elderly, with Children, Non-Disabled		Non-elderly, No Children, Non-Disabled		Non-elderly, with Children, Non-Disabled		Elderly, No Children, Disabled		Elderly, with Children, Disabled		Non-elderly, No Children, Disabled		Non-elderly, with Children, Disabled		Female Headed Household with Children	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	3,400	7	227	0	6,549	14	15,877	34	7,626	16	467	1	8,720	19	3,466	7	18,948	41
VA016 - Charlottesville RHA	23	5	2	0	69	14	176	37	81	17	2	0	109	23	17	4	185	39

### Average TTP by Family Type ( \$ )

HA	Elderly, No Children, Non-Disabled	Elderly, with Children, Non-Disabled	Non-elderly, No Children, Non-Disabled	Non-elderly, with Children, Non-Disabled	Elderly, No Children, Disabled	Elderly, with Children, Disabled	Non-elderly, No Children, Disabled	Non-elderly, with Children, Disabled	Female Headed Household with Children
VA	370	512	403	427	331	471	316	423	426
VA016 - Charlottesville RHA	456	478	415	484	316	450	326	492	476

## Family Race/Ethnicity Information

### Distribution by Head of Household's Race as a % of 50058 Received

HA	White Only	Black/African American Only	American Indian Or Alaska Native Only	Asian Only	Native Hawaiian/Other Pacific Islander Only	White, American Indian/Alaska Native Only	White, Black/African American Only	White, Asian Only	Any Other Combination
VA	24	74	0	1	0	0	0	0	0
VA016 - Charlottesville RHA	21	77	0	1	0	0	0	0	0

### Distribution by Head of Household's Ethnicity as a % of 50058 Received

HA	Hispanic or Latino	Non - Hispanic or Latino
VA	3	97
VA016 - Charlottesville RHA	2	98

## Household Information

### Distribution by Household Members Age as a % of Total Number of Household Members

HA	0 - 5		6 - 17		18 - 50		51 - 61		62 - 82		83+	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	10,088	10	33,064	32	37,343	36	11,575	11	11,767	11	918	1
VA016 - Charlottesville RHA	118	12	296	30	320	32	152	15	111	11	4	0

### Distribution by Household Size as a % of 50058 Received

HA	1 person	2 persons	3 persons	4 persons	5 persons	6 persons	7 persons	8 persons	9 persons	10+ persons
VA	45	20	15	10	6	2	1	0	0	0
VA016 - Charlottesville RHA	48	20	15	9	6	1	0	0	0	0

### Total Household Members and Average Household Size

HA	Total Number of Household Members	Average Household Size	Total Number of Households
VA	104,755	2.3	46,332
VA016 - Charlottesville RHA	1,001	2.1	479

### Distribution by Number of Bedrooms as a % of 50058 Received

HA	0 Bedrooms	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms	5+ Bedrooms
VA	3	20	40	30	6	1
VA016 - Charlottesville RHA	8	23	35	34	1	0

## Length of Stay Information

### Distribution by Length of Stay as a % of 50058 Received (currently assisted families)

HA	Less than 1 year		1 to 2 years		2 to 5 years		5 to 10 years		10 to 20 years		Over 20 years	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
VA	7,440	16	3,784	8	8,157	18	9,380	20	12,370	27	4,869	11
VA016 - Charlottesville RHA	156	33	54	11	26	5	114	24	65	14	55	11



## D. Families on the Housing Choice Voucher (HCV) Waitlist

Page 1

Waitlist: hcv\_wl

## B. Housing Needs of Families on the Public Housing Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. Complete one table for each type of PHA-wide waiting list administered by the PHA. PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

### Housing Needs of Families on the Waiting List

Waiting List Type: (select one)

☒ Section 8 tenant-based assistance

☐ **Public Housing**

☐ Combined Section 8 and Public Housing

☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)Housing

If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	603		
Extremely low income <=30% AMI	496	82.3%	
Very low income (>30% but <=50% AMI)	25	4.1%	
Low income (>50% but <80% AMI)	82	13.6%	
Families with children	257	42.6%	
Elderly families	45	7.5%	
Families with Disabilities	186	30.9%	
Race/ethnicity (White)	173	28.7%	
Race/ethnicity (Black)	432	71.6%	
Race/ethnicity (Asian/Other)	50	8.3%	
Race/ethnicity (Hispanic)	40	6.6%	
Characteristics by Bedroom Size (PH Only)			
1 BR	0	0.0%	
2 BR	0	0.0%	
3 BR	0	0.0%	
4 BR	0	0.0%	
5 BR	0	0.0%	
5+ BR	0	0.0%	

Is the waiting list closed (select one)? ☒ No ☐ Yes If yes:

How long has it been closed (# of months)? 18 MONTHS

Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☒ Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☒ Yes

#### IV. Resident Advisory Board (RAB) Engagement

##### A. Meetings with RAB

#### 7/13/22 CRHA Annual Plan Kick-Off for 2023- 2024 with RAB, CRHA and other planning team members

In attendance: Joy Johnson (RAB and CRHA), Mary Lou Hoffman (CRHA), Allexis Cooper (PHAR and PH resident), Dr. A’lelia Henry (CRHA Resident Commissioner), Asia Green PHAR and PH resident), (Consuela Knight (CRHA), Crystal Darcus (CRHA), Emily Smith (LAJC), Judy Sandrige (RAB and CRHA Resident Commissioner), Alice Washington (RAB), Kelcee Jones (PHAR), Moriah Wilkins (LAJC), Paola Covarrubias (PHAR), Shelby Edwards (PAHR), Syleethia Carr (PHAR), TerAna Banks (CRHA), Harriet Carter (RAB) and Kathleen Glenn-Matthews (CRHA)

#### Agenda (See attached presentation)

- I. Introductions
- II. AP Overview
- III. What’s new this time
- IV. Planning for next steps

#### Comments and questions:

Comment or Question
Attendee- I know to a certain extent this is HUD’s doing and we can only push against it so much asked Moriah with LAJC for thoughts, but want to be cognizant that he Deconcentration of Poverty and Income Mixing can very much- higher income people get to be more picky about where they live and and lower income tend to have it dictated to them and want to have a healthy level of skepticism even though we want people to have economic mobility as they so choose bu t not one super imposed.
Moriah Wilkinson- As long as we have the new AFFH it will pair well. Have similar concerns to Shelby.
Joy Johnson (narrator)- A great concern and why we need to make absolutely sure we look at home much and make it deeply affordable on CRHA properties. Know PHAR has pushed against mixed income for some time. We have it but may not be what they are looking for. For our properties we need to make sure it is affordable to our folks going forward. You are right the political will has not been there so on our property we need to have the political will to make sure it is truly mixed income.
TerAna Banks- Agree with conversation we just need to make sure we are super conscious we look at this when redeveloping each site and make sure we don’t go to deep into our set asides. How we set it up will make sure how affordable we keep our properties. Hopefully that will affect the neighborhood and how other developers look how they are setting up their deals and set asides for properties.
Joy Johnson /Kathleen Glenn-Matthews- AFFH trainings are open to everyone.
Dr. Henry- Is a lawyer going to be helping with this process to make sure PH residents don’t get burned in AFFH process.
Moriah said she plans to be part of the process and work with Kathleen to make sure it is as equitable as possible.
Judy- it is important for us to get more resident involved as she felt like they are giving and taking and we are getting left out.
Shelby Edwards- Would like more information on CRHA starting a non-profit as she has said she has some concerns and wants to hear more.

## CRHA Annual Plan Team Meeting with RAB

10am September 1, 2022

Hybrid

The virtual link:

<https://us06web.zoom.us/j/86525456736?pwd=eW5vcDA3ZGNkYVZkSUhkMjFaK2pldz09>

One tap mobile: +13017158592,,86525456736# Dial-in: +1 301 715 8592

Meeting ID: 865 2545 6736 Passcode: 672546



For those who are not able to access the virtual option please join us to watch at the CRHA Resident Services Center at 801 Hardy Drive.

### Agenda

#### I. Welcome and introductions

Residents: Judy Sandridge, Alice Washington, Harriett

Staff: T. Banks , Brandon Collins, Shelby Edwards, Paiola C. Alxis Cooper , Kelcie Jones,Cryatal Darcus,

#### II. AFFH

Housing Management setting goals, hoping group can start pulling together on a few goals,

Assessment process , may take longer than normal,

Moriah: will touch base with HDMA they will work on having more focus on working with the city.

Joy will work with Mally on more goal on affirmative housing

Mally: to be apart of training for internship for fair housing.

A. Working on pulling together AFFH Assessment group- any volunteers?

B. This is the link for the second training with Mally on 10am 9/22/22 AFFH Part 2

training: <https://us06web.zoom.us/j/89155103939?pwd=Z0dpeEk0d2ZjekU2ZmhWWVJvOUpsdz09>

One tap mobile: +13092053325,,89155103939# Dial-in: +1 309 205 3325 Meeting ID: 891 5510 3939 Passcode: 032227

C. Hoping group can start pulling together a few goals after this training to be used on AP.

Assessment process may take a bit longer which is okay and can also be useful as we start five-year planning at the beginning of 2023.

#### III. Google shared folder should be available soon. Giving staff time to get progress notes in for five year and last year's AP goals.

#### IV. Next meeting

Will be October 6.

A. Focus on having rough draft of Annual Plan Ready for review at October's meeting

- B. Discuss plan for public noticing
- C. Work on calendar and planning for community meetings
- D. Questions or requests for next meeting?

*Next Team Meeting: October 6, 2022, 10am (will be at the same link as today's meeting)*

**Thank you all for being here!**

**B. Resident Advisory Board (RAB) list as of 10/19/22**

<b>Name</b>	<b>Position</b>
Joy Johnson	Chairperson
Katrena Cooper	Vice-Chair
Audrey Oliver	Treasurer
Tina Washington	Secretary
Sonia Bell	Member
Harriett Carter	Member
Judy Sandridge	Member
Alice Washington	Member
Brandon Ertel	Member
LaToya Lewis	Member
Ashley Harris	Member
Michael Moore	Member

C.



## Public Housing Association of Residents (PHAR)

1000 Preston Avenue, Suite B, Charlottesville, VA 22903

phone 434-984-3255

www.pharville.org

TO: CRHA Board of Commissioners  
FROM: PHAR Board of Directors  
and Executive Committee  
RE: Annual Plan 2023-2024 Comment  
DATE: December 7, 2022

The Charlottesville Public Housing Association of Residents (PHAR) is the duly recognized Resident Advisory Board and jurisdiction-wide Resident Council for the residents of Charlottesville's public housing. We are offering the following points of consideration on the proposed Annual Plan for 2023-2024. We request that these comments and the Charlottesville Redevelopment and Housing Authority (CRHA) responses be included with the final submission of the Annual Plan. PHAR is generally supportive and enthusiastic about the Annual Plan Goals with a few minor exceptions outlined below.

### Comments on Annual Plan Goals and Progress FY 2022-2023

#### 2022-2023 Annual Plan Goals and Objectives

1. Goal 7- PHAR suggests a revision of "DHS" in the Progress Notes. PHAR believes that it should say the Housing Office instead
2. Goal 8- PHAR suggests a revision to a typo in the Progress Notes- it should say "coming" instead of "cling"
- Goal 12- PHAR suggests a revision where CRHA writes out the meaning of SOPs and writes "Standards of Practice"
3. Goal 18- PHAR would like the progress notes to include something about the Parallel Track and mention that CRHA and PHAR are in the planning stages
4. Goal 19-PHAR suggests a revision where CRHA adds the language from last year's plan if it still relevant/true, especially the portion that says: "Will be pursuing opportunities to increase funds for soft costs"
- 5.Goal 20- PHAR suggests a revision where CRHA includes the more specific language from last year. Last year it said that "CRHA PH Staff is in the community on a daily basis. Staff door knocks for flyers, visits homes to assist in collecting recertification documents, walks the property to assess damages, and visits homes to hand deliver notices."
6. Goal 21- PHAR suggests a revision where CRHA re-adds language about the Neighborhood Crisis intervention team like last year. Last year it said "Neighborhood Crisis intervention team has been meeting which is composed of CRHA staff and community partners."
7. Goal 32- PHAR suggests where CRHA inserts the text from "I" in the Progress box.



**Public Housing Association of Residents (PHAR)** 1000 Preston Avenue, Suite B,  
Charlottesville, VA 22903  
phone 434-984-  
3255  
[www.pharcville.org](http://www.pharcville.org)

In conclusion, on behalf of the PHAR Board of Directors (who serve as the RAB), PHAR is hopeful that our feedback will be considered.

Respectfully on behalf of the PHAR Board of Directors,

Joy Johnson  
Chair/President  
Charlottesville Public Housing Association of  
Residents (PHAR)

Taylor Frome,  
Executive Director (Interim)  
Charlottesville Public Housing Association of  
Residents (PHAR)

D.

CHARLOTTESVILLE REDEVELOPMENT & HOUSING AUTHORITY  
"CRHA"

P.O. BOX 1405, CHARLOTTESVILLE, VIRGINIA 22902  
TELEPHONE/TTY/711: (434) 326-4672 FAX: (434) 971-4797



TO: PHAR Resident Advisory Board  
Cc: CRHA Board of Commissioners  
FROM: John Sales, Executive Director  
RE: FY 2023- 2024 Annual Plan RAB Comments  
DATE: December 7, 2022

The Charlottesville Redevelopment and Housing Authority "CRHA" Appreciates the Resident Advisory Board "RAB" at PHAR taking the time to work with us and comment on the CRHA's FY 2023- 2024 Annual Plan. We have appreciated the partnership in the annual planning process. Please note our responses to comments in the table below.

RAB Comment	CRHA Response
<i>2023-2024 Annual Plan Goals and Objectives</i>	
1. Goal 7- PHAR suggests a revision of "DHS" in the Progress Notes. PHAR believes that it should say the Housing Office instead	1. The CRHA will make this edit in the Annual Plan draft.
2. Goal 8- PHAR suggests a revision to a typo in the Progress Notes- it should say "coming" instead of "cling".	2. The CRHA will make this edit in the Annual Plan draft.
3. Goal 12- PHAR suggests a revision where CRHA writes out the meaning of SOPs and writes "Standards of Practice"	3. The CRHA will make this edit in the Annual Plan draft.
4. Goal 18- PHAR would like the progress notes to include something about the Parallel Track and mention that CRHA and PHAR are in the planning stages	4. The CRHA will make this edit in the Annual Plan draft.
5. Goal 19- PHAR suggests a revision where CRHA adds the language from last year's plan if it still relevant/true, especially the portion that says: "Will be pursuing opportunities to increase funds for soft costs"	5. The CRHA will make this edit in the Annual Plan draft.
6. Goal 20- PHAR suggests a revision where CRHA includes the more specific language from last year. Last year it said that "CRHA PH Staff is in the community on a daily basis. Staff door knocks for flyers, visits homes to assist in collecting recertification documents, walks the property to assess damages, and visits homes to hand deliver notices."	6. The CRHA will make this edit in the Annual Plan draft.
7. Goal 21- PHAR suggests a revision where CRHA re-	7. The CRHA will make this edit in the



CRHA does not discriminate on the basis of race, color, sex, age, religion, national origin, disability, veteran status, or union affiliations in any of its federally assisted programs and activities.



adds language about the Neighborhood Crisis intervention team like last year. Last year it said "Neighborhood Crisis intervention team has been meeting which is composed of CRHA staff and community partners.	Annual Plan draft.
8. Goal 32- PHAR suggestions where CRHA inserts the text from "I" in t h eProgress box.	8. The CRHA will make this edit in the Annual Plan draft.

In closing the RAB's feedback is an essential part of the CRHA's success in working towards our goals of being a resident-driven organization. All of the changes suggested by the RAB are being made to the final draft and will be noted in Section D: *Edits to the CRHA 2022-2023 Annual Plan Draft to Finalize and in Response to Community and Board Feedback.*

We look forward to working together with PHAR in the new year.

Sincerely,

John Sales

Executive Director

**Residents FIRST!**

**Residents FIRST!** is grounded in the belief that those we serve have the knowledge, experience and power to drive the systemic change needed to sustain healthy communities and build bright futures.



## V. Resident Engagement and Public Meetings

### A. AFFH Training Pre-Annual Plan Posting

**Affordably Furthering Fair Housing (AFFH) training** with Housing and Urban Development (HUD)

Date: 7/21/2022, on zoom

- I. In attendance: Alice Washington (RAB), Ana Molina (CRHA), Alexis Cooper (resident), Syleethia Carr (PHAR), Dr. Henry (resident commissioner), Asia Green (resident), Brandon Collins (CRHA), Bridgid Wicks (commissioner), Crystal Darcus (CRHA), Emily Smith (LAJC), Judy Sandridge (resident commissioner), Kelcee Jones (PHAR), Laura Goldblatt (commissioner), Micheal (Equal Opportunity Specialist-HUD), Moriah Wilkins (LAJC), Paola Covarubias (PHAR), Shelby Edwards (PHAR), TerRana Banks (CRHA), Harriett Carter (RAB), Kathleen Glenn-Matthews (CRHA), Maya Reddy (HUD), Lena Albibi (HUD), John Sales (CRHA), Tiffany Johnson (HUD)
- II. Please see follow up below.

**From:** "Sewell, Sarale H" <Sarale.H.Sewell@hud.gov>

**Subject:** RE: <External Message> **Re: Follow-Up for Training**

**Date:** July 28, 2022 at 1:32:24 PM EDT

**To:** Kathleen Glenn-Matthews <matthewsk@cvilleha.com>

**Cc:** Joy Johnson <johnsonj@cvilleha.com>, John Sales <salesj@cvilleha.com>, "Johnson, Tiffany M" <Tiffany.M.Johnson@hud.gov>, "Reddy, Maya S" <Maya.S.Reddy@hud.gov>, "Albibi, Lena" <Lena.Albibi@hud.gov>

Good afternoon Kathleen,

Thank you again for inviting our team to present information about AFFH last week – we enjoyed meeting your team. Apologies for the delay in getting back to you, but I wanted to follow-up with the materials you requested. These are various items and resources that we mentioned during the presentation that will hopefully be helpful in your fair housing planning efforts:

- HUD's AFFH webpage: [www.hud.gov/affh](http://www.hud.gov/affh). This page is an information hub for our published AFFH materials, and includes:
  - [HUD's AFFH Interim Final Rule \(IFR\)](#), as well as a [Fact Sheet](#) and [FAQ](#) on the IFR
  - The Fair Housing Planning Guides, [Vol. 1](#) and [Vol. 2](#): these resources can help to prepare an Analysis of Impediments to Fair Housing Choice
  - The [AFFH Rule Guidebook](#): this resource can help to prepare an Assessment of Fair Housing
  - [AFFH Data and Mapping Tool](#): this was released in 2015 to aid program participants in their data analysis for the Assessment of Fair Housing
  - A series of videos, linked at the very bottom of the [Resources](#) section of HUD's AFFH webpage:
    - The Restoring Affirmatively Furthering Fair Housing Definitions and Certifications: Interim Final Rule Training
    - Introduction to the AFFH-T Mapping Tool
    - FHEO Technical Assistance (TA) Related to Affirmatively Furthering Fair Housing
    - Fair Housing Planning using the Analysis of Impediments AI to Fair Housing Choice
    - Fair Housing Planning using the Assessment of Fair Housing AFH
  - Other various fact sheets and quick guides are also linked on the [Resources](#) section of the AFFH webpage in connection with the 2015 rule
- In connection with the AFFH interim final rule, HUD will provide training and technical assistance for HUD program participants who wish to engage in fair housing planning. For general AFFH inquiries, TA requests, or voluntary submissions: [AFFH@hud.gov](mailto:AFFH@hud.gov)

If there is anything else that I can send at this time, please let me know. We are also happy to discuss your needs further in terms of training on AFFH assessment and goal setting, as you mentioned below.

Thank you,  
Sarale H. Sewell, Program Analyst

Office of Policy, Legislative Initiatives, and Outreach  
Office of Fair Housing and Equal Opportunity  
U.S. Department of Housing and Urban Development  
[Sarale.H.Sewell@hud.gov](mailto:Sarale.H.Sewell@hud.gov)

**Affordably Furthering Fair Housing (AFFH) training part 1**

with Mahalia "Mally" Dryden-Mason from DPOR

Date: 8/18/2022, 10am on zoom

In attendance: Brandon Collins (CRHA), Asia Green (resident), TerRana Banks (CRHA), Alex Ikefuna (OCS), Shelby Edwards (PHAR), Cynthia Coleman (DSS), Crystal Darcus (CRHA), Kelcee Jones (PHAR), Crystal Darcus (CRHA), Ana Molina (CRHA), Symia Tabron (CRHA), Camaran Gaillard (PHAR/RRR), Paola Covarrubias (PHAR), Judy Sandridge (resident Commissioner), Sue Moffett (DSS), Ruth Emerick (TJPDC), Tamika Grooms (CRHA), Raquel Jackson (CRHA), Erin Atak (OCS), Rika Cutchin (CRHA), Dr. Henry (resident Commissioner), Connie Owuor (CRHA), Audrey Oliver (RAB) and Laura Goldblatt (commissioner)

- I. Training on AFFH with group
- II. Discussion on next steps- group asked Mally to return and help them work to understand Goal setting more.

**Affordably Furthering Fair Housing (AFFH) training part 2** with Mahalia "Mally" Dryden-Mason from DPOR

Date: 9/22/2022, Hybrid on zoom and at Westhaven Community Center

In attendance: Aniya (Butler CRHA), Joy Johnson (RAB), TerAna Banks (CRHA), Rika Cutchin (CRHA), Kelcee Jones (PHAR), Louisa Candelario (CRHA), Judy Sandridge (Resident Commissioner), Maria Carey (CRHA), Alice Washington (RAB), John Sales (CRHA), Crystal Darcus (CRHA), Kathleen Glenn-Matthews (CRHA), Tamika Grooms (CRHA), Ruth Emerick (TJPDC), Raquel Jackson (CRHA), Nicole Jones (CRHA), Brandon Collins (CRHA), Ian Baxter (TJPDC), Cynthia Coleman (DSS), Camaran Gaillard (PHAR/RRR), Ana Molinia (CRHA), Bridgid Wicks (Commissioner), Paola Covarrubias (PHAR), Asia Green (resident), Moriah Wilkins (LAJC), Symia Tabron (CRHA), Shelby Edwards (PHAR), Alexis Cooper (PHAR), Connie Owuor (CRHA), Mary Lou Hoffman (CRHA), Harriett Carter (RAB), Michael Payne (City Councilor/ Commissioner), Nihkeya Thompson (HS), Consuela Knight (CRHA), Alex Ikefuna (OCS) and Barbra Morgan (CRHA)

- I. Review of AFFH
  - II. Discussion on CRHA AFFH goal setting
- 

**B. Posting**

**Daily Progress from October 24, 2022**

**POSTING**

The Charlottesville Redevelopment & Housing Authority (CRHA) will hold a Public Hearing regarding the FY 2023- 2024 Annual Plan, as required by HUD under Section 511 of the Quality Housing and Work Responsibility Act of 1998. The public hearing will be held as a hybrid event via an electronic meeting platform, Zoom and in person at the Westhaven Center at 801 Hardy Drive, Charlottesville, VA, on Thursday December 8, 2022, at 5pm to be followed by a Special CRHA Board of Commissioners Meeting to approve the Annual Plan. Members of the public may participate in person, by computer, tablet, or phone. Details for accessing this meeting will be included on CRHA's website. Individuals who need access to a printed copy of the plan may do so by emailing [matthewsk@cvilleerha.com](mailto:matthewsk@cvilleerha.com) or calling 434-422-9298 and asking to set up a time to view or check-out a copy of the draft. Hardcopies will be posted for public review at the CRHA Rental Offices at 1000 S 1<sup>st</sup> Street in the lower level, CRHA HCV Office at 715 6<sup>th</sup> Street SE and at the CRHA Resident Services Offices at 801 Hardy Drive. An electronic copy can be found at <https://www.cvilleerha.com/key-documents/>. Written comments will be accepted through **December 6, 2022**, and should be submitted to Kathleen Glenn-Matthews, Deputy Executive Director via email or PO Box 1405, Charlottesville VA 22902 or to [matthewsk@cvilleerha.com](mailto:matthewsk@cvilleerha.com). The virtual link for all the meetings is: <https://us06web.zoom.us/j/82252789220?pwd=VEFkUXk1paytXQ0N3OU9HQjkzcnpKZz09> and One tap mobile: +13017158592,,82252789220#

# CHARLOTTESVILLE REDEVELOPMENT & HOUSING AUTHORITY “CRHA”

P.O. BOX 1405, CHARLOTTESVILLE, VIRGINIA 22902  
TELEPHONE/TTY/711: (434) 326-4672 FAX: (434) 971-4797



**To:** CRHA Program Participants, Staff, Board of Commissioner and Stakeholders  
**From:** CRHA Administration  
**Date:** October 24, 2022  
**Subject:** Posting Draft FY 2023- 2024 Annual Plan

The Charlottesville Redevelopment & Housing Authority (CRHA) will hold a Public Hearing regarding the FY 2023- 2024 Annual Plan, as required by HUD under Section 511 of the Quality Housing and Work Responsibility Act of 1998. The public hearing will be held as a hybrid event via an electronic meeting platform, Zoom and in person at the Westhaven Center at 801 Hardy Drive, Charlottesville, VA, on Thursday December 8, 2022, at 5pm to be followed by a Special CRHA Board of Commissioners Meeting to approve the Annual Plan. Members of the public may participate in person, by computer, tablet, or phone. Details for accessing this meeting will be included on CRHA’s website. Individuals who need access to a printed copy of the plan may do so by emailing [matthewsk@cvilleha.com](mailto:matthewsk@cvilleha.com) or calling 434-422-9298 and asking to set up a time to view or check-out a copy of the draft. Hardcopies will be posted for public review at the CRHA Rental Offices at 1000 S 1<sup>st</sup> Street in the lower level, CRHA HCV Office at 715 6<sup>th</sup> Street SE and at the CRHA Resident Services Offices at 801 Hardy Drive. An electronic copy can be found at <https://www.cvilleha.com/key-documents/>.

Written comments will be accepted through **December 6, 2022**, and should be submitted to Kathleen Glenn-Matthews, Deputy Executive Director via email or PO Box 1405, Charlottesville VA 22902 or to [matthewsk@cvilleha.com](mailto:matthewsk@cvilleha.com).

## Public Meetings on Annual Plan

1. 11/10/22 5pm BOC Work session hybrid at Westhaven
2. 11/14 6pm PHAR Board Meeting hybrid at PHAR offices
3. 12/1/22 10am hybrid at South 1<sup>st</sup> Street Community Center
4. 12/8/22 5pm Public Hearing hybrid at Westhaven
5. 12/8/22 Resolution to BOC at special 5:45pm meeting following AP Hearing

The virtual link for all of the meetings is:

<https://us06web.zoom.us/j/82252789220?pwd=VEFhUkIpaytXQ0N3OU9HQjkzcnpKZz09>

One tap mobile: +13017158592,,82252789220#

Dial-in: +1 301 715 8592

Meeting ID: 822 5278 9220

Passcode: 549322



## Residents **FIRST!**

Residents **FIRST!** is grounded in the belief that those we serve have the knowledge, experience and power to drive the systemic change needed to sustain healthy communities and build bright futures.



CRHA does not discriminate on the basis of race, color, sex, age, religion, national origin, disability, veteran status, or union affiliations in any of its federally assisted programs and activities.



# Order Confirmation

Order# 0001375763

**Client:** CHARLOTTESVILLE REDEVELOPMENT & HOUSING  
**Phone:** 4343264748

**Payor :** CHARLOTTESVILLE REDEVELOPMENT & HOUSING  
**Phone:** 4343264748

**Account:** 6055361  
**Address:** 605 E MAIN STREET  
CHARLOTTESVILLE VA 22902

**Account:** 6055361  
**Address:** 605 E MAIN STREET  
CHARLOTTESVILLE VA 22902

**Sales Rep**      **Accnt Rep**      **Ordered By**      **Fax:**  
rguffey      rguffey      Kathleen Glenn-M      **Email:**

**Total Amount**      \$231.10

**Payment Amount**      \$0.00

**Amount Due**      \$231.10      **Tear Sheets**      **Proofs**      **Affidavits**      **PO Number:**

**Tax Amount:**      0.00      0      0      1

**Payment Meth:** Invoice - Statement

**Ad Number**      **Ad Type**      **Ad Size**      **Color**  
0001375763-01      CLS Legal Liner      2 X 22 li      \$0.00

## Production Method

AdBooker (liner)

## Production Notes

**Product and Zone**      **Placement**      **Position**      **# Inserts**  
CVL Daily Progress      C-Legal Ads      Legal Notices      1

**Run Schedule Invoice Text:** The Charlottesville Redevelopment & Housing Authority

**Run Dates**      10/24/2022

**Product and Zone**      **Placement**      **Position**      **# Inserts**  
CVL dailyprogress.com      C-Legal Ads      Legal Notices      10

**Run Schedule Invoice Text:** The Charlottesville Redevelopment & Housing Authority

**Run Dates**      10/24/2022, 10/25/2022, 10/26/2022, 10/27/2022, 10/28/2022, 10/29/2022, 10/30/2022, 10/31/2022, 11/ 1/2022, 11/ 2/2022

**TagLine:** THECHARLOTTESVILLEREDEVELOPMENTHOUSINGAUTHORITYCRHAWILLHOLDAPUBLICHEARINGREGARDINGTHEFY20232024ANNUALPLANASREQUIREDBYHUDUNDERSECTIO

## Ad Content Proof

Note: Ad size does not reflect actual ad

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### **C. Public Meetings on Annual Plan**



# Welcome!

November 10, 2022 CRHA Board of Commissioners  
(BOC) Annual Plan Work Session

## AGENDA

Quick AP refresher

Process for preparing draft

Review of draft. With focus on what is new this time.  
Followed by time for feedback and questions.

Next steps





# The Public Housing Authority (PHA) Annual Plan

Comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals.

Two parts to the PHA Plan:

1. The Five-Year Plan, which each PHA submits to HUD once every fifth PHA fiscal year and
2. The Annual Plan, which is submitted to HUD every year. It is through the Annual Plan that a PHA receives capital funding. (THAT'S WHAT WE ARE WORKING ON)

CRHA's current Five-year plan is 2019 - 2024.

CRHA's fiscal year runs April 1 - March 31<sup>st</sup>.







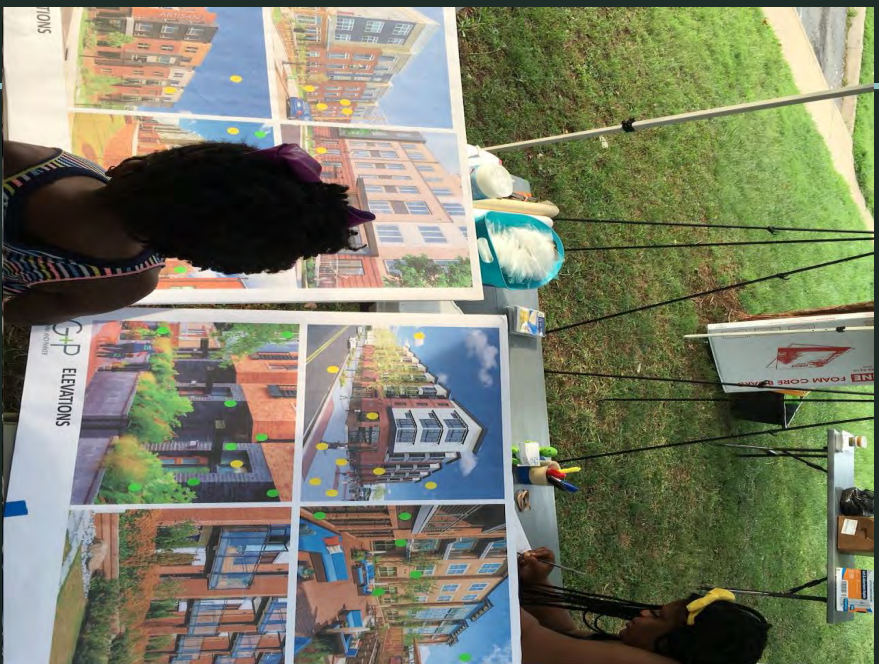
The PHA Plan Process is a step-by-step process of writing out the Plan. The housing authority has to follow each step, every year. A big part of the process is staff and resident participation.

- The annual PHA Plan process is your chance to get involved, ask questions, talk about important issues, and make your voice heard.
- You can say what you like and don't like about your neighborhood.
- It is your chance to try to change and improve the rules.
- This is an opportunity to set goals for the future.





## Process for preparing draft



1. Monthly meetings with RAB started 7.13.22. The majority of the group had been working together for several years.
2. Group decided to focus on Affirmatively Furthering Fair Housing "AFFH" training to determine best path to getting an AFFH assessment and to write for the AP.
  - Had three trainings on 7.21.22 with HUD, 8.17.22 and 9.22.22 with Mally Dreydon-Mason from DPOR. At the final meeting with Mally we talked about goal setting and many of these conversations helped shape this year's goals.
  - Asked TJPCD and City to include us when they start working on their assessment.
3. Discussed format for meetings and decided on hybrid - so will will give a choice this year of virtual or in person



## WHAT IS AFFH?

Title VIII of the Civil Rights Act of 1968, known as the Fair Housing Act, requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, which are:

- Race
- Color
- National origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial status
- Disability





## Goals

There are a lot of goals from the previous plan that are still in progress and very relevant now, so we have carried them over. Some items from last year it had been suggested the CRHA want to look at more are with some checks by items that are already being tackled:

- Safety on Public Housing Sites- cameras, improving security
- Homeownership Programs- Initial start with new Admin Plan Draft
- Rebuilding Family Self Sufficiency “FSS”
- Setting up non-profit arm so we can access more funding streams to help build more resident service opportunities,
- Focusing more on the long-term agency sustainability plan,
- Increasing the agency’s ability to do internal project management for construction projects with redevelopment and modernization

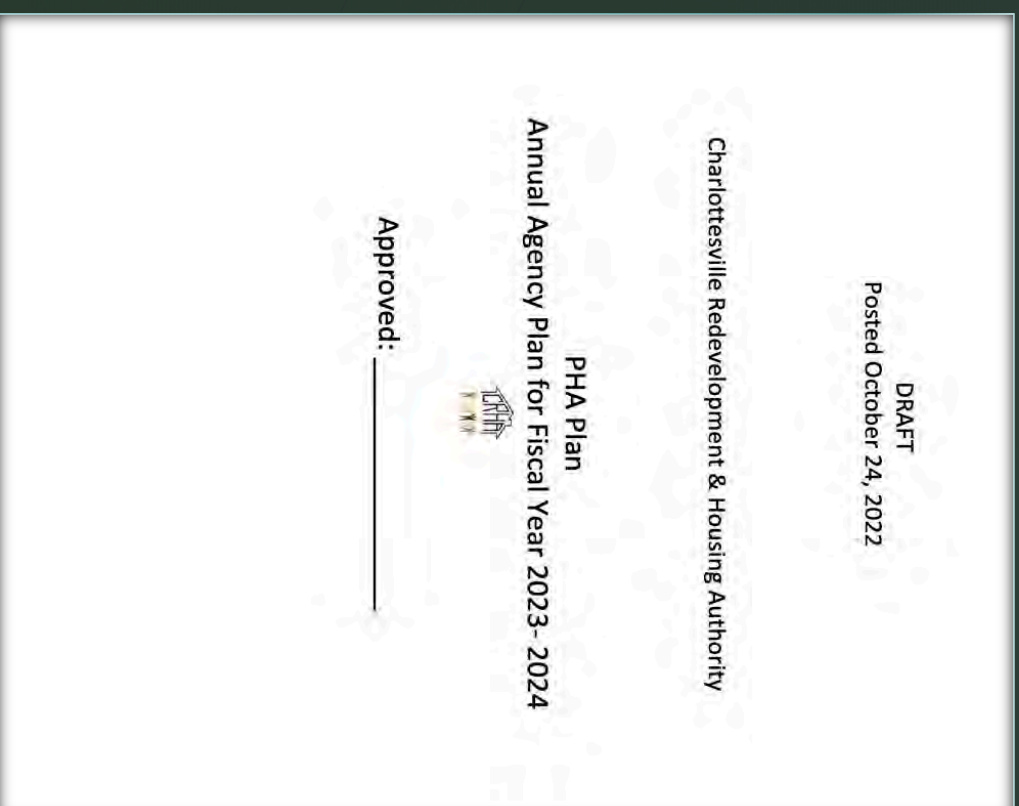


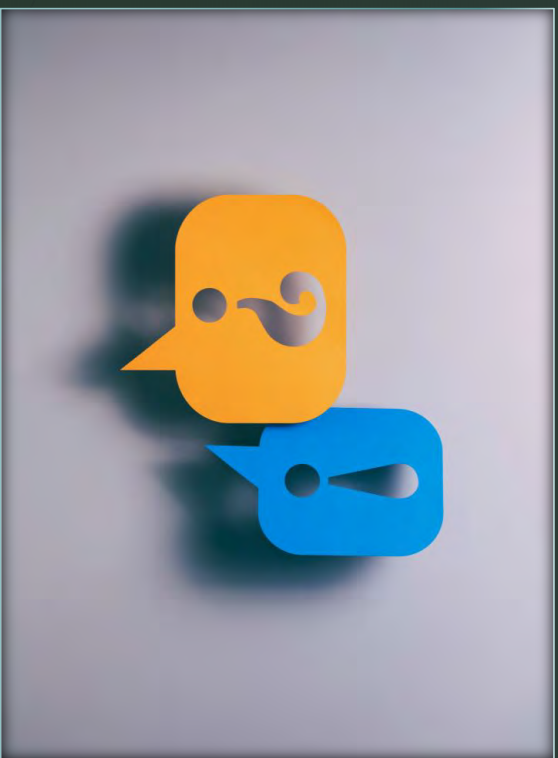
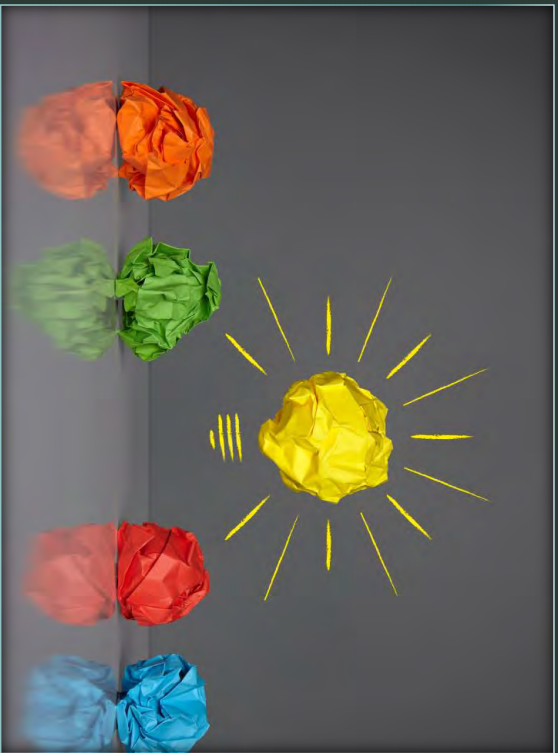


## Next Steps :

- The RAB submits comments on the Plan and the CRHA responds.
- Public Meetings on AP
- Public Hearing to review and offer final comments in December
- Board Resolution
- Entire packet sent to HUD for review and approval by 1/15/2023
- We will start all over again in February of 2023 on the Five-Year Plan!
- CRHA and stakeholders will follow up with City and TJPDC about partnership in AFFH assessment.

# Let's look at the document





Any additional comments or questions on the Annual Plan  
Draft from the CRHA Board of Commissioners?



**Thank you all so much for being  
here to work on this together!**

**If you have questions, please feel free  
to get in touch with Kathleen:**

**[matthewsk@cvilleerha.com](mailto:matthewsk@cvilleerha.com)**

**Call or text 434-987-9639**

**Charlottesville Redevelopment and Housing Authority  
Board of Commissioners Hybrid in person at the Westhaven Center and Virtual via  
Zoom Work Session  
Thursday, November 10, 2022, at 5:00 pm**

**Agenda**

- I. Call to Order  
Reading of Code § 2.2-3708.2(A)(3)  
Roll Call of Commissioners

	<b>Present</b>	<b>Absent</b>
Dr. A'lelia Henry, Chair	<b>X</b>	
Ms. Laura Goldblatt, Commissioner	<b>X</b>	
Ms. Judy Sandridge, Commissioner	<b>X</b>	
Ms. Airea Garland, Commissioner	<b>X</b>	
Ms. Brenda Wicks, Commissioner	<b>X</b>	
Dr. Wes Bellamy, Commissioner	<b>X</b>	
Michael Payne, Commissioner	<b>X</b>	

Moment of Silence

General Announcements / Meeting Dates / Reminders

-The Westhaven Resident planners were in the Community Center

**-Dr. Henry** made a reminder that the upcoming Board of Commissioner meeting is November 17<sup>th</sup>, 2022.

- II. Public Comments

- III. Annual Plan Presentation



**-Kathleen** informed that the Public Housing Authority (PHA) Plan is a comprehensive guide to public housing agency policies, programs, operations, and strategies for meeting local housing needs and goals.

-There are two parts to the PHA Plan: The first is the five-year plan, which each PHA submits to HUD once every fifth PHA fiscal year end. And the second is the Annual Plan, which is submitted to HUD every year.

-CRHA's current five-year plan is 2019-2024, and CRHA's fiscal year runs April 1-March 31.

-The PHA plan process is a step-step process of writing out the plan. The housing authority must follow each step, every year. A big part of the process is staff and resident participation.

-The RAB group decided to focus Fair Housing Act, also known as on Affirmatively Furthering Fair Housing (AFFH). Requires the recipients of HUD funds to take meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation. Which are gender identity, race, color, National organization, religion, sex, family status, and disability.

-There are a lot of Goals from the previous plan are still in progress:

- Safety on Public Housing sites (cameras, improving security)
- Rebuilding Family Self Sufficiency (FSS)
- Setting up non-profit arm to access more funding.

-Next Steps:

- Public hearing to review and offer final comments in December
- Board Resolution
- Packets sent to HUD for review and approval by 1/15/2023
- February 2023 we will start all over on the five-year plan

-The Board Packets consist of:

- Index
- Goals and Demographics
- And all the meeting are added to the document

**-Dr. Bellamy** asked what the dates for the demographics are, and **Kathleen** will get the information over to him.

**-Commissioner Sandridge** says that Kathleen has covered everything, and she had read here Plan at least 3 times and its great.

**-Dr. Henry** wants to know how these fits in with the transition from an agency that serves public housing to voucher residents, - **John Sales** states that there will not be a change in staff, and all staff are being trained in LIHTC program with public housing and vouchers. Also, the capital fund has money for training.

**-Dr. Henry** states that the Board will need training in LIHTC at some point, and **John Sales** says that is okay.

**-Commissioner Goldblatt** says if they want to provide comments on the Annual Plan what do they do, **Kathleen** informed that you could email, call, or mail comments (Information is in the Annual Plan as to the contact information)

**-Dr. Henry** asked if Kathleen will be sharing comments that others have asked/shared, **Kathleen** states that yes she will go through every single comment or change.

#### IV. Adjournment

Chair Henry called for a motion to adjourn the virtual CRHA Board meeting. Dr. Bellamy motioned to adjourn the virtual meeting of the CRHA Board of Commissioners. Commissioner Wicks seconded. Chair Henry adjourned the meeting at 6.00 p.m.

	Ayes	Nays	Absent	Abstain
Henry	x			
Goldblatt	x			
Sandridge	x			
Garland	x			
Bellamy	x			
Wicks	x			
Payne	x			

# Welcome!

November 14, 2022 Public Housing Association of  
Residents (PHAR) Annual Plan Presentation

## AGENDA

Quick AP refresher

Process for preparing draft

Review of draft. With focus on what is new this time.  
Followed by time for feedback and questions.

Next steps



# Welcome!

**December 1, 2022 Public Meeting for the CRHA  
Annual Plan Presentation hybrid at South 1st Street  
Community Center and virtual**

## **AGENDA**

QuickAP refresher

Process for preparing draft

Review of draft. With focus on what is new this time.  
Followed by time for feedback and questions.

Next steps



# **PHAR Board Meeting**

**Monday, November 14, 2022**

## **MINUTES**

### **In attendance**

**Board:** Alice Washington, Judy Sandridge, Tina Washington, Katrena Cooper, Brandon Ertel, Audrey Olliver, Harriett Carter

**Advisory Board:** Kathleen Glenn-Matthews, Bill Harris, Emily Dreyfus, Edith Good, Cheryl Klueh

**Staff:** Cam Gaillard, Jo Blount, Taylor Frome, Asia Green

**Observers:** John Sales, Moriah

**Meeting started at 6:18pm**

- 1. October meeting minutes approved (all in favor)**
- 2. Discussion of addition of 3 additional board members**
  - a. Not all seats were filled in recent election. There are 3 more at-large seats available.**
  - b. Board nominations for remaining at-large seats. No representatives from Madison or single family homes**
  - c. Audrey Olliver requests to table nomination, in order to identify potential nominees in other sites.**
- 3. Annual Plan (Kathleen)**
  - a. Presentation of PHA annual plan and upcoming 5-year plan draft–CRHA has been distributing hard copies, copies are also available at Westhaven, South 1<sup>st</sup> St and 6<sup>th</sup> street. Upcoming public hearing scheduled.**
- 4. Executive Director Report (Taylor)**
  - a. Redevelopment underway at Westhaven, Crescent Halls, 6<sup>th</sup> street, SFS**
  - b. Parallel Track meetings for smaller sites**
  - c. Internship program recruitment and upcoming alumni date and time TBA**
  - d. Meeting with CRHA regularly to discuss maintenance concerns**
  - e. Regular meetings at Midway Manor**
  - f. Successful Youth Program Fall Fest, planning for winter Youth Program**
  - g. 2 new R3 hires**
  - h. Financial updates**
    - i. Audit waiting to be complete, will have more to report next meeting**
    - ii. Submitted CDBG and Vibrant Communities grant proposals**
    - iii. Will apply for CAF funding for Youth Program**
    - iv. Winter solicitation letters will be mailed the week following Thanksgiving. Taylor will organize an envelope stuffing Nov. 21 or Nov. 22**
      - i. Staff Quarterly Report in December**
      - j. Marketing and digital media report data presented– Taylor and Jo will schedule 25<sup>th</sup> anniversary videos with board members**
- 5. Executive Director search updates– 18 applicants, 6 of whom were offered interviews. 3 interviews were conducted. Search committee is considering conducting another round of interviews and also reposting of the job listing in January. Committee will discuss next steps.**

**6. R3 Updates (Cam)**

**a. Presentation of MOU: agreement between UVA IRB and PHAR. Role of R3 representatives and referral process**

**i. Bill: question about enforcement of MOU**

**ii. Kathleen: suggestion to speak with IRB about trainings to**

**UVA professors**

**iii. Research Team MOUs (Oral History Project). R3 will ensure open access to data for community members**

**iv. Bill: question about breaking down complicated subject material. UVA could pay for technical assistance**

**v. Emily: role of R3 advisory board to meet and discuss increased accountability in Charlottesville. Could include people with a history of R3 involvement**

**vi. Audrey: supports direction that R3 is heading in, encourages feedback from other board members**

**7 Audrey: move-in date for SFS? John: October 17 for Building 2. Building 1 TCO (temporary occupancy)**

**Meeting adjourned at 7:37pm**



**CRHA FY 2023- 2024 Annual Plan Draft Public Meeting  
10am December 1, 2022**

Hybrid In person at the South First Street Community Center located at 1000 1<sup>st</sup> Street S and via  
zoom link:

<https://us06web.zoom.us/j/82252789220?pwd=VEFxUkJpaytXQ0N3OU9HQjkzcnpKZz09> One  
tap mobile: +13017158592,,82252789220# Dial-in: +1 301 715 8592  
Meeting ID: 822 5278 9220, Passcode: 549322

In Person Attendance: John Sales (CRHA), Joy Johnson (CRHA and Maria Carey (CRHA). In  
attendance via phone Moriah Wilkins (LAJC).

No public attendees came to the meeting at the center or via the zoom link.

# Welcome!

December 8, 2022 Public Hearing for the CRHA  
Annual Plan Presentation hybrid at Westhaven  
Community Center and virtual via zoom

## AGENDA

Process for preparing draft and AFFH training

Changes since draft was posted on October 24, 2022

Public Comment

Next steps





## D. Reserved for Notes from Annual Plan Hearing

### 1. Edits on the CRHA 2023- 2024 Annual Plan Draft to Finalize and in Response to Community and Board Feedback.

Date and Source	Change/Suggestion	Edit Made Y/N	CRHA Response
11.10.22	Board of Commissioners Work Session	Y	Notes inserted under public meetings
11.16.24	Received signed HUD 50077-SL from the City of Charlottesville	Y	Attachment E
11.24.22	Attached original CAPs as we did not have updated version from HUD yet.	Y	Inserted attachment B
12.1.22	Public Meeting	Y	Notes inserted under public meetings
12.7.22	Updated table of contents	Y	Updated to reflect items
12.7.22 RAB Letter	1. Goal 7-PHAR suggestion a revision of "DHS" in the Progress Notes. PHAR believes that it should say the Housing Office instead	Y	This change was made to goal 7 as requested and also on goal 14 and 17 that used the same acronym.
	2. Goal 8- PHAR suggestions a revision to a typo in the Progress Notes- it should say "coming" instead of "cling".	Y	This change was made to goal 8.
	3. Goal 12- PHAR suggestions a revision where CRHA writes out the meaning of SOPs and writes "Standards of Practice"	Y	Goal 12 was changed to add Standard Operating Procedure.
	4. Goal 18- PHAR would like the progress notes to include something about the Parallel Track and mention that CRHA and PHAR are in the planning stages		Progress notes for Goal 18 was changed to: Ongoing support for Section 3. CRHA and PHAR have conducted 20 joint Parallel track meetings to engage with the residents at the scattered sites in AMP and completed 44 door knock events to better engage on an individual approach in an attempt to hear every residents voice. Currently working to procure a firm to replace the HVAC, roof, siding and windows at Michie, Madison and Riverside.
	5. Goal 19-PHAR suggests a revision where CRHA adds the language from last year's plan if it still relevant/true, especially the portion that says: "Will	Y	This language was added to the new 2023-2024 Goal 19: Continue pursuing

	be pursuing opportunities to increase funds for soft costs”		opportunities to increase funds for soft costs.
	6. Goal 20- PHAR suggests a revision where CRHA includes the more specific language from last year. Last year it said that “CRHA PH Staff is in the community on a daily basis. Staff door knocks for flyers, visits homes to assist in collecting recertification documents, walks the property to assess damages, and visits homes to hand deliver notices.”	Y	The progress notes for Goal 20 were changed to read: CRHA continues to increase staffing. Staff is in community on a regular basis door knocking, assisting in collecting documents, assess damages and to hand deliver notices.
	7. Goal 21- PHAR suggests a revision where CRHA re-adds language about the Neighborhood Crisis intervention team like last year. Last year it said “Neighborhood Crisis intervention team has been meeting which is composed of CRHA staff and community partners.	Y	This language was added to the progress notes for goal 21: Neighborhood Crisis intervention team has been meeting which is composed of CRHA staff and community partners.
	8. Goal 32- PHAR suggestions where CRHA inserts the text from “I” in the Progress box.	Y	This change was made to the progress notes for goal 32.
12.1.22	Verbal discussion with RAB member Joy Johnson and LAJC staff Moriah Wilkens as they read through Annual Plan draft. They suggested adding work with PHAR and Safety Committee on Safety Plan and Maintenance Plan and a few other edits most of which then came in the RAB letter.	Y	Added word Ongoing under progress notes for goal 30. Added draft Maintenance under C2 and Safety as C3. CRHA also added this section under B1 of the 50075-ST: The CRHA has worked with residents and the Public Housing Association of Residents (PHAR) to draft a Maintenance Plan attachment C2 and a Safety Plan attachment C3.
12.7.22 CRHA Response to RAB comments	See above	Y	See above
12.8.22	Received notes from Annual Plan presentation at PHAR Board Meeting	Y	Notes inserted under public meetings
12.8.22	Notes from 12.8.22 Annual Plan Hearing	Y	Attached with public meetings.
12.8.22	Signed Resolution by Board of Commissioners	Y	Attachment G
12.8.22	Received signed HUD 50077-CR	Y	Attachment C
12.8.22	Received signed HUD 50077-ST-HCP-HP	Y	Attachment D
12.8.22	Received signed HUD 50071	Y	Attachment E

## **2. Notes from Public Hearing**

# Welcome!

December 8, 2022 Public Hearing for the CRHA  
Annual Plan Presentation hybrid at Westhaven  
Community Center and virtual via zoom

## AGENDA

Process for preparing draft and AFFH training

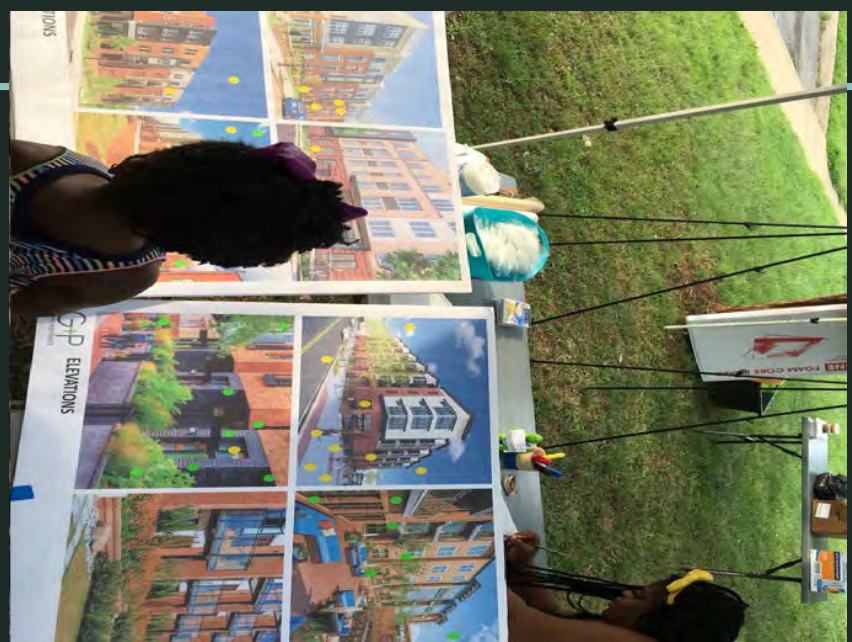
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  - Had three trainings on 7.21.22 with HUD, 8.17.22 and 9.22.22 with Mally Dreydon-Mason from DPOR. At the final meeting with Mally we talked about goal setting and many of these conversations helped shape this year's goals.
  - Asked TJPDC and City to include us when they start working on their assessment.
3. Discussed format for meetings and decided on hybrid- so will will give a choice this year of virtual or in person





## WHAT IS AFFH?

Title VIII of the Civil Rights Act of 1968, known as the [Fair Housing Act](#), requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, which are:

- Race
- Color
- National origin
- Religion
- Sex (including gender identity and sexual orientation)
- Familial status
- Disability



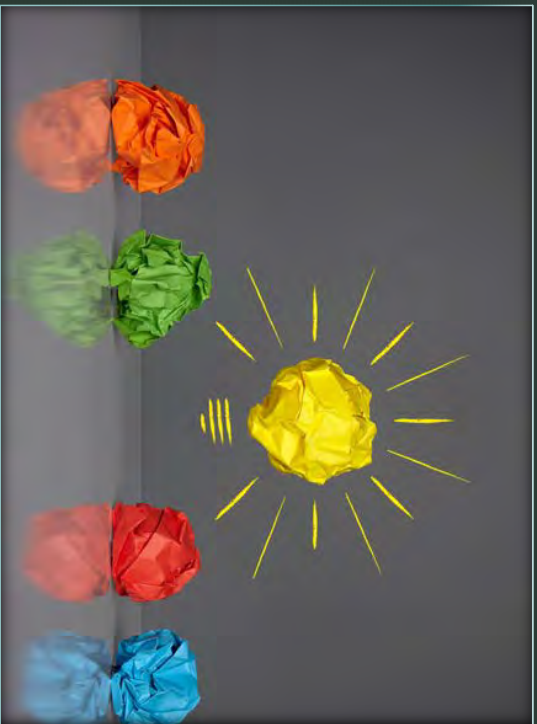
## Changes to the Draft since posting October 24, 2022

### Added:

- Public meeting minutes
- Amended FSS Action Plan (replaced original draft)
- Signed Form from City
- Copy of Recovery Agreement- HUD has not sent CRHA updated copy yet so had to post the original
- RAB Comments
- CRHA Response to RAB Comments
- Draft Maintenance Plan
- Draft Safety Plan







Any additional comments or questions on the Annual Plan?



## Next Steps :

- Public Hearing to review and offer final comments in December (what we are doing now)
- Board Resolution
- Entire packet sent to HUD for review and approval by 1/15/2023
- We will start all over again in February of 2023 on the Five-Year Plan!
- CRHA and stakeholders will follow up with City and TJPDC about partnership in AFFH assessment.



**Thank you all so much for being  
here to work on this together!**

**If you have questions, please feel free  
to get in touch with Kathleen:**

**[matthewsk@cvilleerha.com](mailto:matthewsk@cvilleerha.com)**

**Call or text 434-987-9639**



## **VI. Attachments**

**A. Statement of Capital Improvements (HUD Form 50075.2)**

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274

Status: Approved

Approval Date: 05/24/2022

Approved By: DAVENPORT, ROBERT

02/28/2022

<b>Part I: Summary</b>							
<b>PHA Name :</b> Charlottesville Redev & Housing Authority		<b>Locality (City/County &amp; State)</b> <input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revised 5-Year Plan (Revision No:      )					
<b>PHA Number:</b> VA016							
<b>A.</b>	<b>Development Number and Name</b>	<b>Work Statement for Year 1    2022</b>	<b>Work Statement for Year 2    2023</b>	<b>Work Statement for Year 3    2024</b>	<b>Work Statement for Year 4    2025</b>	<b>Work Statement for Year 5    2026</b>	
	SCATTERED SITES (VA016000004)	\$886,826.75	\$258,488.00	\$593,488.00	\$666,747.00	\$595,686.00	
	AUTHORITY-WIDE	\$186,061.00	\$192,122.00	\$192,122.00	\$102,576.00	\$173,637.00	
	WESTHAVEN (VA016000001)	\$312,629.25	\$240,154.00	\$240,154.00	\$256,441.00	\$256,441.00	

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1		2022		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	SCATTERED SITES (VA016000004)			\$886,826.75
ID0104	Playground Equipment Upgrade(Non-Dwelling Site Work (1480)-Playground Areas - Equipment)	Replace playground equipment, benches and playground surface (as needed).		\$135,000.00
ID0068	HVAC Replacement(Dwelling Unit-Interior (1480)-Mechanical)	Replace HVAC system to include the addition of cooling system.		\$301,826.75
ID0100	Window & Door Replacement(Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Windows)	Replace all windows, exterior entry doors and screen doors. Install canopies/ awnings over the front exterior door.		\$450,000.00
	AUTHORITY-WIDE (NAWASD)			\$186,061.00
ID0005	Administration/Administration (1410)-Other	CFP Management Fee - 10%		\$125,000.00
ID0102	Career Training Opportunities (Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other)	The funding will be used to train public housing residents in order to gain a pool of residents that are prepared to take advantage of career opportunities as CRHA redevelops its public housing communities.The programs will improve the empowerment and economic self-sufficiency of public housing residents through job readiness programs and business creation/ development programs.		\$61,061.00



Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		1	2022	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
	WESTHAVEN (VA016000001)			
ID0077	Operations(Operations (1406))	AMP Operations		
	Subtotal of Estimated Cost			
				\$312,629.25
				\$312,629.25
				\$1,385,517.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		2	2023	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
	AUTHORITY-WIDE (NAWASD)			
ID0058	Administration/Administration (1410)-Other/Administration (1410)-Salaries)	CFP Management Fee - 10%		\$192,122.00
ID0062	Staff Training(Management Improvement (1408)-Staff Training)	Train of areas noted in audit		\$40,000.00
ID0101	Career Training Opportunities (Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Other, Management Improvement (1408)-Empowerment Activities)	The funding will be used to train public housing residents in order to gain a pool of residents that are prepared to take advantage of career opportunities as CRHA redevelops its public housing communities. The programs will improve the empowerment and economic self-sufficiency of public housing residents through job readiness programs and business creation/ development programs.		\$56,061.00
	WESTHAVEN (VA016000001)			\$240,154.00
ID0078	Operations(Operations (1406))	AMP Operations		\$240,154.00
	SCATTERED SITES (VA016000004)			\$258,488.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		2	2023	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
ID0105	Bathroom Modernization(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Replace bathroom vanities, commodes, flooring, lighting, exhaust, install shower surround, replace bathroom fixtures and prep n paint.		\$233,488.00
ID0106	Relocation for Modernization(Contract Administration (1480)-Relocation)	Temporary relocation for modernization of bathrooms.		\$25,000.00
	Subtotal of Estimated Cost			\$690,764.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		3	2024	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
	WESTHAVEN (VA016000001)			
ID0079	Operations(Operations (1406))	AMP Operations		\$240,154.00
	AUTHORITY-WIDE (NAWASD)			\$192,122.00
ID0080	Administration(Administration (1410)-Other)	CFP Management Fee - 10%		\$96,061.00
ID0081	Staff Training(Management Improvement (1408)-Staff Training)	Train of areas noted in audit		\$25,000.00
ID0103	Career Training Opportunities (Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other)	The funding will be used to train public housing residents in order to gain a pool of residents that are prepared to take advantage of career opportunities as CRHA redevelops its public housing communities.The programs will improve the empowerment and economic self-sufficiency of public housing residents through job readiness programs and business creation/ development programs.		\$71,061.00
	SCATTERED SITES (VA016000004)			\$593,488.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		3	2024	
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0083	Kitchen Modernization(Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets)	Replacement of kitchen appliances, cabinets, countertop, kitchen sink, kitchen faucet, kitchen lighting, flooring, prep and paint		\$538,865.20
ID0084	Modernization Relocation(Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Contract Administration( 1480)-Relocation)	Temporary relocation of residents to complete kitchen modernization in all units. We are currently estimating relocating each household for 4 days.		\$54,622.80
	Subtotal of Estimated Cost			\$1,025,764.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		4	2025	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
	WESTHAVEN (VA016000001)			
ID0086	Operations(Operations (1406))	Operations transfer		\$256,441.00
	AUTHORITY-WIDE (NAWASD)			\$102,576.00
ID0088	Administration(Administration (1410)-Other,Administration (1410)-Salaries)	CFP Management Fee		\$102,576.00
	SCATTERED SITES (VA016000004)			\$666,747.00
ID0096	Replace Interior Doors(Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Other)	Replace all interior doors to include closet doors and hardware.		\$126,342.00
ID0107	Modernization Relocation(Contract Administration (1480)-Relocation,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment- System)	Temporary relocation of residents to complete kitchen modernization in all units. We are currently estimating relocating each household for 7 days.		\$82,500.00



Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		4	2025	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
ID0108	Interior Painting(Dwelling Unit-Interior (1480)-Interior Painting (non routine))	Prepare and paint the interior of all public housing units to include all trim and doors.		\$105,000.00
ID0109	Flooring Replacement(Dwelling Unit-Interior (1480)-Flooring (non routine))	Replace all VCT tiles with LVP floor.		\$352,905.00
	Subtotal of Estimated Cost			\$1,025,764.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		5	2026	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
	WESTHAVEN (VA016000001)			
ID0097	Operations(Operations (1406))	Public housing operational funds		\$256,441.00
	AUTHORITY-WIDE (NAWASD)			
ID0098	Administration(Administration (1410)-Salaries,Administration (1410)-Other)	CFP Management Fee		\$102,576.00
ID0110	Career Training Opportunities (Management Improvement (1408)-Empowerment Activities,Management Improvement (1408)-Equal Opportunity,Management Improvement (1408)-Other)	The funding will be used to train public housing residents in order to gain a pool of residents that are prepared to take advantage of career opportunities as CRHA redevelops its public housing communities.The programs will improve the empowerment and economic self-sufficiency of public housing residents through job readiness programs and business creation/ development programs.		\$71,061.00
	SCATTERED SITES (VA016000004)			
ID0111	Hot Water Tank Replacement(Dwelling Unit-Interior (1480)-Plumbing)	Replace hot water tank in all public housing units.		\$115,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		5	2026	
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity
ID0112	Parking Lot(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving,Non-Dwelling Site Work (1480)-Curb and Gutter)	Mill, pave and stripe all parkings lots in AMP.		\$350,000.00
ID0113	Site Lighting(Non-Dwelling Site Work (1480)-Lighting)	Replace all exterior site lights.		\$130,686.00
	Subtotal of Estimated Cost			\$1,025,764.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	1	2022
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Administration (Administration (1410)-Other)		\$125,000.00
Career Training Opportunities (Management Improvement (1408)-Empowerment Activities, Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Other)		\$61,061.00
Subtotal of Estimated Cost		\$186,061.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	2	2023
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Administration (Administration (1410)-Other, Administration (1410)-Salaries)		\$96,061.00
Staff Training (Management Improvement (1408)-Staff Training)		\$40,000.00
Career Training Opportunities (Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Empowerment Activities)		\$56,061.00
Subtotal of Estimated Cost		\$192,122.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	3	2024
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Administration(Administration (1410)-Other)		\$96,061.00
Staff Training(Management Improvement (1408)-Staff Training)		\$25,000.00
Career Training Opportunities (Management Improvement (1408)-Empowerment Activities, Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Other)		\$71,061.00
Subtotal of Estimated Cost		\$192,122.00



Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	4	2025
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Administration(Administration (1410)-Other,Administration (1410)-Salaries)		\$102,576.00
Subtotal of Estimated Cost		\$102,576.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)		
Work Statement for Year	5	2026
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Administration (Administration (1410)-Salaries, Administration (1410)-Other)		\$102,576.00
Career Training Opportunities (Management Improvement (1408)-Empowerment Activities, Management Improvement (1408)-Equal Opportunity, Management Improvement (1408)-Other)		\$71,061.00
Subtotal of Estimated Cost		\$173,637.00

B.

**Recovery Agreement between**  
**Charlottesville Redevelopment and Housing Authority**  
**And**  
**the United States Department of Housing and Urban Development**  
**And**  
**the City of Charlottesville**

This Recovery Agreement is entered into between the Charlottesville RHA, the UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT ("HUD") and the City of Charlottesville as of this 6<sup>th</sup> day of November, 2020.

**RECITALS**

**WHEREAS**, under the United States Housing Act of 1937, as amended, ("Act"), 42 U.S.C. § 1437 *et seq.*, the United States Department of Housing and Urban Development ("HUD") is responsible for administering low income housing programs, and pursuant to the Act, HUD has entered into an Annual Contributions Contract ("ACC") with the Charlottesville RHA to develop and operate public housing projects of the Charlottesville RHA; and

**WHEREAS**, pursuant to the Act, HUD must evaluate public housing performance and has instituted the Public Housing Assessment System ("PHAS"); and

**WHEREAS**, on the basis of an annual PHAS score, the Charlottesville RHA has been designated Troubled or Substandard for financial, physical and/or management indicators, or other such deficiencies as HUD has identified; and

**WHEREAS**, the Act requires HUD to enter into agreements that establish performance targets, set out strategies for meeting targets, provide for incentives and sanctions for effective implementation of the strategies leading to recovery of performance and attain an improved status of at least a Standard Performer; and

**WHEREAS**, the recovery of performance is intended to lead to a sustainable sound fiscal management and good governance; and

**WHEREAS**, the parties desire to correct all HUD-identified deficiencies through the implementation of this Recovery Agreement, ("Agreement");

**NOW THEREFORE**, in consideration of the mutual covenants and agreements herein contained, HUD, the Charlottesville RHA and the City of Charlottesville agree as follows:

- I. The Charlottesville RHA agrees to achieve the outcomes outlined in the Action Plan and incorporated into this Agreement as Exhibit A.
- II. The Charlottesville RHA and the City of Charlottesville agree to work together to develop and implement a Sustainability Plan if necessary to achieve recovery.
- III. The Action Plan describes the results following HUD's review and assessments of PHA performance, the measures that need to be implemented to improve the performance and the desired outcomes to be achieved and establishes a timetable to achieve those outcomes. The

Action Plan also identifies the available remedies to resolve HUD's determination of non-performance.

- IV. Upon execution of the Agreement, the Charlottesville RHA will commence with the required actions listed in the Plan within the timeframes set forth therein.
- V. The Charlottesville RHA will cure identified deficiencies within the timeframes established in the Action Plan.
- VI. Subject to section XII, regardless of possible changes in the Charlottesville RHA's Board composition, or the decision-making individuals for HUD or the City of Charlottesville, the term of this Agreement is effective as of the execution date of this document and will continue until completion of the Action Plan in accordance with 6(j) (2) and (3) of the Act, and any agreed upon extensions. This Agreement will remain in effect until the Charlottesville RHA has completed all items listed in the Plan, even if HUD removes the Charlottesville RHA's troubled/substandard designation.
- VII. HUD, in its discretion, may provide technical assistance, including training or contract support, to the Charlottesville RHA to facilitate accomplishment of the items in the Action Plan. The Charlottesville RHA's compliance with the Action Plan, however, shall not be contingent on HUD's provision of any technical assistance or other discretionary assistance.
- VIII. The Charlottesville RHA shall provide HUD with written progress reports as identified in the Action Plan. The report shall detail the Charlottesville RHA's progress towards the completion of the items required by the Action Plan. The reports shall identify those items that have been completed and provide any necessary documentation to support this determination.
- IX. HUD will review the Action Plan progress reports submitted by the Charlottesville RHA and supporting documentation. HUD will confirm in writing to the Charlottesville RHA the items that HUD determines to have been successfully completed, those that require additional documentation and those that are past due.
- X. If the Charlottesville RHA disagrees with HUD's determination concerning the completion of any item, the Charlottesville RHA may request a reconsideration of the determination and submit additional information to support its position. HUD will provide the Charlottesville RHA with a written notice of its decision.
- XI. The failure of the Charlottesville RHA, its employees, officers, agents, or contractors to comply with this Agreement, including the failure to achieve the agreed-upon outcomes or to take the actions or comply with the time frame set forth in the Action Plan, may result in HUD seeking any available remedies, including any of the following actions sequentially or simultaneously:
  - a. Consolidation;
  - b. Consortia/Joint Venture;
  - c. Contraction of Operational Activities;
  - d. Cooperative Endeavor Agreement;

- e. Debarment;
  - f. Deliver possession and control of project(s) to HUD;
  - g. Limited Denial of Participation;
  - h. Receivership; and/or
  - i. Suspension.
- XII. The parties by mutual written agreement may agree to extend the timeframes set forth in the Action Plan from time to time. In the event said timeframes are extended, HUD agrees that it will not take any of the actions against the Charlottesville RHA as set forth in this section of the Agreement for noncompliance with original timeframes.
- XIII. Communication related to the Recovery Agreement and Action Plan shall be provided to the Public Housing Director and the HUD Recovery Team leader, if applicable.
- XIV. HUD, the Charlottesville RHA and their employees, subcontractors, partners or assigns, and the City of Charlottesville shall comply with all applicable federal, state, and local laws and regulations relating to the performance of this Agreement to which their activities are subject.
- XV. Notwithstanding any provisions of this Agreement to the contrary, the parties shall not be held liable for any failure or delay in the performance of this Agreement that arises from fires, floods, strikes, embargoes, acts of the public enemy, unusually severe weather, outbreak of war, riots, civil commotion, force majeure, acts of God, or for any other cause of same character which is unavoidable through the exercise of due care and beyond the control of the parties, provided that said failure or delay in the performance of this Agreement attributed to any of the events described herein is acknowledged in writing by HUD. Upon the issuance of HUD's written acknowledgement, the failure to perform shall be deemed excused during the continuance of such circumstances as determined by HUD, but this Agreement shall otherwise remain in effect.
- XVI. In the event of any conflict between terms in this Agreement, including all exhibits, attachments and all other documents specifically incorporated by reference, and HUD's applicable Public Housing requirements including, but not limited to, the Act, HUD regulations there under (and, to the extent applicable, any HUD-approved waivers of regulatory requirements), the ACC, HUD notices, the HUD-approved Declaration of Trust or Declaration of Restrictive Covenants in favor of HUD, and all applicable Federal statutory, executive order and regulatory requirements, as those requirements may be amended from time to time, the applicable Public Housing requirements shall prevail. HUD reserves the right to resolve any conflict.
- XVII. Any modification or amendment of any condition or provision in this Agreement by either party will not imply or constitute a further modification or amendment of the same or any other condition or provision, nor shall it relieve the parties from performing any subsequent obligations strictly in accordance with the term of this Agreement. No modification or amendment shall be effective unless in writing and signed by the party against whom enforcement is sought. Such modification or amendment shall be limited to provisions of this Agreement specifically referred to therein and shall not be deemed a modification or amendment of any other provision. No modification or amendment of this Agreement shall constitute a HUD-approved waiver of regulatory requirements.

- XVIII. Should any term or provision of this Agreement be held, to any extent invalid or unenforceable, as against any person, entity or circumstance during the term hereof, by force of any statute, law, or ruling of any forum of competent jurisdiction, such invalidity shall not affect any other term or provision of this Agreement to the extent that the Agreement shall remain operable, enforceable and in full force and effect to the extent permitted by law.
- XIX. To the extent authorized by the Act and HUD regulations, HUD can unilaterally amend this Agreement. Otherwise, this agreement may be amended by mutual agreement of the parties.
- XX. This Agreement states the entire understanding and agreement between the parties and supersedes any and all written or oral representations, statements, negotiations, or agreements previously existing between the parties with respect to the subject matter of this Agreement. However, this Agreement does not supersede, modify or amend the ACC as further described in Paragraph XXII. The parties recognize that any representations, statements or negotiations made by the staff of either party does not suffice to legally bind either party in a contractual relationship unless they have been reduced to writing and signed by their authorized representative(s). This Agreement shall inure to the benefit of and shall be binding upon the parties, their respective assigns, and successors in interest.
- XXI. This Agreement may be executed and delivered in separate counterparts, which, when so executed and delivered, shall be deemed an original.
- XXII. This Agreement does not supersede, modify or amend the ACC between HUD and the Charlottesville RHA, or in any way excuse the Charlottesville RHA from complying fully with its obligations under the ACC. HUD does not waive its statutory, regulatory or contractual rights. Nothing contained in this Agreement shall serve to limit, modify or preclude HUD's right to take any remedial action allowed by the ACC or any provision of the Act or related regulations. Nothing contained in this Agreement shall serve to limit, modify or preclude HUD or the Charlottesville RHA's right to take any remedial action allowed by the Agreement.
- XXIII. The parties agree that any cost associated with the implementation of this Agreement, the Action Plan and the Sustainability Plan shall be their individual responsibility unless specifically agreed in writing between the parties.
- XXIV. The City of Charlottesville, through its Appointing Authority, acknowledges the importance of effective governance as part of the recovery and sustainability of the Charlottesville RHA. As a signatory of this Agreement, the City of Charlottesville commits to monitor the duly appointed Commissioners, the appointees to the Charlottesville RHA Governing Board, in the discharge of their duties. Upon the discovery of any failure of the Charlottesville RHA Board to discharge its duties under this Agreement, the City of Charlottesville shall work with HUD to ensure compliance with the terms of this Agreement. Such assistance from the City of Charlottesville shall not obligate it to assume any financial obligations of the Charlottesville RHA under the terms of the ACC.

IN WITNESS WHEREOF, the parties or their duly authorized representatives hereby execute this Agreement on the date first written above.


[signature page follows]

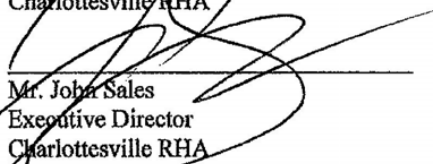


UNITED STATES DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT

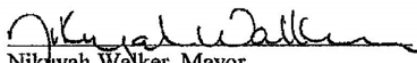
By:   
Mr. Robert Davenport  
Public Housing Director  
Richmond Field Office

**CRHA  
ATTEST: BY ITS BOARD OF  
COMMISSIONERS**

By:   
Ms. Betsy Roettger  
Board Chair  
Charlottesville RHA

By:   
Mr. John Sales  
Executive Director  
Charlottesville RHA

**CITY OF CHARLOTTESVILLE,**  
Approved by Resolution of Its City Council

By:   
Nikayah Walker, Mayor

## C. Civil Rights Certification

### Civil Rights Certification (Qualified PHAs)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB Approval No. 2577-0226  
Expires 3/31/2024

## Civil Rights Certification

### Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning April 1, 2023 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

Charlottesville Redevelopment & Housing Authority  
PHA Name

VA016  
PHA Number/HA Code

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

Name of Executive Director: John M. Sales

Name of Board Chairperson: Dr. A'Lelia Henry

Signature

Date 12/9/2022

Signature

Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 *et seq.*, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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# Charlottesville Redevelopment & Housing Authority

## FSS Action Plan for the Family Self-Sufficiency Program

Drafted September 30, 2022

Amended November 7, 2022

**Approved November 28, 2022**

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From:



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## **ABOUT THIS ACTION PLAN**

### **ORGANIZATION**

This Model FSS Action Plan contains both mandatory and discretionary guidance in informing Family Self-Sufficiency program policy and is organized to reflect that distinction. For each topic, the plan provides a description of the applicable HUD requirements, including citations of mandatory references. These mandatory references are clearly delineated on the left side of the document's margin as non-indented text and as such are not meant to be modified. PHA policy that is applicable to that topic immediately follows the description of regulatory program requirements, is distinctly marked as "PHA Policy," and is indented from the main text. The policies are based on HUD guidance whenever possible, thereby making them "safe harbor." PHAs may modify text marked as "PHA Policy" in accordance with HUD requirements but must exercise caution in doing so. For this reason, the Model FSS Action Plan comes with a separate instruction document for reference that serves as a guide for PHAs who wish to modify text marked as "PHA Policy" while remaining in compliance.

**CRHA FSS Action Plan  
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## **Chapter 1**

### **THE FAMILY SELF-SUFFICIENCY PROGRAM AND THE FSS ACTION PLAN**

#### **INTRODUCTION**

This chapter provides an overview of the family self-sufficiency (FSS) program and FSS action plan, including the purpose, organization, and required contents of the FSS action plan.

Part I: The Family Self-Sufficiency (FSS) Program and FSS Action Plan: This part provides an overview of the family self-sufficiency program and the purpose of the FSS action plan.

Part II: Requirements of the FSS Action Plan: This part covers action plan requirements, including development, revision, and contents of the action plan. It also contains information on family demographics, which is part of the required contents of the action plan.

#### **PART I: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN**

##### **1-I.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM**

The origins of the FSS program are in two pilot projects implemented in 1986 and 1990, Project Self-Sufficiency and Operation Bootstrap, respectively. These projects were set up to test self-sufficiency programs for families with housing subsidies, and both demonstrated that families needed essential services to move toward economic self-sufficiency. These services include child care, transportation, medical care, and long-term education and training.

In the wake of the successful demonstration of these projects, family self-sufficiency became one of the initiatives under the Homeownership and Housing Opportunities for People Everywhere (HOPE) program enacted in 1990, and the FSS program was subsequently created under the National Affordable Housing Act the same year.

FSS built upon and refined both Project Self-Sufficiency and the Bootstrap program. It remained a voluntary program in 1991 and 1992 but became mandatory in 1993 for any new increments of funding issued to PHAs. The 1993 regulations were further modified by the Quality Housing and Work Responsibility Act of 1998 (QHWRA). In 2018, expansive changes were made to the FSS program by the Economic Growth, Regulatory Relief, and Consumer Protection Act known as “the Economic Growth Act” or “the Act.”

The purpose of the FSS program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The purpose and basic requirements of the FSS program are further elaborated upon in Chapter 2.

This family self-sufficiency program is administered by the Charlottesville Redevelopment & Housing Authority “CRHA” for the jurisdiction of City of Charlottesville and for CRHA voucher participants in surrounding counties.

## **1-I.B. APPLICABLE REGULATIONS**

Applicable regulations for HCV and public housing FSS programs include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 902: Public Housing Assessment System
- 24 CFR Part 903: Public Housing Agency Plans
- 24 CFR Part 945: Designated Housing
- 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- 24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions
- 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- 24 CFR Part 982: HCV Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 984: HCV and Public Housing Family Self-Sufficiency Program

## **1-I.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN**

The family self-sufficiency (FSS) action plan is required by HUD. The purpose of the FSS action plan is to establish policies for conducting the family self-sufficiency program in a manner consistent with HUD requirements and local goals and objectives contained in the PHA's Agency Plan. This FSS action plan is a supporting document to the PHA Agency Plan and is available for public review as required by 24 CFR Part 903.

This family self-sufficiency action plan is set forth to define the PHA's local policies for operation of the program in the context of federal laws and regulations. All issues related to FSS not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this FSS action plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the FSS program. If such changes conflict with this plan, HUD regulations will take precedence.

Administration of the FSS program and the functions and responsibilities of PHA staff shall comply with the PHA's personnel policy and HUD's family self-sufficiency regulations, as well as all HCV and public housing regulations, in addition to federal, state, and local fair housing laws and regulations.

## **PART II: REQUIREMENTS OF THE FSS ACTION PLAN**

### **1-II.A. OVERVIEW**

A PHA must have a HUD-approved action plan before implementing an FSS program, regardless of whether the FSS program is a mandatory or voluntary program. Further, this action plan must comply with the requirements specified for the plan in the regulations [24 CFR 984.201(a)].

The regulatory requirements dealing specifically with the FSS action plan itself largely involve the development, revision, and required contents of the action plan. This part covers those requirements.

### **1-II.B. HUD APPROACH TO POLICY DEVELOPMENT**

In developing policy for the FSS action plan, PHAs need to be aware of the distinction HUD makes between mandatory and discretionary policies.

- *Mandatory policies* are those driven by legislation, regulations, current handbooks, notices, and legal opinions.
- *Discretionary policies* consist of those developed for areas in which the PHA has regulatory discretion, or regarding optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies the PHA has adopted. The PHA's FSS action plan is the foundation of those policies and procedures for the FSS program. HUD's directions require PHAs to make policy choices that provide guidance to staff and consistency to program applicants and participants.

Following HUD guidance, even though it is not mandatory, provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully consider those decisions.

### **1-II.C. FSS ACTION PLAN DEVELOPMENT AND REVISION**

#### **Development of Action Plan [24 CFR 984.201(b) and (c)]**

When developing an FSS action plan, a PHA must do so in consultation with the chief executive officer of the applicable unit of general local government and the program coordinating committee (PCC).

For all voluntary or mandatory FSS programs, the PHA must submit its action plan and obtain HUD approval of the plan before it can implement the FSS program. This includes a voluntary program established because the PHA chose to implement an FSS program that exceeds the minimum size for a mandatory program (see Section 2-II.A. for a discussion of mandatory versus voluntary FSS programs).

#### **Single Action Plan [24 CFR 984.201(f)]**

PHAs implementing both a HCV FSS program and a public or Indian housing FSS program may submit one action plan. In cases where the PHA decides to submit one plan for more than one program, the policies contained in the action plan would apply to both programs.

#### PHA Policy

The PHA is implementing both a public housing and HCV FSS program, which may include tenant-based and project-based HCV, HCV Homeownership, Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, Family Unification

Program (FUP), and Foster Youth to Independence Initiative (FYI). The PHA will submit one action plan, the policies which apply to both programs.

### **Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]**

Following HUD's initial approval of the action plan, no further approval of the action plan is required unless the PHA proposes to make policy changes to the action plan, increase the size of a voluntary program, or revise the FSS action plan as needed to comply with changes in HUD regulations. The PHA must submit any changes to the action plan to HUD for approval.

#### PHA Policy

The PHA will review and update the action plan at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

### **1-II.D. CONTENTS OF THE PLAN [24CFR 984.201(d)]**

HUD regulations state that there are several components that must be included in the FSS action plan. At a minimum, the action plan must cover the policies and procedures of the PHA for operation of a local FSS program as follows:

- Family demographics, including a description of the number, size, characteristics, and other demographics such as racial and ethnic data, in addition to the supportive service needs of the families expected to participate in the program. (Chapter 1)
- Estimate of participating families, which means the number of families which can reasonably be expected to receive supportive services under the FSS program. (Chapter 2)
- Eligible families from any other local self-sufficiency program who are expected to agree to executing an FSS contract of participation. (Chapter 2)
- A statement of the PHA's FSS family selection procedures, including a description of how the procedures ensure that families are selected without regard to race, color, religion, disability, sex, familial status, or national origin. (Chapter 4)
- A description of the incentives that the PHA intends to offer to families to encourage participation in the FSS program (an incentives plan), including the establishment of the escrow account. (Chapter 4)
- Outreach efforts, which include a description of the PHA's efforts to recruit eligible families, the actions the PHA will take to ensure that both minority and nonminority groups are informed about the FSS program, and how the PHA will make this information known. (Chapter 4)
- A description of the FSS activities and supportive services to be provided by both public and private resources to FSS families, and identification of these public and private resources. (Chapter 4)
- A description of the PHA's method for identifying family support needs, including how the PHA will identify the needs and deliver the services. (Chapter 4)

- A description of the PHA's policies regarding program termination or withholding of services based on a family's failure to comply with the FSS contract, and available grievance procedures. (Chapter 5)
- Assurances of noninterference with rights of non-participating families which state that a family's election to not participate in the FSS program will not affect the family's admission to the HCV or public housing program, nor will it affect their right to occupancy in accordance with its lease. (Chapter 4)
- A timetable for implementation of the FSS program, including the schedule for filling FSS slots with eligible FSS families. (Chapter 2)
- A certification that development of the services and activities under the FSS program has been coordinated with programs under Title I of the Workforce Innovation and Opportunity Act, other relevant employment, childcare, transportation, training, education, and financial empowerment programs in the area, and will continue to be coordinated to avoid duplication of services and activities.

**Optional Additional Information [24 CFR 984.201(d)(13)].**

- HUD encourages additional information in the action plan that would help to determine the soundness of the PHAs proposed FSS program.

PHA Policy

The PHA will submit additional optional information in this action plan that will help HUD determine the soundness of the proposed FSS program.

This information includes:

Policies related to the modification of goals in the ITSP. (Chapter 5)

Policies on the circumstances in which an extension of the contract of participation may be granted. (Chapter 5)

Policies on the interim disbursement of escrow, including any limitations on the use of the funds. (Chapter 6)

Policies regarding eligible uses of forfeited escrow funds by families in good standing. (Chapter 6)

Policies regarding the re-enrollment of previous FSS participants, including graduates and those who exited the program without graduating. (Chapter 4)

Policies on requirements for documentation for goal completion. (Chapter 4)

Policies on documentation of the household's designation of the "head of FSS family." (Chapter 4)

Policies for providing an FSS selection preference for porting families if the PHA elects to offer such a preference. (Chapter 7)

### 1-II.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

As part of the required contents of the FSS action plan, family demographics of the HCV and public housing program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants). This data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

#### PHA Policy

<b>HCV and Public Housing</b>	<b>Total PH Families</b>	<b>Percentage of PH Total</b>	<b>Total HCV Families</b>	<b>Percent of HCV Total</b>
<b>All Families</b>	<b>254</b>		<b>444</b>	
Single			204	46%
Female HOH	121	48%	355	80%
Male HOH			89	20%
<b>Race</b>				
White	46	18%	85	19%
Black/African American	197	78%	342	77%
American Indian/Alaska Native	0	0%	1	<1%
Asian	8	3%	4	1%
Native Hawaiian/Other Pacific Islander	0	0%	1	<1%
<b>Ethnicity</b>				
Hispanic or Latino	3	1%	7	2%
Not Hispanic or Latino	251	99%	430	97%
<b>Income</b>				
Extremely Low-Income	180	71%	286	64%
Very Low-Income	42	17%	89	20%
Low-Income	11	4%	10	2%
HOH Income from Wages	81 Total	32%	178	40%
Other Member Income from Wages	36 Total	14%		
HOH Income from TANF	36 Total	14%	30	7%
Other Member Income from TANF				
HOH Income from SSI	97 Total	38%	225	51%
Other Member Income from SSI				

<b>Number of Children</b>	<b>362</b>		<b>438</b>	
0	106	29%	238	5%
1-2	148 (1 or more)	41%	142	32%
3-4			54	12%
5 or more			4	<1%
<b>Total Number of Family Members</b>	<b>714</b>		<b>913</b>	
1-2	124	17%	300	33%
3-4	91	13%	106	12%
5 or more	39	5%	31	3%
<b>Persons with Disabilities</b>				
HOH Person w/ Disabilities (HUD)			172	19%
Family Members w/ Disabilities				



## Chapter 2

### PURPOSE, SCOPE, AND APPLICABILITY OF THE FAMILY SELF-SUFFICIENCY PROGRAM

#### INTRODUCTION

This chapter contains information about the FSS program's purpose, size, and measurable objectives as well as information on program operation. This includes potential participant demographics, the program timetable, the number of families to be served, and the size of the PHA's voluntary FSS program. This chapter also contains definitions of the key terms in this FSS action plan.

Part I: The Purpose and Basic Requirements of the FSS program: This part includes a description of the purpose of the FSS program on a national level—its intent, goal, and major strategies.

Part II: The Scope of the FSS program: This part contains information about housing assistance programs eligible to participate in FSS, the size of the PHA's FSS program, an estimate of participating families, eligible families from other self-sufficiency programs, and eligibility for combined FSS programs.

Part III: Program Operation: This part specifies the requirements for FSS program operation, including voluntary FSS program implementation.

Part IV: The Definitions of Terms Used in the PHA's FSS program: This section contains both HUD and PHA definitions for terms used in this policy document.

#### PART I: PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM

##### 2-I.A. PURPOSE

The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of HCV and public housing assistance programs with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].

In addition to this broader national goal of the FSS program, the PHA also establishes a local goal consistent with the PHA's mission statement to serve as a guide for establishing policy and implementing the FSS program.

##### PHA Policy

The PHA's local goal in operating this FSS program is to match housing-assisted families with a broad range of highly collaborative existing community services to assist FSS families in achieving economic self-sufficiency. *Economic self-sufficiency* is defined as having the sustainable skills necessary to maintain employment paying a "living wage." This wage would pay for the family's basic needs without the use of government subsidies.

##### 2-I.B. PROGRAM OBJECTIVES [24 CFR 984.102]

In order to reach the FSS national program goal, HUD has defined its FSS program objective as to reduce the dependency of low-income families on welfare assistance and on housing subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance while living in assisted housing so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency. As with the goals of the program, FSS program objectives are defined on the national level through FSS regulation, and on the local level by PHA policy.

#### PHA Policy

On the local level, the PHA will achieve the national program objective by offering low-income families a broad range of services through partnering with the program coordinating committee (PCC). These services will provide long-term education, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section 2-I.A. of this document.

### **2-I.C. BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104]**

An FSS program established under 24 CFR Part 984 must operate in conformity with the regulations and this FSS action plan (as required in 24 CFR 984.201, provide comprehensive supportive services as defined in 24 CFR 984.103, and operate in compliance with nondiscrimination and equal opportunity requirements.

## **PART II: SCOPE OF THE FSS PROGRAM**

### **2-II.A. HOUSING-ASSISTED FAMILIES ELIGIBLE TO PARTICIPATE IN FSS**

The HCV and public housing programs through which families are eligible to participate in the FSS program was expanded by the 2018 Economic Growth Act to allow participants in HCV Homeownership, Moderate Rehabilitation, Moderate Rehabilitation Single Room Occupancy, and Family Unification Program (FUP), including the Foster Youth to Independence (FYI) Initiative.

### **2-II.B. PHAs REQUIRED TO OPERATE AN FSS PROGRAM**

Each PHA that received funding for public housing units under the FY 1991 and FY 1992 FSS incentive award competitions must operate a public housing FSS program. Each PHA that received funding for HCV rental certificates or vouchers under the combined FY 1991/1992 FSS incentive award competition also must operate a HCV FSS program.

In addition, unless the PHA receives an exemption under 24 CFR 984.105, each PHA for which HUD reserved funding (budget authority) for additional rental certificates or vouchers in FY 1993 through October 20, 1998, must operate a HCV FSS program. Each PHA for which HUD reserved funding (budget authority) to acquire or construct additional public housing units in FY 1993 through October 20, 1998, must operate a public housing FSS program as well.

Every PHA that was required to administer an FSS program on May 24, 2018 (the enactment date of the Economic Growth, Regulatory Relief, and Consumer Protection Act) must continue to operate that FSS program for the total number of families determined by HUD on that date unless the PHA receives an exception as described in 24 CFR 984.105(d).

### **Mandatory Minimum Program Size (MMPS) [24 CFR 984.105]**

PHAs that are required to operate an FSS program under 24 CFR 984.101 are subject to a minimum program size requirement.

#### PHA Minimum Program Size

As determined by HUD as of May 24, 2018, the PHA's FSS MMPS is **15**.

#### ***Maintaining Mandatory Minimum Program Size***

Although the discretion to do so ultimately rests with the PHA, mandatory minimum program size can decrease as FSS participants successfully complete the program. Per the regulation, for each family that completes the program by fulfilling its FSS contract of participation on or after May 24, 2018, the mandatory minimum program size for a PHA's FSS program is reduced by one slot. However, if an FSS slot is vacated by a family that has not completed its FSS contract of participation obligations, the slot must be filled by a replacement family which has been selected in accordance with the FSS family selection procedures [24 CFR 984.105(b)(2)].

#### PHA Policy

The PHA will reduce the FSS mandatory minimum program size by one for each family that completes the program by fulfilling its FSS contract of participation.

#### ***Option to Operate Larger FSS Program***

A PHA may choose to operate an FSS program of a larger size than the minimum required by HUD [24 CFR 984.105(a)(3)].

#### PHA Policy

The PHA will not operate an FSS program of a larger size than its mandatory minimum program size.

#### ***Exception to Program Operation [24 CFR 984.105(c)]***

The requirement to establish and carry out an FSS program may be waived with approval from HUD. In order to waive the requirement, the PHA must provide a certification to HUD that the establishment and operation of an FSS program is not feasible because of a lack of accessible supportive services funding, a lack of the availability of programs under the Workforce Innovation and Opportunity Act, a lack of funding for reasonable administrative costs, a lack of cooperation by other units of state or local government, or a lack of interest in participating in the FSS program on the part of eligible families.

An exception will not be granted if HUD determines that local circumstances do not preclude the PHA from effectively operating an FSS program that is smaller than the minimum program size.

#### ***Reduction in Program Size***

Rather than a full exception to program operation, a PHA may also be permitted to operate an FSS program that is smaller than the minimum program size. As with the full exception, HUD may grant the PHA such a partial exception if the PHA provides to HUD a certification that the operation of an FSS program of the minimum program size is not feasible because of a decrease in or lack of accessible supportive services [24 CFR 984.105(d)].

### ***Expiration of Exception***

The approval for a full or partial exception to the FSS minimum program size requirement expires five years from the date of HUD approval of the exception. If a PHA seeks to continue an exception after its expiration, the PHA must submit a new request and a new certification to HUD for consideration [24 CFR 984.105(e)].

### **2-II.C. COOPERATIVE AGREEMENTS [24 CFR 984.106]**

A PHA may enter into a Cooperative Agreement with one or more multifamily-assisted housing owners to voluntarily make the PHA's FSS program available to the owner's housing tenants. The Cooperative Agreement must include all the requirements for such agreements found in 24 CFR 984.106 and 24 CFR 887.107.

#### **PHA Policy**

The PHA will enter into a Cooperative Agreement with the following multifamily-assisted housing owner(s) to voluntarily make its FSS program available to those owner's housing residents:

*N/A*

The PHA will share an action plan with multifamily-assisted housing that is a separate action plan from the PHA's HCV or public housing FSS program's action plan.

Participants enrolled under these Cooperative Agreements will be counted toward the PHA's calculation of the award of FSS Coordinator grants and, upon completion, will reduce the PHAs mandatory minimum program size by one for each completion.

### **2-II.D. ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]**

The PHA must state the number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS program based on available and anticipated federal, tribal, state, local, and private resources.

#### **PHA Policy**

*15* eligible FSS families can reasonably be expected to receive supportive services under the FSS program, based on available and anticipated federal, tribal, state, local, and private resources.

### **2-II.E. ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201(d)(3)]**

If applicable, the PHA must enter the number of families, by program type, who are participating in any other local housing self-sufficiency program who are expected to agree to execute an FSS contract of participation.

#### **PHA Policy**

The PHA does not operate other self-sufficiency programs and therefore no additional families from other programs are expected to execute an FSS contract of participation.

## **2-II.F. ELIGIBILITY OF A COMBINED PROGRAM [24 CFR 984.201(e)]**

A PHA that wishes to operate a joint FSS program with other PHAs or owners of multifamily-assisted housing may combine its resources with one or more of these entities to deliver supportive services under a joint action plan that will provide for the establishment and operation of a combined FSS program that meets the requirements of this part.

### PHA Policy

The PHA will not combine its resources with any other PHA to deliver support services, have a joint action plan, or establish or operate a combined FSS Program.

## **PART III: PROGRAM OPERATION**

### **2-III.A. OVERVIEW**

Federal regulations specify requirements for FSS program operation regarding deadlines for program start-up and when the PHA is expected to have attained full enrollment. A timetable illustrating when the PHA intends to meet these deadlines is included as part of the required contents of the action plan.

### **2-III.B. PROGRAM IMPLEMENTATION DEADLINE**

The deadlines for program implementation differ depending on whether the FSS program is voluntary or mandatory.

#### **Voluntary Program [24 CFR 984.301(a)]**

There is no deadline for implementation of a voluntary program. However, a voluntary program may not be implemented before the requirements specified in 24 CFR 984.201 have been satisfied (see Sections 1-II.A.–1-II.D.).

### **2-III.C. TIMETABLE FOR PROGRAM IMPLEMENTATION [24 CFR 984.201(d)(13)]**

A timetable for implementation of the FSS program is part of the required contents of the FSS action plan.

### PHA Policy

For voluntary programs, the PHA will implement the FSS program within one year from the date of approval of either the FSS action plan by the HUD field office, or within the time identified in the applicable FSS funding contract with HUD.

For mandatory FSS programs, the PHA has the obligation to continue to fill their mandatory FSS slots effective May 24, 2018, as determined by the HUD field office.

The PHA will implement its FSS program according to the following timetable:

<b>Activity</b>	<b>Month and Date</b>
Establish PCC	January 2023
Conduct Program Needs Assessment	January 2023

Resource Identification	January 2023
Establish Policies	January 2023
Design Service Delivery	January 2023
Develop Administrative Procedures	January 2023
Begin Service Delivery	February 2023
Conduct Outreach	January 2023
Conduct Orientations	February 2023
Conduct Individual Needs Assessment	February 2023 Ongoing
Begin Contracting	February 2023 Ongoing
Complete Contracting	Ongoing

## PART IV: DEFINITIONS

### 2-IV.A. DEFINITIONS [24 CFR 984.103]

The terms *1937 Act*, *fair market rent*, *HUD*, *low-income family*, *public housing*, *public housing agency (PHA)*, *secretary*, and *HCV*, as used in this document are defined in the 24 CFR Part 5.

The term *very low-income family* is defined in 24 CFR 813.102 and 24 CFR 913.102.

The terms used in this document have the following definitions as defined by 24 CFR 984.103 and this family self-sufficiency action plan.

*Baseline annual earned income* means the FSS family's total annual earned income from wages and business income (if any) as of the effective date of the FSS contract. When calculating baseline annual earned income, all applicable exclusions of income must be applied, *except for* any disregarded earned income or other adjustments associated with self-sufficiency incentives that may apply to the determination of annual income.

*Baseline monthly rent* means 1) the FSS family's total tenant payment (TTP), as of the effective date of the FSS contract, for families paying an income-based rent as of the effective date of the FSS contract; or 2) the amount of the flat or ceiling rent (which includes the applicable utility allowance), and including any hardship discounts, as of the effective date of the FSS contract. For families paying a flat or ceiling rent this is as of the effective date of the FSS contract.

#### PHA Policy

*Benefits* means a government benefit of money or monetary value given to an individual by a federal, state, or local government agency for purposes of financial assistance, including but not limited to, Medicaid, supplemental nutritional assistance program benefits and Social Security, Temporary Assistance for Needy Families, and unemployment compensation benefits.

#### PHA Policy

*Benefits cliff* means the sudden and often unexpected decrease in public benefits that can occur with a small increase in earnings. When income increases, families sometimes lose some or all economic supports.

#### PHA Policy

*Certain interim goals* means the family has met all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date.

*Certification* means a written assertion based on supporting evidence, provided by the FSS family or the PHA or owner, which must be maintained by the PHA or owner in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification. These must be made available for inspection by HUD, the PHA or owner, and the public, when appropriate. In addition, these will be considered accurate unless the Secretary or the PHA or owner, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.

*Chief executive officer (CEO)* means the CEO of a unit of general local government who is the elected official or the legally designated official having primary responsibility for the conduct of that entity's governmental affairs.

*Contract of participation (CoP)* means a contract in a form approved by HUD, entered into between a participating FSS family and a PHA operating an FSS program that sets forth the terms and conditions governing participation in the FSS program. The contract of participation includes all individual training and services plans entered in between the PHA and all members of the family who will participate in the FSS program, and which plans are attached to the contract of participation as exhibits. For additional detail, see 24 CFR 984.303.

*Current annual earned income* means the FSS family's total annual earned income from wages and business income (if any) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract. When calculating current annual earned income, all applicable exclusions of income will apply, including any disregarded earned income and other adjustments associated with self-sufficiency incentives or other alternative rent structures that may be applicable to the determination of annual income.

*Current monthly rent* means either the FSS family's TTP as of the most recent reexamination of income, which occurs after the effective date of the FSS contract, for families paying an income-based rent as of the most recent reexamination of income; or the amount of the flat rent, including applicable utility allowance or ceiling rent. This amount must include any hardship discounts, as of the most recent reexamination of income, which occurs after the effective date of the FSS contract, for families paying a flat rent or ceiling rent as of the most recent reexamination of income.

*Earned income* means income or earnings included in annual income from wages, tips, salaries, other employee compensation, and self-employment. Earned income does not include any pension or annuity, transfer payments, any cash or in-kind benefits, or funds deposited in or accrued interest on the FSS escrow account established by a PHA on behalf of a participating family.

*Effective date of contract of participation* means the first day of the month following the month in which the FSS family and the PHA entered into the contract of participation.

*Eligible families* for the FSS program means current participants in HCV, residents of public housing, or residents in multifamily-assisted housing if a Cooperative Agreement exists.

#### PHA Policy

*Enhance the effectiveness of the FSS program* means a demonstrable improvement in the quality of an FSS program in which the enrollment ratio, escrow balance average, and graduation rate is at or above the national average as measured in HUD's Composite Scores in FR Notice 11/15/18.

*Enrollment* means the date that the FSS family entered the contract of participation with the PHA.

*Family self-sufficiency program* or *FSS program* means the program established by a PHA within its jurisdiction to promote self-sufficiency among participating families, including the provision of supportive services to these families, as authorized by section 23 of the 1937 Act.

*FSS escrow account* means the FSS escrow account authorized by section 23 of the 1937 Act.

*FSS escrow credit* means the amount credited by the PHA to the participating family's FSS account.

*FSS family* means a family that receives HCV assistance or resides in public housing (section 9), that elects to participate in the FSS program, and whose designated adult member (head of FSS family) has signed the CoP.

*FSS family in good standing* means an FSS family that is in compliance with their FSS CoP, has either satisfied or are current on any debts owed the PHA or owner, and is in compliance with the regulations in 24 CFR Part 5 regarding participation in the relevant rental assistance program.

*FSS-related service program* means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of *supportive services*.

*FSS slots* refer to the total number of public housing units or the total number of rental vouchers that comprise the minimum size of a PHA's respective HCV and public housing FSS program.

*FSS Program Coordinator* means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS participants; goal setting and case management/coaching of FSS participants; collaborating with the community and service partners; and tracking program performance.

*FY* means federal fiscal year (starting with October 1, and ending September 30, and designated by the calendar year in which it ends).

*Head of FSS family* means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent.

*Individual Training and Services Plan (ITSP)* means a written plan that is prepared by the PHA or owner in consultation with a participating FSS family member (the person with for and whom the ITSP is being developed), and which describes the final and interim goals for the participating FSS family member, the supportive services to be provided to the participating FSS family member, the activities to be completed by that family member, and the agreed upon completion dates for the goals, and activities. Each ITSP must be signed by the PHA or owner



and the participating FSS family member and is attached to and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS program, including the head of FSS family who has signed the CoP.

#### PHA Policy

*Knowledgeable professional* means a person who is knowledgeable about the situation, has training, education, certification, or licensure provided by recognized professional associations and institutions that legitimizes their professional opinion, is competent to render a professional opinion, and is not able to gain, monetarily or otherwise, from the PHA FSS program decision in the area to which they are certifying.

*Multifamily-assisted housing, also known as project-based rental assistance (PBRA)*, means rental housing assisted by a HCV Housing Payments Program, pursuant to 24 CFR Parts 880, 881, 883, 884, and 886.

#### PHA Policy

*Other costs related to achieving obligations in the contract of participation* means any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP.

*Owner* means the owner of multifamily-assisted housing.

*Participating family* is defined as *FSS family* in this section.

*Program coordinating committee (PCC)* means the committee described in 24 CFR 984.202.

*Public housing* means housing assisted under the 1937 Act, excluding housing assisted under HCV of the 1937 Act.

*HCV* means assistance provided under HCV of the 1937 Act (42 U.S.C. 1437f). Specifically, multifamily-assisted housing, as defined in this section; tenant-based and project-based rental assistance under HCV(o) of the 1937 Act; the HCV homeownership option under HCV(y) of the 1937 Act; Family Unification Program (FUP) assistance under HCV(x) of the 1937 Act; and the HCV Moderate Rehabilitation (Mod Rehab) for low-income families and Moderate Rehabilitation Single Room Occupancy (Mod Rehab SRO) for homeless individuals under 24 CFR part 882.

*Self-sufficiency* means that an FSS family is no longer receiving HCV, public housing assistance, or any federal, state, or local rent or homeownership subsidies or welfare assistance.

Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS account funds.

#### PHA Policy

*Supports* means, but is not limited to, transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator.

*Supportive services* mean those appropriate services that a PHA will coordinate on behalf of an FSS family under a CoP. These may include child care of a type that provides sufficient hours of operation and serves an appropriate range of ages; transportation necessary to enable a participating family to receive available services or to commute to their places of employment; remedial education; education for completion of secondary or post-secondary schooling; job training, preparation, and counseling; job development and placement; follow-up assistance after job placement and completion of the contract of participation; substance/alcohol abuse treatment and counseling; training in homemaking and parenting skills; and personal welfare services that include substance/alcohol abuse treatment and counseling, and health, dental, mental health and health insurance services; household management; money management; counseling regarding homeownership or opportunities available for affordable rental and homeownership in the private housing market (including information on an individual's rights under the Fair Housing Act) and financial empowerment that may include financial literacy, coaching, asset building, money management; and any other services and resources, including case management and reasonable accommodations for individuals with disabilities, that the PHA may determine to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency.

*Unit size or size of unit* refers to the number of bedrooms in a dwelling unit.

*Very low-income family* is defined as set out in 24 CFR 813.102

*Welfare assistance* means (for purposes of the FSS program only) income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs. Welfare assistance does not include nonrecurrent, short-term benefits that are designed to deal with a specific crisis situation or episode of need, or are not intended to meet recurrent or ongoing needs and will not extend beyond four months; work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training); supportive services such as child care and transportation provided to families who are employed; refundable earned income tax credits; contributions to, and distributions from, individual development accounts under TANF; services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment-related services that do not provide basic income support; transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Social Security Act, to an individual who is not otherwise receiving assistance; amounts solely directed to meeting housing expenses; amounts for health care; food stamps and emergency rental and utilities assistance; and SSI, SSDI, or social security.

## Chapter 3

### PROGRAM ADMINISTRATION

#### INTRODUCTION

This chapter discusses administrative policies and practices as they are relevant to the activities covered in this plan. The policies and practices are discussed in two parts:

Part I: Staffing, Fees and Costs, and On-Site Facilities: This part describes identifying appropriate staff and contractors to operate the FSS program and provide the necessary direct services to FSS families. In addition, it describes how administrative fees, costs, and supportive services will be funded, and defines the use of on-site facilities.

Part II: The Program Coordinating Committee: This part covers the establishment of a program coordinating committee (PCC), which is a regulatory requirement in all FSS programs other than multifamily housing assistance. It describes required and recommended PCC membership, in addition to the option for an alternative committee.

#### PART I: STAFFING, FEES AND COSTS, AND ON-SITE FACILITIES

##### 3-I.A. OVERVIEW

Several functions of program administration are crucial to running an FSS program. A PHA may need to employ a program coordinator or decide to contract with another organization to administer the program. In addition to staffing issues, PHAs should understand how program funding and expenses work to keep the program running smoothly. Finally, PHAs need to sort out whether and how to make common areas or unoccupied units available to provide supportive services.

##### 3-I.B. PROGRAM ADMINISTRATION STAFF AND CONTRACTORS

###### [24 CFR 984.301(b)]

PHAs have the choice between hiring their own staff and contracting with an outside organization to administer their FSS program. If the PHA should choose to employ its own staff, the staffing levels should be appropriate, and may include one or more FSS coordinators. If the PHA chooses to contract with an outside organization, the organization's staffing levels must likewise be appropriate to establish and administer the FSS program, and whether the organization's responsibilities would include managing the FSS account in accordance with federal regulations.

###### PHA Policy

The PHA will employ appropriate staff, including one or more FSS coordinators or program coordinators to administer its FSS program.

### **3-I.C. FSS PROGRAM COORDINATOR RESPONSIBILITIES**

#### **Primary Role of the FSS Program Coordinator**

The FSS Program Coordinator is responsible for building partnerships with service providers in the community, working with the Program Coordinating Committee (PCC) and local service providers to ensure that FSS program participants are linked to the supportive services they need to achieve self-sufficiency, preparing an Individual Training and Services Plan (ITSP) for the head of the FSS family and each adult member of the FSS family who elects to participate in the FSS program, making certain that the services included in the participants' CoP are provided on a regular, ongoing, and satisfactory basis, ensuring FSS participants are fulfilling their responsibilities under the CoPs, monitoring progress of participants, and establishing and properly maintaining FSS escrow accounts for eligible families. FSS coordinators may also provide outreach, recruitment, goal setting, case management and coaching for FSS participants, and tracking of FSS program performance.

FSS Program Coordinators funded under the FSS Coordinator Notice of Funding Opportunity (NOFO) may not perform the routine public housing or HCV program functions of housing eligibility, leasing, rent calculation, and portability that are funded through HCV administrative fees or public housing operating funds unless doing so would enhance the effectiveness of the program. If conducting these functions would enhance the effectiveness of the FSS program, the PHA must seek prior approval from HUD of those enhancements to the FSS program and certify that doing so will neither interfere with the FSS Coordinator's ability to fulfill their primary role nor be used to balance or fill in for gaps in traditional staffing.

Performance of routine HCV or public housing functions for non-FSS families does not enhance the effectiveness of the FSS program and is therefore an ineligible use of FSS funds [2021 FSS NOFO, p. 36].

#### **PHA Policy**

The PHA will not require the FSS Program Coordinator to perform the routine HCV or public housing program functions of housing eligibility, leasing, rent calculation, and portability that are funded through HCV administrative fees or public housing operating funds.

### **3-I.D. ADMINISTRATIVE FEES AND COSTS**

The Consolidated Appropriations Act of 2014 combined funding streams for the HCV and public housing FSS programs. FSS funding is now awarded through one NOFO. Use of this funding is no longer restricted to the applicable program and funding now may be used to serve both HCV and public housing FSS participants. Funding for FSS Coordinators salary, benefits, and training as well as limited administrative costs is awarded through a Grant Agreement and disbursed through HUD's Line of Credit Control System (LOCCS), rather than as an amendment to the PHA's Annual Contributions Contract (ACC). These funds are separate from other available funds that may be used.

#### **HCV FSS Program**

In the HCV programs, administrative fees are paid to PHAs for HUD-approved costs associated with the operation of an FSS program. These administrative fees are established by Congress and subject to appropriations [24 CFR 984.302(b)].

In addition, administrative fees for HUD-approved costs not specifically related to the operation of the FSS program may be used to cover these costs associated with the administration of FSS [see Notice PIH 93-24 E-7 and E-8].

See 24 CFR 982.152 and PIH 2022-18 for details on the eligible use of administrative fees.

### **Public Housing FSS Program**

For public housing FSS programs, the performance funding system (PFS), provided under section 9(a) of the 1937 Act, provides for the reasonable and eligible administrative costs that the PHA incurs in carrying out the program only when funds have been appropriated. However, a PHA may use other resources for this purpose [24 CFR 984.302(a)].

In other words, the PHA may fund reasonable and eligible administrative costs in the FSS program from the Operating Fund. However, these expenses will only be reimbursed in the operating subsidy when a current appropriations act allows it. In addition, the PHA may fund reasonable and eligible administrative costs from the Capital Fund. Administrative staffing costs may also be funded through HUD or other grant or foundation sources. This includes FSS Coordinator grants when available.

#### PHA Policy

The PHA will make 10% of grant fringe available for this from the HUD grant. A portion will be covered by the PHA Operating fund and ongoing efforts will be made to secure other funding sources available to provide administrative costs under the HCV and public housing FSS programs.

### **3-I.E. SUPPORTIVE SERVICES FEES AND COSTS**

#### **HCV FSS Supportive Services**

In the HCV program, the PHA may fund reasonable and eligible FSS supportive service costs in the FSS program from unrestricted net position [see Notice PIH 93-24, E-3].

The PHA may seek additional funds from HUD through submitting grant applications or seek grants from other sources when available.

In addition to unrestricted net position and other grant sources, the FSS forfeited escrow account can fund FSS supportive services. See Section 6-I.E. for eligible supportive services costs.

#### **Public Housing FSS Supportive Services**

In public housing, the PHA may fund reasonable and eligible FSS supportive service costs in the FSS program from the Operating Fund. However, the costs of FSS supportive services are only reimbursed through the operating subsidy when appropriations allow it.

FSS public housing supportive services can also be funded through other HUD grants or related government and foundation grants, when available.

#### PHA Policy

The PHA will make the PHA is pursuing HUD grant funds as well as other funding sources available to provide supportive service costs under the HCV and public housing FSS programs.

### 3-I.F. USE OF FORFEITED ESCROW ACCOUNTS FUNDS

In addition to HCV unrestricted net assets, public housing operating funds, and other grant sources, the FSS forfeited escrow account funds must be used for the benefit of FSS participants, which includes supports and other costs for FSS participants in good standing. HUD does not provide an exhaustive list of these supports. However, the supports include, but are not limited to, transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the contract of participation as well as training for FSS Program Coordinators.

#### PHA Policy

The PHA will use forfeited escrow accounts for support and other costs for FSS participants in good standing when funds requested are needed to complete an interim goal or task in the ITSP and are not ongoing expenses or if the family can demonstrate that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals in the ITSP.

The PHA will use forfeited escrow accounts for training provided to FSS Coordinators.

The PHA will define *supports* as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s)

The PHA will define *other costs related to achieving obligations in the CoP* as any costs necessary to complete an interim goal, a final goal, or tasks related to such in the ITSP as defined in 24 CFR 984.305(f)(2)(i)(A) as transportation, childcare, training, testing fees, employment preparation costs, other costs related to achieving obligations outlined in the CoP, and training for FSS Program Coordinator(s).

The PHA will define *necessary to complete* as meaning that no other resources are available in the community either because such a resource is non-existent or that resources are utilized above capacity and agencies cannot, for an indetermined period, provide such a resource.

The PHA will provide funds from the forfeited escrow account to FSS participants in good standing before requiring the participant to use an “interim” disbursement from their current escrow account so long as:

The funds requested are needed to complete an interim goal or task within the CoP and are not ongoing expenses; or

If the family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

The PHA will prioritize requests for funds from forfeited escrow accounts initially on a first come first served basis based on the date and time of the request. After that order is established, while still preserving the first come first served basis, the PHA will apply the following priorities:

Priority 1: Funds to meet a goal in the ITSP that is necessary to ensure the safety and wellbeing of victims of domestic violence, dating violence, sexual assault, and stalking as defined in the PHA's HCV Administrative Plan and public housing Admissions and Continued Occupancy Policy regarding VAWA.

Priority 2: Funds to meet a goal in the ITSP that is necessary to stabilize health, safety, and welfare of the FSS participant or family that if left unattended would jeopardize education, training, or employment.

Priority 3: Funds to meet a goal in the ITSP that is necessary to further education, training, and employment goals in the ITSP including childcare, transportation, and medical costs if the lack of any of these prevents completion of the education, training, and employment.

Priority 4: Funds to meet a goal in the ITSP that is necessary to further any other goal or tasks.

### **3-I.G. ON-SITE FACILITIES**

Each PHA may, subject to the approval of HUD, make available and utilize common areas or unoccupied dwelling units in public housing projects to provide supportive services under an FSS program. This includes using such areas for participants in a HCV FSS program.

#### PHA Policy

The PHA will make space available at Westhaven and or Crescent Halls while pursuing other locations as they become available such as the PHA's Sixth Street location to provide supportive services under the HCV and public housing FSS programs.

## **PART II: PROGRAM COORDINATING COMMITTEE**

### **3-II.A. OVERVIEW**

As another integral part of FSS program administration, each participating PHA must establish a program coordinating committee (PCC) whose functions will be to assist the PHA in securing commitments of public and private resources for the operation of the FSS program within the PHA's jurisdiction, including assistance in developing the action plan and in implementing the program [24 CFR 984.202(a)].

The PCC must consist of specific members, which are dependent upon whether the PHA is operating HCV, public housing, or multifamily assisted housing FSS programs. In addition to these required members, the PCC may also include additional members recommended by regulation.

### **3-II.B. PROGRAM COORDINATING COMMITTEE MEMBERSHIP**

#### **Required PCC Membership [24 CFR 984.202(b)(1)]**

The PCC required members consist of representatives of the PHA, including at least one FSS Program Coordinator, and one or more participants from each HUD rental assistance program (HCV, public housing, or multifamily assisted housing) served by the PHA's FSS program.

##### PHA Policy

The PHA's representatives to the program coordinating committee will be the Deputy Executive Director, Director of Housing, and Manager of the HCV and at least one FSS Program Coordinator and one or more participants from each of the housing programs in which there is an FSS program: HCV, public housing, and multifamily assisted housing, as applicable.

#### **Assistance in Identifying Potential PCC Members [24 CFR 984.202(b)(1)]**

The PHA may seek assistance from area-wide, city-wide, or development-based resident councils, the resident management corporation, or the Resident Advisory Board, in identifying potential PCC members.

##### PHA Policy

The PHA will seek assistance in identifying potential members of the PCC from area-wide, city-wide, and development-based resident councils, the resident management corporation, or the Resident Advisory Board.

#### **Recommended PCC Membership [24 CFR 984.202(b)(2)]**

Membership on the PCC also may include representatives of the unit of general local government served by the PHA, local agencies (if any) responsible for carrying out employment training programs or programs funded under the Workforce Innovation and Investment Act, and other organizations, such as other state, local, or tribal welfare and employment agencies, public and private education or training institutions, child care providers, nonprofit service providers, private business, and any other public and private service providers with resources to assist the FSS program.

##### PHA Policy

The PHA's FSS program coordinating committee membership will include leadership from the following organizations:

***PLEASE SEE EXHIBIT 3-1: CHART FOR DETERMINING PCC MEMBERSHIP***

### **3-II.C. ALTERNATIVE PCC COMMITTEE [24 CFR 984.202(c)]**

It is also possible for the PHA, in consultation with the chief executive officer of the unit of general local government served by the PHA, to use an existing entity as the PCC, if the membership of the existing entity consists or will consist of the individuals required by regulation (See section 3-II.B. above).

##### PHA Policy

The PHA will not utilize an existing entity as its program coordinating committee.



### EXHIBIT 3-1: CHART FOR DETERMINING PCC MEMBERSHIP

Organization or Service Type	Organization Name	PCC Member Title	PCC Member Name
Housing	Charlottesville Redevelopment and Housing Authority	PHA Deputy Executive Director Director of Housing Services Housing Choice Voucher Program Manager	Kathleen Glenn-Matthews TerAna Banks Consuela Knight
GED and Educational Training	Piedmont Virginia Community College-Thomas Jefferson Adult Career Education (TJACE)	Director of TJACE	Carol Coffey
High School	Charlottesville City Public High School	Principal or Designee	Rashad Pitt or Designee
Post-Secondary Schools	University of Virginia-The Equity Center	Executive Director	Ben Allen or Designee
Job Training	Virginia Career Works-Piedmont Region	Workforce Director or Designee	Sarah Morton or Designee
Job Search, Placement, Retention	Charlottesville Department of Social Services	Director or Designee	Sue Moffet or Designee
Transportation	City of Charlottesville	Director of Transportation or Designee	Garland Williams or Designee
Health Care	University of Virginia School of Nursing	Westhaven Community Nurse	Sharon Veith or Designee
Alcohol and Drug Prevention	Region Ten Community Service Board	Director of Substance Abuse Services	Deidre Creasy-Quiringo
Mentoring	University of Virginia-The Equity Center- Star Hill Program	Associate Director or designee	Lucy Montalvo or Designee

<b>Organization or Service Type</b>	<b>Organization Name</b>	<b>PCC Member Title</b>	<b>PCC Member Name</b>
Homeownership	Piedmont Housing Alliance	Director of Housing Counseling and Economic Opportunity or designee	Kristen Lucas or Designee
Individual Development Accounts	Atlantic Union Bank	Vice President/ Solutions Banking Relationship Manager or designee	Cheryl Kirby or Designee
Child Care	Ready Kids	Executive Director or Designee	Jacki Bryant or Designee
City, State, or County Government	Virginia General Assembly	Delegate or Designee	Sally Hudson or Designee
Community-Based Organizations	Public Housing Association of Residents	Executive Director or Designee	Shelby Edwards or Designee
Social Service Funding and Coordination Organizations	Charlottesville Department of Social Services	Director or designee	Sue Moffett
Information and Referral Services	International Neighbors	Chief Executive Officer	Kerri Miller or Designee
Crisis Services	Shelter for Help and Emergency	Executive Director	Mary Carter Lominack or Designee
	Charlottesville Department of Human Rights	Director or Designee	Todd Niemeier or Designee
Child/Adult Protective Services	Jefferson Area Board of Aging (JABA)	Aging Services Coordinator	Annie Lorenzoni
Vocational Rehabilitation	State Department of Rehabilitation Regional Centers	Human Serves and or OAR	Misty Graves Roy Home to Hope Gary Spry
Employment Development	Network2Work	Life and Career Coach or Designee	Victoria Maxey or Designee
Parks and Recreation	Charlottesville Parks and Rec	Director or Designee	Dana Kasler or Designee

<b>Organization or Service Type</b>	<b>Organization Name</b>	<b>PCC Member Title</b>	<b>PCC Member Name</b>
Religious Organizations	City Church	Life Groups, Prayer and Growth Pastor or designee	Keith Rogers or Designee
Financial Institutions	Atlantic Union Bank	Vice President/ Solutions Banking Relationship Manager or designee	Cheryl Kirby or Designee
Legal Services	Legal Aid Justice Center (LAJC)	Executive Director or Designee	Angela Coffey or Designee
Debt Resolution Services	Piedmont Housing Alliance- Financial Opportunity Center	FOC Manager or Designee	Dave Norris or Designee

## Chapter 4

### SELECTING AND SERVING FSS FAMILIES

#### INTRODUCTION

FSS regulations require that the PHA include in its action plan a statement indicating how it will select families for participation in the FSS program. This includes outreach, waiting list management, and other selection procedures. When followed, the PHA's selection procedures ensure that families will be selected without regard to race, color, religion, sex, handicap, familial status, or national origin.

Once selected for participation in the FSS program, families are to be provided various activities and supportive services so that they may obtain the education, employment, business, and social skills necessary to achieve self-sufficiency. A description of such activities and supportive services is also a requirement of the FSS action plan.

This chapter contains three parts:

Part I: Incentives, Outreach, and Assurance of Noninterference: This part describes the incentives the PHA will offer and the outreach efforts the PHA will use to encourage participation and recruit eligible families for the FSS program and contains the required assurance of noninterference with the rights of nonparticipating families.

Part II: Family Selection: This part covers whether the PHA will use preferences for family selection and which preferences the PHA will employ if they choose to do so. In addition, this part describes the selection factors the PHA will use in screening families for participation in the FSS program.

Part III: Activities and Support Services: This part lists the activities and supportive services to be provided to families through both public and private resources, describes the method the PHA will use to identify family support needs, and covers the required certification of coordination.

## **PART I: INCENTIVES, OUTREACH, AND ASSURANCE OF NONINTERFERENCE**

### **4-I.A. OVERVIEW**

The FSS program offers incentives such as the FSS escrow account, case management, coaching, and other supportive services that not only encourage participation, but also help families achieve self-sufficiency. In addition to encouraging program participation through such incentives, PHAs also conduct outreach to recruit FSS participants from among eligible families. As part of this process, families need to know that their choice as to whether to participate in the FSS program will not affect their admission to the Section 8 or public housing programs, nor will it affect their right to occupancy. This part describes the PHA's policies regarding these issues, all of which are required aspects of the FSS action plan.

### **4-I.B. INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]**

By regulation, the FSS action plan must include a PHA's incentives plan—a description of the incentives that the PHA intends to offer eligible families to encourage their participation in the FSS program. The incentives plan provides for the establishment of the FSS escrow account and any other incentives designed by the PHA.

#### PHA Policy

The PHA will offer the following services, as needed to complete obligations in the contract, to its FSS participants as incentives to participate in FSS.

<b>Incentive</b>	<b>Provided By</b>	<b>Description</b>
FSS escrow account	CRHA staff in the following departments- public housing (PH), Housing Choice Voucher (HCV) and Finance	FSS participants will be eligible to build savings from the FSS escrow account. Key policies and procedures applicable to the FSS escrow account
Case management/Coaching	Resident Services	All families who participate in the FSS program will be assigned an FSS coordinator who will provide coaching services to help each participating family to: <ul style="list-style-type: none"><li>• Understand the benefits of participating in the FSS program and how the program can help the family achieve its goals.</li><li>• Identify achievable, but challenging interim and final goals for participation in the FSS program, break down the</li></ul>

		<p>goals into achievable steps and accompany the family through the process.</p> <ul style="list-style-type: none"> <li>• Identify existing family strengths and skills.</li> <li>• Understand the needs that the family has for services and supports that may help the family</li> <li>• make progress toward their goals.</li> <li>• Access services available in the community through referral to appropriate service providers.</li> <li>• Overcome obstacles in the way of achieving a family's goals.</li> </ul>
Information and referrals to services	Resident Services	After enrollment in the FSS program, the FSS coordinator may make referrals to partner agencies for completion of one or more formal needs assessments. These assessments may focus on such issues as: employment readiness and employment training needs, educational needs related to secondary and post-secondary education, financial health, and other topics, depending on the needs and interests of the family.
Educational workshops	Resident Services	This includes partnering with organizations that conduct financial education workshops that cover topics such as credit, debt, savings, budgeting, asset building and banking services; and/or organizations that can provide financial coaching.
Funds for emergency transportation services	Resident Services	Provided from small grants and community partner referrals.
Funds for emergency child care service	Resident Services	Provided from small grants and community partner referrals.

Funds for emergency medical services	Resident Services	Provided from small grants and community partner referrals.
Funds for education and training	Resident Services	Provided from small grants and community partner referrals.
Funds for employment preparation	Resident Services	Provided from small grants and community partner referrals.
Priority in individual development accounts programs	Resident Services	Provided through community partnerships and POC participation.
Priority in homeownership programs	HCV	Provided through community partnerships and POC participation.
Priority in specific training programs	Resident Services	Provided through community partnerships and POC participation.
Priority in educational programs	Resident Services	Provided through community partnerships and POC participation.
Priority in specific support services	Resident Services	Provided through community partnerships and POC participation.

#### **4-I.C. OUTREACH EFFORTS [24 CFR 984.201(d)(6)(i)(ii)]**

In addition to offering incentives for FSS participation, PHAs also conduct outreach to recruit more FSS participants from eligible families. The FSS action plan must include a description of these efforts to recruit FSS participants, including notification and outreach, the actions the PHA will take to assure that both minority and nonminority groups are informed about the FSS program, and how the PHA will make this information known.

##### PHA Policy

The PHA will notify eligible families about the FSS program using the following outreach locations, activities, methods, and languages, where appropriate. These points of contact and methods have been selected to ensure that both minority and nonminority groups are informed about the FSS program.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Briefings/Orientations	PHA Staff Specialist	Flyer Presentation	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD (Housing and Urban Development) resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.
Interims/Recertifications	PHA Staff Specialist	Flyer Posters Presentation Referral Form	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.



<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Transfers/Portability	PHA Staff Specialist	Flyer Posters Presentation Referral Form	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.
Lobby	PHA Staff Receptionist	Flyer Posters Referral Form Video	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Waiting Room	PHA Staff	Flyer Posters Video	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.
Inspections	PHA Staff Inspector	Flyer Presentation	CRHA has staff at two sites who speak Spanish, another who speaks French and some African dialects. CRHA has a dial up language line for English and reading learners. We also have several Section 3 contractors who can provide interpretation and will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
PHA Website Social Media	PHA Staff	Video Presentation	CRHA will access any HUD resources as well as put in jobs for brochure interpretation through CatchAFire as interpretation needs arise.
TANF Office	Case Worker	TBD	The city of Charlottesville uses a language line and has some materials in different languages. When CRHA staff are involved, they will provide advocacy with a warm hand-off to ensure needed assistance is provided.
American Job Centers (Workforce/Career Center	Counselor	TBD	The Charlottesville Job Center uses a language line and has some materials in different languages. When CRHA staff are involved, they will provide advocacy with a warm hand-off to ensure needed assistance is provided.
Adult Education	Counselor Instructor	TBD	The adult education centers use a language line. When CRHA staff are involved, they will provide advocacy with a warm hand-off to ensure needed assistance is provided.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Community College	Counselor Instructor	TBD	PVCC uses a language line. When CRHA staff are involved, they will provide advocacy with a warm hand-off to ensure needed assistance is provided.
Employment Training Site	Instructor	TBD	This may vary with different contractors. CRHA will strive to provide advocacy with a warm hand-off to ensure assistance with interpretation and document translation to any English and reading learners we place. Our Section 3 department has a Spanish speaker, access to a language line and the ability to work with CatchAFire for document translation.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
English as a Second GED Classes Language Classes	Instructor	TBD	This may vary with different learning centers throughout the city. CRHA will strive to provide advocacy with a warm hand-off to ensure assistance with interpretation and document translation to any English and reading learners we place. Our Section 3 department has a Spanish speaker, access to a language line and the ability to work with CatchAFire for document translation.
Community-based Organizations	Case Worker	TBD	This may vary with different local organizations. CRHA will strive to provide advocacy with a warm hand-off to ensure assistance with interpretation and document translation to any English and reading learners we place. Our Section 3 department has a Spanish speaker, access to a language line and the ability to work with CatchAFire for document translation.

<b>Location/Activity</b>	<b>Staff/Partner</b>	<b>Method</b>	<b>Language</b>
Child Care Centers	Teachers	TBD	This may vary with different childcare centers throughout the city. CRHA will strive to provide advocacy with a warm hand-off to ensure assistance with interpretation and document translation to any English and reading learners we place. Our Section 3 department has a Spanish speaker, access to a language line and the ability to work with CatchAFire for document translation.

#### **4-1.D. ASSURANCE OF NONINTERFERENCE WITH THE RIGHTS OF NONPARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]**

A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS program, and PHAs need to make this known as part of the recruitment process. For this reason, the PHA's action plan must include an assurance that a family's decision to not participate in the FSS program will not affect the family's admission to the HCV or public housing programs, nor will it affect the family's right to occupancy in accordance with the lease.

##### PHA Policy

Participation in the FSS program is strictly voluntary. HCV participants and public housing residents will be notified in all literature and media presentations related to the FSS program that should they decide not to participate in the FSS program, it will not affect their HCV or public housing. This material will also specify that the family will retain the right to occupancy according to their lease and family obligations contract.

## **PART II: FAMILY SELECTION**

### **4-II.A. OVERVIEW**

The FSS action plan is required to contain a statement indicating the procedures for selecting families for FSS program participation, including a description of how the PHA will do so without regard to race, color, religion, sex (including actual or perceived gender identity), familial status, or national origin. This part describes these procedures, considering whether the PHA will use preferences for family selection and which preferences the PHA will employ if

they choose to do so, in addition to defining the factors the PHA will use in screening families for program participation.

#### **4-II.B. COMPLIANCE WITH NONDISCRIMINATION PROVISIONS**

In accordance with 24 CFR 5.105, all PHAs must comply with all federal, state, and local nondiscrimination laws and regulations, including but not limited to the Fair Housing Act, the Americans with Disabilities Act, and Section 504 of the Rehabilitation Act of 1973. In addition, PHAs need policies which both state that their actions will not discriminate and describe the steps taken to ensure nondiscrimination.

##### **PHA Policy**

No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the grounds of race, color, sex, religion, national or ethnic origin, family status, source of income, disability or perceived gender identity and sexual orientation.

In addition, the PHA's FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program (see Requests for Reasonable Accommodations).

The FSS program staff has the primary responsibility to make sure that participants are not discriminated against in the selection process. For families or individuals whose potential enrollment is in question, the FSS coordinators will review the file in a staff review meeting to ensure that non-selection is not based on discriminatory factors before the final decision is made. Any concerns regarding family's potential enrollment will be reviewed with the PHA's Fair Housing representative. Applicants will be notified in writing of the reasons they were not selected for participation and will have the opportunity to appeal the decision (see Section 5-II.I.). At all times, the PHA will select families for participation in the FSS program in accordance with FSS regulations and HUD guidelines.

#### **4-II.C. FSS SELECTION PREFERENCES**

As part of the process for selecting families for participation in the FSS program, the PHA may choose whether to employ the use of preferences. If the PHA so chooses, it has the option of giving a selection preference for up to 50 percent of its FSS program slots to eligible families who have one or more family members currently enrolled in an FSS-related service program or who are on the waiting list for such a program. Such a preference may be further limited to participants in and applicants for one or more specific eligible FSS-related service programs.

Should the PHA choose to adopt such a preference, it would need to include the following information in its action plan:

- The percentage of FSS slots, not to exceed 50 percent of the total number of FSS slots for each of its FSS programs, for which it will give a selection preference
- The FSS related service programs to which it will give a selection preference to the programs' participants and applicants

- The method of outreach to and selection of families with one or more members participating in the identified programs [24 CFR 984.203(a)]

A PHA may wish to adopt additional selection preferences as well [Notice PIH 93-24].

#### PHA Policy

The PHA will provide a selection preference for 25% of its FSS program slots to eligible families who have one or more family members currently enrolled in or on the waiting list for the FSS-related service programs of the PHA's partners on the FSS Program Coordinating Committee.

The PHA will give a selection preference on its FSS waiting list for HCV families porting in with an FSS contract of participation.

When services become available, the PHA will provide a non-targeted FSS selection preference to a family that wants to participate in the FSS program but was skipped or withdrew because supportive services were unavailable at the time.

The PHA may use either of the following to select among applicants on the FSS waiting list with the same preference status [24 CFR 984.203(b)]:

- Date and time of application to the FSS program; or
- A drawing or other random choice technique.

#### PHA Policy

The PHA will use the date the family expressed an interest in participating in the FSS program to fill the FSS slots.

### **4-II.D. SELECTION FACTORS**

Many factors contribute to whether a PHA may choose to select a family for participation in the FSS program. These selection factors can help the PHA screen families for admission, and ultimately contribute to the PHA's decision to either allow or deny a family's admission into the FSS program.

#### **Motivation Selection Factors [24 CFR 984.203(d)(1)]**

A PHA may screen families for interest and motivation to participate in the FSS program provided that the factors utilized by the PHA are those which solely measure the family's interest and motivation to participate in the FSS program. For this reason, PHAs must only apply motivational screening factors that are permissible under the regulations.

#### ***Permissible Motivation Selection Factors***

Permitted motivational factors include requiring attendance at FSS orientation sessions or pre-selection interviews or assigning certain tasks indicating the family's willingness to undertake the obligations that may be imposed by the FSS contract of participation. However, any tasks assigned should be readily accomplishable by the family based on the family members' educational level, abilities, or disabilities, if any. Reasonable accommodations must be made for individuals whose disability (mobility, manual, sensory, speech impairments, mental, or developmental disabilities) creates a barrier to accomplishing the tasks [24 CFR 984.203(d)(2)].



### PHA Policy

The PHA will screen families for interest and motivation to participate in the FSS program by assigning a meeting or workshop which is the same type of meeting or workshop for each family. The PHA will only use the fact that the family attended as a screening factor, even if tasks or exercises are not completed in the meeting. In addition, if the family needs either childcare or transportation to be able to attend, or requests accommodation for a disability, the PHA will either refer the family to available services or exempt the family from this screening factor.

### ***Prohibited Motivation Selection Factors***

Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or nonminority groups [24 CFR 984.203(d)(3)].

### **Other Selection Factors**

In addition to motivational screening, the PHA may also wish to screen families for the following additional factors.

### ***PHA Debt Selection Factor***

The PHA may deny FSS participation to a family if the family owes the PHA, or another PHA, money in connection with HCV or public housing assistance [Notice PIH 93-24, B-18].

### PHA Policy

The PHA will deny FSS participation to a family if the family owes the PHA, or another PHA, money in connection with HCV or public housing assistance. Families that owe money to a PHA who have entered into a repayment agreement and are current on that repayment agreement will not be denied FSS participation.

### ***Unavailable Support Services Selection Factor***

If the PHA determines, after consulting with the family, that a missing service is essential to the family's needs, the PHA may skip that family (and other similar families) and offer the FSS slot to the next family for which there are available services [Notice PIH 93-24, B-8].

### PHA Policy

In an effort to assure that no person or family on the FSS waiting list is denied for any reason the PHA commits to the following. The FSS Coordinator will bring the files to review with a representative of each department to discuss the reasons for "skipping or denying families. Applicant will be notified in writing, once documented and committee is in agreeance that all prerequisites haven't been met, solely on program criteria. Additionally, the family will be given an additional reasonable period of time (30 days) to meet the requirements before being removed from FSS waiting list. If removed the family is eligible to reapply for the FSS program in the future.

### ***Previous Participation Selection Factor***

A PHA may refuse to select a family for participation in the FSS program a second time if that family previously participated unsuccessfully (i.e., the family participated, did not meet its FSS obligations, and was terminated from the FSS program) [Notice PIH 93-24, B-14].

#### PHA Policy

The PHA will not refuse to select a family for participation in the FSS program a second time if that family previously participated and did not complete.

The PHA will enroll a family for participation in the FSS program a second time if that family previously participated, completed the COP (Contract of Participation), and received a final distribution of their escrow account if their employment skills or wages are below the level needed to achieve economic self-sufficiency (a wage that pays for basic needs without the use of subsidies).

### **4-II.D. SELECTION OF HEAD OF HOUSEHOLD**

Each eligible family that is selected to participate in an FSS program must enter a contract of participation with the PHA. There will be no more than one contract at any time for each family. There may be an ITSP for as many members of the family who wish to participate. The contract shall be signed by a representative of the PHA and the head of FSS family, as designated by the family. This head of FSS family does not have to be the same as the official head of household for rental assistance purposes [24 CFR 984.303(a)].

#### PHA Policy

The PHA will meet with the family and detail the obligations, rights, and privileges that pertain to the FSS head of household and require each adult family member to certify their agreement as to their designated head of the FSS family. These certifications will be a permanent part of the FSS family's record and will be updated with each change of head of household.

## **PART III: ACTIVITIES AND SUPPORT SERVICES**

### **4-III.A. OVERVIEW**

Once families are admitted to the FSS program, the PHA becomes responsible for making sure these families are adequately served. The purpose of the family self-sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of HCV and public housing assistance programs with public and private resources, to enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency. As such, upon selection, families are matched with the appropriate activities and supportive services so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency. This is a vital element of the FSS program. The PHA must make a good faith effort to replace the obtained services from another agency.

### **4-III.B. METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS [24 CFR 984.201(d)(8)]**

Before a PHA can determine the services and activities it will provide to FSS families, it must identify the services and activities appropriate to each family. The action plan must contain a

description of how the program will identify the needs of FSS families and deliver the services and activities according to these needs.

PHA Policy

Supportive services needs will be identified by completion of an informal needs assessment with the FSS coordinator or case manager or coach before completion of the initial individual training and services plan and signing of the contract of participation. After enrollment in the PHA's FSS program, a formal needs assessment, including vocational assessment and counseling, educational assessment and counseling, and employment planning, is conducted by the following partners on the PCC:

- Adult basic education
- Community college
- WTW agencies
- WIA One Stop Center
- TANF

These results are used to modify the ITSP, in mutual agreement with the family.

**4-III.C. FSS ACTIVITIES AND SUPPORT SERVICES DESCRIPTION**  
**[24 CFR 984.201(d)(7)]**

As part of the required contents of the action plan, PHAs must both describe the activities and supportive services to be provided by public and private resources to FSS families and identify the public and private resources that are expected to provide the supportive services.

Of course, this task assumes that the PHA has first identified the needed activities and supportive services.

PHA Policy

The PHA's FSS program, through its partners on the program coordinating committee, will provide the following activities and support services to FSS families:

Support Service General	Support Service Specific	Source/Partner
<b>Assessment</b>	Vocational Assessment	Adult Basic Education
	Educational Assessment	Career Center
	Vocational Planning	Community College
	Educational Planning	Community Based Organizations
	Disability Assessment	Career Center
	Disability Vocational Assessment/Planning	Community College
	Disability Educational Assessment/Planning	Vocational Rehabilitation
	Drug/Alcohol Assessment	Health Department
	Drug/Alcohol Planning	Career Center
		Community-based Organizations

<b>Support Service General</b>	<b>Support Service Specific</b>	<b>Source/Partner</b>
<b>Education</b>	High School English as a Second Language GED Post-secondary College	High School Adult Basic Education Community College University
<b>Training</b>	Skills Training Emerging Technologies Training Biomedical Training On-the-Job Training Functional Context Training	Adult Basic Education Community College University Community-based Organizations Workforce Innovation/American Job Centers
<b>Job Search Assistance</b>	Resume Preparation Interviewing Skills Dress for Success Workplace Skills Job Development Job Placement	Adult Basic Education Community College University Community-based Organizations Workforce Innovation/American Job Centers
<b>Transportation</b>	Bus Train/Trolley	Metropolitan Transit
<b>Health Care</b>	Alcohol and Drug Prevention Alcohol and Drug Treatment	HMO Health Department Community Clinic General Hospital
<b>Child Care</b>	Infant Care Toddler Care Preschool Care Afterschool Care Homework Assistance	Child Care Resource Parks and Recreation
<b>Financial Literacy</b>	Financial Education Financial Coaching Debt Resolution Credit Repair	Adult Basic Education Community College University Community-based Organizations
<b>Legal Services</b>	Representation Document Review Counsel or Advice	ACLU Legal Aid

<b>Support Service General</b>	<b>Support Service Specific</b>	<b>Source/Partner</b>
<b>Child/Adult Protective Services</b>	Needs Assessment Case Planning Information Referral Crisis Management	Senior Services Adult Services In-home Support Services Adult Abuse Hotline Child Abuse Hotline Foster Care Adoption Services
<b>Crisis Services</b>	Crisis Assessment Crisis Intervention Crisis Management Crisis Resolution	Crisis Team Senior Crisis Team Poison Center Domestic Violence Shelter
<b>Mentoring</b>	Mentoring Match	Adult Basic Education Community College Workforce Investment Act Youth Programs Community-based Organizations
<b>Micro and Small Business Development</b>	Training Planning Technical Assistance Mentoring	Microbusiness Assistance Program Small Business Administration Business Incubator
<b>Homeownership</b>	Training Planning Debt Resolution	Public Housing Authority Housing Counseling Organization Community-based Organizations
<b>Individual Development Accounts</b>	Match Savings Accounts Distribution of IDA Funds	Public Housing Authority TANF Office of Community Services in DHHS Office of Refugee Resettlement Beginner Farmers and Ranchers Community-based Organizations

#### **4-III.D. CERTIFICATION OF COORDINATION [24 CFR 984.201(D)(12)]**

The FSS action plan is required to contain a certification that the development of the activities and services under the FSS program has been coordinated with the JOBS program (now Welfare to Work under TANF), the programs under title I of the Workforce Innovation and Opportunity Act, and any other relevant employment, childcare, transportation, training, and education programs in the applicable area. The implementation of the FSS program's activities and services must continue to be coordinated as such to avoid duplication of activities and services.

### PHA Policy

The PHA certifies that its FSS program has developed its services and activities in coordination with programs under Title I of the Workforce Innovation and Opportunity Act, Workforce Investment Board and American Job Centers (also known as Workforce Centers or One Stop Career Centers), and any other relevant employment, childcare, transportation, training, and education programs in the applicable area. The implementation of these activities and services will continue to be coordinated in this manner to avoid duplication of activities and services.

## Chapter 5

### CONTRACT OF PARTICIPATION

#### INTRODUCTION

Each family that is selected to participate in an FSS program must enter into a contract of participation with the PHA. This contract, which is signed by the head of the FSS family, sets forth the principal terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of the PHA, the services to be provided to the head of the FSS family and each adult member of the family who elects to participate in the program, and the activities to be completed by them. The contract also incorporates the individual training and services plan [24 CFR 984.303].

This chapter contains two parts:

Part I: Overview and Family Obligations: This part provides an overview of the form and content of the contract of participation and describes what the contract requires of FSS families.

Part II: Contract Specifications: This part explains the specifications of the contract, including terms and conditions, contract modification, contract terminations, and grievance procedures.

#### PART I: OVERVIEW AND FAMILY OBLIGATIONS

##### 5-I.A. OVERVIEW

The purpose of the FSS contract of participation is to set forth the principal terms and conditions governing participation in the FSS program, including the incorporation of the individual training and services plan (ITSP) as part of the contract's required contents. The ITSP is meant to establish goals the FSS family will meet along the family's way to completing the contract and becoming self-sufficient. In addition to the goals specified in the ITSP, the contract also lists the responsibilities of the family and the PHA. This part covers the ITSP as part of the required contents of the contract of participation, and the family's obligations under the contract.

##### 5-I.B. CONTENTS OF THE CONTRACT OF PARTICIPATION

###### Individual Training and Services Plan

There will only ever be one FSS contract of participation (CoP) at any time for each FSS family. As part of the required contents of the FSS contract of participation (CoP), the individual training and services plan (ITSP) establishes specific interim and final goals by which the PHA and the family measure the family's progress toward fulfilling its obligations under the contract of participation and becoming self-sufficient. Interim and final goals will differ depending on the family's individual needs. Regulations require the establishment of a final goal that includes both employment for the head of the FSS family and independence from welfare assistance for all family members regardless of age.

### ***Interim Goals [24 CFR 984.303(b)(2)]***

PHAs must work with each participant to establish realistic and individualized goals and may not include additional mandatory goals or mandatory modifications of the two mandatory goals.

### ***Individual Training and Service Plans for Other than FSS Head [24 CFR 984.103]***

An individual training and services plan is required for the head of the FSS family and all adults choosing to participate. ITSPs must be prepared for each adult family member participating. ITSPs are prepared by the PHA, in consultation with the participating family member [Notice PIH 93-24, G-16.

## **5-I.C. FAMILY OBLIGATIONS**

### **Compliance with Lease Terms [24 CFR 984.303(b)(3)]**

One of the obligations of the FSS family according to the contract of participation is to comply with the terms and conditions of the HCV or public housing lease.

Inability to comply with the lease represents an inability to comply with the contract, therefore regulations regarding noncompliance with the FSS contract apply [see 24 CFR 984.303(b)(5)]. It is up to the PHA to determine the plan of action for FSS families found in noncompliance with the lease and how the PHA will precisely define the term *comply with the lease*. All considerations allowed for other assisted residents regarding violations of the lease, must also be allowed for FSS participants.

#### PHA Policy

The PHA will define *comply with the lease* to mean the FSS family has not been evicted for repeated or serious violations of the lease as defined in the HCV Administrative Plan and public housing Admissions and Continued Occupancy Policy; or if they have been evicted for repeated and serious violations of the lease, the family has pursued their right to grieve, and the family has prevailed in either the grievance hearing or the informal hearing process.

The PHA's FSS program will not terminate the FSS contract of participation for failure to comply with the terms of the lease.

### **Employment Obligation [24 CFR 984.303 (b)(4)]**

Another obligation set forth by the contract of participation is for the head of the FSS family to *seek and maintain suitable employment* during the term of the contract and any extension. Although other members of the FSS family may seek and maintain suitable employment during the term of the contract, it is only a requirement for the head of the FSS family.

The obligation for the head of the FSS family to *seek employment* is defined in the regulatory language as meaning that the head of the FSS family has searched for jobs, applied for employment, attended job interviews, and has otherwise followed through on employment opportunities. However, this definition still leaves room for policy decisions on the part of the PHA because it does not define the level of activity involved in "seeking."

There is no regulatory definition of *maintain suitable employment*. For this reason, it is up to the PHA to define the term. However, there can be no minimum period of time that the head of the FSS family must work.



With the agreement of the FSS family member, the PHA makes a determination of what it means to maintain suitable employment based on the skills, education, and job training of the FSS head of household, receipt of other benefits of the family member, and the available job opportunities within the jurisdiction served by the PHA. This means that the PHA must consult with the family member and agreement must be reached as to what *maintain suitable employment* is for that family member [24 CFR 984.303 (b)(4), Notice PIH 93-24, G-3].

#### PHA Policy

For purposes of the PHA's FSS program, *seek employment* means the head of household has applied for employment, attended job interviews, and otherwise followed through on employment opportunities as outlined in the individual training and services plan of their contract of participation.

*Maintain suitable employment* is employment, on the last day of the contract, that is outlined in the individual training and service plan and is based on the skills, education, job training, and receipt of other benefits of the head of the FSS family. The PHA will require verification of this employment or enrollment.

### **5-1.D. CONSEQUENCES OF NONCOMPLIANCE WITH THE CONTRACT**

Consequences apply for families who do not meet the terms and conditions of the contract. The regulations require that the contract of participation specify that if the FSS family fails to comply, without good cause, with the terms and conditions of the contract (including compliance with the HCV or public housing lease), the PHA may:

- Withhold supportive services
- Terminate the family's participation in the FSS program

PHAs are not permitted to terminate a family's housing assistance due to the family's failure to meet its obligations under the contract of participation [24 CFR 984.101(d)].

#### PHA Policy

The contract of participation (CoP) will be terminated before the expiration of the contract term if the participant fails to meet, without "good cause," their obligations as outlined in the CoP. If the participant fails to meet its obligations outlined in the CoP, the FSS coordinator, or their designee, will first meet with the family to reassess the need for supportive services or a change in the individual training and services plan (ITSP).

If a reassessment of supportive services and a change in the ITSP is not successful in bringing the family in to compliance, the FSS coordinator will reassess the need for, and availability of, supportive services and refer the participant to a knowledgeable professional for a formal assessment of the challenges leading to the noncompliance.

The FSS Coordinator will use this formal assessment to identify and refer to resources that remove the challenge so the participant is able to meet their obligations outlined in the CoP.

Finally, if neither of these alternatives is successful, the FSS coordinator will terminate the CoP for failure to complete the tasks, interim goals, or final goals of the ITSP in a timely manner, and thus failure to complete the obligations outlined in the CoP.

The FSS coordinator will make an exception to the actions in terminating the CoP if the participant can, with the assistance of the FSS Coordinator, demonstrate “good cause” for the failure to meet its obligations as outlined in the CoP.

For purposes of the PHA FSS program, *good cause* includes circumstances beyond the control of the FSS family:

Family circumstances

Death in the family

Serious illness

Medical emergency

Mandatory court appearances

Involuntary loss of employment

Loss of head of household through death, incarceration, or removal from lease

Change in the ITSP improving progress toward economic self-sufficiency

Community circumstances

Significant reduction in workforce (over 20 percent reduction in employment field)

Significant interruption in service delivery (over 3 months interruption)

Provider noncompliance with regulation

Provider unable or unwilling to provide service

Provider offering inferior service

Active pursuit of a current or additional self-sufficiency goal

Resolution of a barrier to employment

Completion of a college degree or technical training

Completion of a work-related certification

Credit repair towards homeownership readiness

## **PART II: CONTRACT SPECIFICATIONS**

### **5-II.A. OVERVIEW**

In addition to making clear the family’s obligations under the program, the contract of participation contains specific terms and conditions, including those governing contract modifications, terminations, and grievance procedures. This part describes those specifications and associated policy.

### **5-II.B. CONTRACT TERM [24 CFR 984.303(c)]**

The initial term of the CoP will run from the effective date through the five-year anniversary of the first reexamination of income that follows the execution date. The CoP will go into effect on the first day of the month following the execution of the CoP.

### **Contract Extension [24 CFR 984.303(d)]**

While the term set forth in the contract of participation is for five years, contract extensions are available. According to regulation, PHAs must for “good cause” extend the term of the contract for a period not to exceed two years for any FSS family that requests an extension of the contract in writing or verbally. The family’s written or verbal (documented by the FSS Coordinator) request for an extension must include a description of the need for the extension. *Good cause* means circumstances beyond the control of the FSS family, as determined by the PHA, such as a serious illness or involuntary loss of employment (further defined by PHA policy in Section 5-I.D.). Extension of the contract of participation will entitle the FSS family to continue to have amounts credited to the family’s FSS account.

### **5-II.C. MODIFICATION OF THE CONTRACT**

The contract of participation (CoP) may be modified, as long as the PHA and the FSS family mutually agree to modify it. This includes modifications in writing with respect to the individual training and services plans (ITSPs), the contract term (See Section 5-II.B. above), and designation of the head of the family [24 CFR 984.303(f)]. The conditions under which the PHA will modify the contract are set forth in the policy below.

#### PHA Policy

In the PHA’s FSS program, the CoP will be modified by mutual agreement between the PHA and the FSS head of household:

When modifications to the ITSP improve the participant’s ability to complete their obligations in the CoP or progress toward economic self- sufficiency.

When the actual end date of the CoP is determined by the effective date of the FSS family’s first reexamination changes the end date of the CoP.

When the designated head of the FSS family ceases to reside with other family members in the assisted unit, and the remaining family members, , designate another family member to be the FSS head of household and receive escrow funds.

When an FSS family moves to the jurisdiction of a receiving PHA that does not have an FSS program and the family may not continue participation in the FSS program, and modification of the FSS contract will allow the family to complete the contract and receive an escrow disbursement or terminate the contract with escrow disbursement.

### **5-II.D. COMPLETION OF THE CONTRACT**

By regulation, the contract of participation is considered to be completed when the head of household is employed and the FSS family has fulfilled all of its obligations under the contract of

participation, including all family members' ITSPs, on or before the expiration of the contract term, including any extension thereof.

Policies on verifying completion of the contract of participation can be found in Section 6-I.C. of this action plan.

#### **5-II.E. TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE**

Even after a family has completed the contract of participation, a PHA may continue to offer appropriate FSS supportive services to a former completed FSS family. If the family still resides in HCV or public housing, these supportive services would be offered for becoming self-sufficient. If the family no longer resides in HCV or public housing, these supportive services would be offered for becoming self-sufficient or remaining self-sufficient. Transitional services for families who no longer reside in HCV or public housing, may only be offered using sources that are not HUD funds or HUD restricted funds [24 CFR 984.303(j)].

##### PHA Policy

The PHA will continue to offer supportive services to a former FSS family who has completed its contract of participation.

#### **5-II.F. TERMINATION OF THE CONTRACT**

##### **Termination of the Contract with Escrow Distribution [24 CFR 984.303(k)]**

The contract of participation will be terminated with escrow distribution before the expiration of the contract term, during any extension of the contract, or at end of the term of the contract if all obligations under such have not been met, when:

- Services that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable, as described in Section 5-II.H. of this Action Plan. This type of termination is also referred to as "nullification" in the FSS regulations at 24 CFR 984.
- The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family; or
- An FSS family in good standing moves outside the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR 982.353) for good cause and continuation of the CoP after the move or completion of the CoP prior to the move is not possible. PHAs must be consistent in their determinations of whether a family has good cause for a termination with FSS escrow disbursement.

##### **Termination of the Contract without Escrow Distribution [24 CFR 984.303(h)]**

The contract of participation may be terminated before the expiration of the contract term and any extension of the contract by the following:

- Mutual consent of the parties
- Failure of the FSS family to meet its obligations under the contract of participation without good cause, including in a HCV FSS program the failure to comply with the contract requirements because the family has moved outside the jurisdiction of the PHA

- The family's withdrawal from the FSS program
- Such other act as is deemed inconsistent with the purpose of the FSS program
- Operation of law

#### PHA Policy

The CoP will be terminated before the expiration of the contract term, and any extension thereof, for any of the following reasons

Mutual consent of the parties.

Family's withdrawal from the FSS program.

Failure of the FSS family to meet its obligations under the contract of participation without good cause. *Good cause* for the purposes of the FSS program is also defined in Section 5-I.D. of this Action Plan.

Such other act as is deemed inconsistent with the purpose of the FSS program.

Operation of law.

The head of the FSS family becomes permanently disabled and other family members will not participate in FSS as the head of the FSS family.

In a HCV FSS program, failure to comply with the contract requirements because the family has moved outside the jurisdiction of the PHA under portability without continued FSS participation.

If the FSS family faces termination due to failing to meet, without good cause, its obligations under the CoP, the PHA will follow the relevant policy specified in Section 5-I.D. of this action plan.

**Note:** If the family is unable to meet the requirements of the contract of participation because essential services are not available, the contract is *nullified*, not terminated.

In addition, the contract of participation is automatically terminated if the family's HCV assistance is terminated in accordance with HUD requirements [24 CFR 984.303(h)].

#### **5-II.G. OPTION TO WITHHOLD SUPPORTIVE SERVICE [24 CFR 984.303(b)(5)(i)]**

As touched upon in Section 5-I.D. of this action plan, the PHA has the option to withhold supportive services or the FSS family's participation in the FSS program if the PHA determines that the FSS family has failed to comply without good cause with the requirements of the contract of participation.

PHAs are not permitted to terminate HCV assistance to a family due to the family's failure to meet its obligations under the contract of participation [24 CFR 984.101(d)].

#### **5-II.H. PHA OBLIGATION TO MAKE GOOD FAITH EFFORT TO REPLACE UNAVAILABLE SUPPORT SERVICES [24 CFR 984.303(e)]**

PHAs must make an extensive good faith effort to replace services that community agencies either cannot or will not provide. If all of the steps below are exhausted without the provision of an integral service, the contract of participation can be ended ahead of time as a result. This,

however, should only occur as a last resort. The PHAs good faith effort must be demonstrated by taking the following steps:

- If a social service agency fails to deliver the supportive services pledged under an FSS family member's individual training and services plan (ITSP), the PHA must make a good faith effort to obtain these services from another agency.
- If the PHA is unable to obtain the services from another agency, the PHA must reassess the family member's needs and determine whether other available services would achieve the same purpose.
- If other available services would not achieve the same purpose, the PHA shall determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.
- If the unavailable services are not integral to the FSS family's advancement toward self-sufficiency, the PHA must revise the ITSP, delete these services, and modify the contract of participation to remove any obligation on the part of the FSS family to accept the unavailable services.
- If the unavailable services *are* determined to be integral to the FSS family's advancement toward self-sufficiency (which may be the case if the affected family member is the head of the FSS family), the PHA shall terminate the contract of participation and follow the requirements in Section 5-II.F. of this Action Plan.

Termination of the contract of participation based on unavailability of supportive services shall never be grounds for termination of HCV or public housing assistance.

## **5-II.I. GRIEVANCE PROCEDURES**

When adverse action is taken by the PHA against a family, the PHA is required to provide a grievance hearing in the public housing program, or an informal hearing in the HCV program [24 CFR 966 subpart B, 24 CFR 982.554].

According to regulatory requirements, the FSS action plan must contain the grievance and hearing procedures available for FSS families against whom the PHA has taken adverse action with regards to FSS [24 CFR 984.201(d)(9)].

### PHA Policy

The grievance and informal hearing procedures for the FSS program will be the same as the grievance and hearing procedures adopted for the HCV and public housing programs in the PHA's admissions and continued occupancy policy and administrative plan, respectively (See pages 317-321 in the ACOP and pages 347-352 in the Administrative Plan).

Adverse actions taken within the FSS program include:

Denial of admission into the FSS program

Denial of request for supportive services

Denial of request to change the ITSP

Denial of request to change the head of household

Denial of request for interim disbursement of the escrow account  
Denial of request to complete the CoP  
Denial of a request for extension to the FSS CoP  
Denial of request for either interim or final distribution of escrow account  
Withholding of support services  
Termination of the FSS CoP  
Denial of request for termination with escrow  
Denial of transitional services

## Chapter 6

### ESCROW ACCOUNT

#### INTRODUCTION

The establishment of an escrow account is offered as a support and financial incentive to families for participation in the FSS program. Generally, under this incentive, the amount of an increase in family rent resulting from an increase in earned income is escrowed. That is, usually a family's rent or share of the rent goes up when the family experiences an increase in earned income. In the FSS program, this is still the case, and the part of the rent representing the increase is deposited into an account as an escrow credit. The funds from this escrow account then become available to FSS families upon successful completion of their contracts of participation and may become available earlier at the housing authority's option.

This chapter explains how the FSS escrow account works, including calculating the amount of the escrow credit, disbursing the funds, and the proper way for the PHA to manage and report on the account.

This chapter contains two parts:

Part I: The Escrow Account: This part provides an overview of how the escrow account works, including calculating the escrow credit and disbursing the funds upon completion of the contract of participation.

Part II: Escrow Fund Accounting and Reporting: This part describes the requirements for managing the escrow account, including both accounting and reporting requirements.

#### PART I: THE ESCROW ACCOUNT

##### 6-I.A. OVERVIEW

As an integral incentive to the FSS program, it is especially important to have clear-cut policy spelling out how the escrow account works. This includes policy regarding the calculation of the FSS credit amount, the disbursement of FSS account funds, the use of account funds for homeownership, and forfeiture of the FSS escrow account.

##### 6-I.B. CALCULATING THE FSS CREDIT AMOUNT

###### **Determination of Baseline Annual Earned Income and Baseline Monthly Rent**

When determining the family's baseline annual earned income and the baseline monthly rent amounts for purposes of computing the FSS escrow credit, the PHA must use the amounts on the family's most recent income reexamination in effect.

For purposes of determining the FSS credit, baseline monthly rent for families paying an income-based rent is the family's Total Tenant Payment (TTP) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract.

For families in public housing who are paying either flat or ceiling rent, family rent is the amount of the flat rent (including the applicable utility allowance) or ceiling rent (including any hardship



discounts) as of the most recent reexamination of income, which occurs after the effective date of the FSS contract [24 CFR 984.103(b)].

### **Determination of the Escrow Credit**

To calculate the FSS credit, the PHA must accurately determine the family's baseline earned income and baseline monthly rent and compare those figures with the family's current earned income and current monthly rent. The FSS credit is the lesser of 30 percent of one-twelfth or 2.5 percent of the amount by which the family's current annual earned income exceeds the family's baseline annual earned income; or the increase in the family's monthly rent. The increase in the family's monthly rent is the lower of either the amount by which the family's current monthly rent exceeds the family's baseline monthly rent, or for HCV families, the difference between the baseline monthly rent and the current gross rent (*i.e.*, rent to owner plus any utility allowance) or the payment standard, whichever is lower [24 CFR 984.305(b)(2)].

### **Determination of Escrow Credit for Families Who Are Not Low Income**

FSS families who are not low-income families are not entitled to any FSS credit [24 CFR 984.305(b)(2)].

### **Increases in FSS Family Income [24 CFR 984.304]**

As described in the FSS credit calculations above, any increases in family earned income resulting in increases in family rent are deposited in the escrow account. For this reason, and because of the nature of the FSS account, any increase in the earned income of an FSS family during its participation in an FSS program may not be considered as income or an asset for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD.

### **Cessation of FSS Credit [24 CFR 984.305(b)(4)]**

The PHA will not make any additional credits to the FSS family's FSS account when the family has completed the contract of participation, when the contract of participation is terminated, when the family is not low-income, or during the time a HCV family is in the process of moving to a new unit.

## **6-I.C. DISBURSEMENT OF FSS ACCOUNT FUNDS**

### **Disbursement Before Completion of Contract**

The PHA may at its sole option disburse FSS account funds before completion of the contract if the family needs a portion of the funds for purposes consistent with the contract of participation and the PHA determines that the FSS family has fulfilled certain interim goals established in the contract of participation. These interim disbursements could include using the funds to assist the family in meeting expenses related to completion of higher education (e.g., college, graduate school) or job training, or to meet start-up expenses involved in creation of a small business [24 CFR 984.305(c)(2)(ii)].

#### PHA Policy

The PHA will disburse a portion of the FSS escrow account funds before completion of the CoP when the family has met certain interim goals, which means the family has met

all its obligations under the CoP to date, including completion of the ITSP interim goals and tasks to date, and:

Requested funds are needed to complete an interim goal or task within the CoP and are not ongoing expenses.

**OR**

The family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

**Disbursement at Completion of Contract [24 CFR 984.305(c)(1) and 24 984.305(c)(2)(i)]**

When the contract has been completed, at or before the expiration date, according to regulation, the amount in the FSS account in excess of any amount the FSS family owes to the PHA will be paid to the head of the FSS family. To receive the disbursement, the head of the FSS family must submit a certification (as defined in 24 CFR 984.103) to the PHA at the time of contract completion that, to the best of his or her knowledge and belief, no member of the FSS family is a recipient of welfare assistance.

**Disbursement at Contract Termination [24 CFR 984.305(c)(3)]**

The PHA must disburse to the family its FSS escrow account funds in excess of any amount owed to the PHA when the contract has been terminated in certain circumstances. These circumstances include services are not available to the family that the PHA and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency, when the head of the FSS family becomes permanently disabled and unable to work during the period of the contract (unless the PHA and the FSS family determine that it is possible to modify the contract to designate a new head of the FSS family), or when an FSS family moves outside the jurisdiction of the PHA and continuation of the CoP after the move is not possible according to the regulations. In circumstances where a family is not able to continue in FSS after the move, it is also possible for the PHA and the family to determine if the contract can be modified to make completion and receipt of the escrow monies, possible. PHAs must be consistent in their determinations of whether a family has good cause for a termination with FSS escrow disbursement.

**Verification of Family Certification at Disbursement**

The PHA must verify that the family has met the requirements of either interim, final, or termination of contract with escrow. Interim disbursement may only occur after the family has completed certain interim goals and funds are needed to complete other interim goals. Final disbursement can only occur after the family has completed the contract of participation and all members are welfare-free as defined by regulation. Disbursement at contract termination only occurs if the family circumstances involve an integral missing service, the disability of the FSS head of household, or an FSS family porting out of the jurisdiction of the PHA and HUD regulations do not allow continuation of the FSS contract. In each of these circumstances, it follows that the PHA may require verification for the completion of interim goals or the contract of participation.

At interim disbursement and before final disbursement of the FSS account funds to the family, the PHA must verify that the FSS family is no longer a recipient of welfare assistance by requesting copies of any documents which may indicate whether the family is receiving any welfare assistance, and by contacting welfare agencies [24 CFR 984.305(c)(4)].

HUD provides verification guidance in Notice PIH 2018-18. This guidance is mandatory for the HCV and public housing programs. The PHA's Administrative Plan or ACOP must contain verification policies following the hierarchy in this notice. The policies contained in the PHA's ACOP and Administrative Plan cover verification policies related to the FSS program in general. However, determining the need for interim disbursements may require more clarification as to what constitutes an acceptable third-party source.

#### PHA Policy

The PHA will require verification that the FSS family has completed certain interim goals, has completed the contract of participation, has met the requirements for termination with disbursement of escrow and that the FSS family is no longer a recipient of welfare assistance, as relevant, before making interim and final disbursements.

The PHA will follow HUD's verification hierarchy set forth in Notice PIH 2018-18 to make these verifications, including the guidance therein regarding documentation. However, the PHA will use a *knowledgeable professional* as a third-party source to verify the need for interim disbursements.

#### **Succession to FSS Account [24 CFR 984.305(d)]**

FSS account funds should be disbursed to the head of the FSS family. However, if the head of the FSS family no longer resides with the other family members in HCV or public housing, the remaining members of the FSS family, after consultation with the PHA, have the right to designate another family member to receive the funds.

#### **6-I.D. USE OF FSS ACCOUNT FUNDS FOR HOMEOWNERSHIP**

According to regulation, a HCV or public housing FSS family may use their the final distribution of FSS account funds for the purchase of a home, including the purchase of a home under one of HUD's homeownership programs, or other federal, state, or local homeownership programs, unless the use is prohibited by the statute or regulations governing the particular homeownership program [24 CFR 984.305(e)].

Homeownership is just one option for use of the FSS account funds. PHAs may not restrict the use of escrow funds at contract completion [Notice PIH 93-24, C-13].

#### **6-I.E. USE OF FORFEITURE OF FSS ACCOUNT FUNDS**

Amounts in the FSS account will be forfeited when the contract of participation is terminated without escrow disbursement, or when the contract of participation is completed by the family (see Section 5-II.D. of this action plan) but the FSS family is receiving welfare assistance at the time of expiration of the term of the contract of participation, including any contract extension [24 CFR 984.305(f)(1)].

Use of forfeited escrow accounts is described in detail in Section 3-I.F. of this FSS Action Plan.

#### **Treatment of Forfeited FSS Account Funds**

FSS escrow account funds forfeited by the FSS family must be used by the PHA for the benefit of the FSS participants. These funds may only be used for support for FSS participants in good standing. These supports include transportation, childcare, training, testing fees, employment preparation costs, and other costs related to achieving obligations outlined in the CoP; or training for FSS Program Coordinator(s). Forfeited FSS escrow accounts may not be used for salary and fringe benefits of FSS Program Coordinators, general administrative costs of the FSS program, for housing assistance payments (HAP) expenses or public housing operating funds.

## **PART II: ESCROW FUND ACCOUNTING AND REPORTING**

### **6-II.A. OVERVIEW**

Regulations set forth specific requirements involving the accounting and reporting for the FSS escrow account. This part describes those requirements and the PHA policy necessary for managing the account from the PHA perspective.

### **6-II.B. ACCOUNTING FOR FSS ACCOUNT FUNDS**

When establishing FSS escrow accounts, the PHA must deposit the FSS account funds of all families participating in the PHA's FSS program into a single depository account for each (HCV or public housing) program. These funds are determined at each reexamination after the effective date of the contract and must be deposited each month to each family's subsidiary line item in the PHA's escrow account. In addition, the funds held in this account must be invested in one or more of the HUD-approved investments [24 CFR 984.305].

#### **Crediting the Escrow Account [24 CFR 984.305(a)(2)(i)]**

The total of the combined FSS account funds will be supported in the PHA accounting records by a subsidiary ledger showing the balance applicable to each FSS family. During the term of the contract of participation, the PHA must credit the amount of the FSS credit (see Section 6-I.B.) to each family's FSS account every month.

#### **Proration of Investment Income [24 CFR 984.305(a)(2)(ii)]**

Because the FSS account funds are to be invested, the investment income for those funds in the FSS account will also need to be credited to each family's account subsidiary line item. By regulation, these funds are to be prorated and credited to each family's FSS account based on the balance in each family's FSS account at the end of the period for which the investment income is credited.

#### **PHA Policy**

Each quarter the full amount of the investment income for funds in the public housing and HCV FSS account will be prorated and credited to each family's subsidiary line item after the deduction of unpaid rent and other amounts due under the public housing and HCV lease.

#### **Reduction of Amounts Due by FSS Family [24 CFR 984.305(a)(2)(iii)]**

If the FSS family has not paid the family contribution towards rent, or other amounts, if any, due under the public housing or HCV lease, the balance in the family's FSS account shall be reduced by that amount (as reported by the owner to the PHA in the HCV FSS program) at the time of final disbursement of FSS escrow funds. If the FSS family has underreported income after the

baseline annual income is set, the amount credited to the FSS account will be based on the income amounts originally reported by the FSS family.

If the FSS family is found to have under-reported income in the reexamination used to set the baseline, the escrow for the entire period of the CoP will be recalculated using the correct income to set the baseline and then calculate subsequent escrow amounts.

#### **6-II.C. REPORTING ON THE FSS ACCOUNT**

Each PHA must make a report, at least once annually, to each FSS family on the status of the family's FSS account.

At a minimum, the report must include [24 CFR 984.305(a)(3)]:

- The balance at the beginning of the reporting period
- The amount of the family's rent payment that was credited to the FSS account, during the reporting period
- Any deductions made from the account for amounts due the PHA before interest is distributed
- The amount of interest earned on the account during the year
- The total in the account at the end of the reporting period

##### PHA Policy

The PHA will provide FSS participants an annual statement on the status of their FSS escrow account.

## Chapter 7

### PORTABILITY IN HCV FSS PROGRAMS

#### INTRODUCTION

PHAs operating HCV FSS programs must be familiar with the rules and regulations regarding portability under the HCV program. As with the case of portability in the HCV program in general, the FSS family may move outside the initial PHA jurisdiction under portability procedures after the first 12 months of the FSS contract of participation [24 CFR 984.306].

In the event that an FSS family chooses to exercise portability, certain special requirements regarding the FSS program would apply. This chapter describes the obligations of the initial PHA, the receiving PHA, and the FSS family under portability, in addition to any special stipulations regarding portability in the FSS context.

This chapter contains two parts:

Part I: Portability in the FSS Program: This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

Part II: The Effects of Portability on FSS Regulations and Policy: This part describes the specific ways in which portability affects different aspects of the FSS program, including the escrow account, program termination, loss of the FSS account, and termination of HCV program assistance.

#### PART I: PORTABILITY IN THE FSS PROGRAM

##### 7-I.A. OVERVIEW

Portability is a statutory feature of the HCV program—it is included in the law. As such, PHAs operating an HCV FSS program need to understand the effects that portability will have on HCV FSS families and program operation. This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

##### 7-I.B. DEFINITIONS

For the purposes of portability with regards to the FSS program, the following definitions will be used [24 CFR 982.4, 24 CFR 984.306].

- *Initial PHA* means both:
  1. A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and
  2. A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

- *Receiving PHA* means a PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA either absorbs the family into its program, including issuing a voucher and providing rental assistance to the family, or bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher.
- *Relocating FSS Family* refers to an FSS family that moves from the jurisdiction of a PHA at least 12 months after signing its contract of participation.

## **7-I.C. RESIDENCY REQUIREMENTS**

Families participating in a HCV FSS program are required to lease an assisted unit within the jurisdiction of the PHA that selected the family for the FSS program for a minimum period of 12 months after the effective date of the contract of participation. However, the initial PHA may approve a family's request to move outside its jurisdiction under portability during this period if the move is in accordance with the regulations at 24 CFR 982.353 [24 CFR 984.306(a)(1)].

### PHA Policy

The PHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation if the move is in accordance with the regulations for such moves at 24 CFR 982.353.

After the first 12 months of the FSS contract of participation, the FSS family may move outside the initial PHA jurisdiction under portability procedures regardless of PHA approval [24 CFR 984.306(a)(2)].

## **7-I.D. PORTABILITY REQUIREMENTS FOR FSS PARTICIPANTS**

### **Receiving PHA Administers an FSS Program [24 CFR 984.306(b)]**

Whether the receiving PHA bills the initial PHA or absorbs the FSS family into its HCV program, the receiving PHA must enroll an FSS family in good standing in its FSS program. However, if the receiving PHA is already serving the number of FSS families identified in its FSS Action Plan and determines that it does not have the resources to manage the FSS contract or the receiving PHA, the initial PHA may agree to the FSS family's continued participation in the initial PHA's FSS program. Prior to the PHAs agreeing to the continued participation, the initial PHA must determine that the relocating FSS family has demonstrated that, notwithstanding the move, it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

### PHA Policy

The PHA, as the initial housing authority, will agree to the participant's continued participation in their FSS program so long as the relocating family has demonstrated, with the assistance of the FSS Coordinator, that it will be able to fulfill its responsibilities under the initial or a modified contract at its new place of residence.

Where continued FSS participation is not possible, the initial PHA **must** clearly discuss the options that may be available to the family. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority

that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

#### PHA Policy

The PHA will clearly discuss the options that are available to the family where continued FSS participation is not possible. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

#### **Receiving PHA Does Not Administer an FSS Program [24 CFR 984.306(c)]**

If the receiving PHA does not administer an FSS program, the FSS family may not continue participation in the FSS program. The initial PHA must clearly discuss the options that may be available to the family. These may include, but are not limited to, modification of the FSS contract, locating a receiving PHA that administers an FSS program, termination of the FSS contract with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

#### PHA Policy

The PHA will, as stated above, clearly discuss the options that may be available to the family where continued FSS participation is not possible. Depending on the family's contract specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement in accordance with 24 CFR 984.303(k)(1)(iii), or termination of the FSS contract and forfeiture of escrow.

#### **Single Contract of Participation**

If the FSS family enrolls in the receiving PHA's FSS program, the receiving PHA will enter a new contract with the FSS family for the term remaining on the contract with the initial PHA. The initial PHA will end its contract with the family.

If the FSS family remains in the FSS program of the initial PHA, pursuant to this section, the contract executed by the initial PHA will remain as the contract in place.

#### **Termination of FSS contract and Forfeiture of Escrow Account [984.306(e)]**

If an FSS family relocates to another jurisdiction and is unable to fulfill its obligations under the contract, including any modifications, the PHA, which is a party to the contract, **must terminate the FSS family from the FSS program**. The family's FSS escrow account will be forfeited.

Termination of FSS program participation and forfeiture of FSS escrow must be used only as a last resort after the PHA determines, in consultation with the family, that the family would be unable to fulfill its obligations under the contract after the move, that locating another receiving housing authority with a FSS program is not possible, that the current contract cannot be modified to allow for completion prior to porting, and that the current contract cannot be terminated with FSS escrow disbursement. When termination is the only option, the PHA must clearly notify the family that the move will result in the loss of escrow funds. The PHA must follow its policy for clearly notifying the FSS family of the forfeiture.



## **7-I.E. NEW FSS ENROLLMENT INTO RECEIVING PHA'S FSS PROGRAM**

### **Administering and Billing of the Voucher**

If the receiving PHA bills the initial PHA, the receiving PHA may, consistent with the receiving PHA's FSS enrollment policies, enroll a family that was not an FSS participant at the initial PHA into its FSS program, but only if the initial PHA manages an FSS program and agrees to such enrollment. If the receiving PHA bills the initial PHA, but the initial PHA does not manage an FSS program, the family may not enroll in the receiving PHA's FSS program.

#### PHA Policy

The PHA will clearly discuss the options that are available to the family where continued FSS participation is not possible. Depending on the family's specific circumstances, these options include modification of the FSS contract, locating a receiving housing authority that has the capacity to enroll the family in its FSS program, termination with FSS escrow disbursement, or termination of the FSS contract and forfeiture of escrow.

### **Absorption of the Voucher**

If the receiving PHA absorbs the family into its HCV program, the receiving PHA may, consistent with the receiving PHA's FSS enrollment policies, enroll a family that was not an FSS participant at the initial PHA into its FSS program.

## **PART II: REPORTING**

### **7-II.A. OVERVIEW**

Each PHA that carries out an FSS program shall submit to HUD, in the form prescribed by HUD, a report regarding its FSS program.

### **7-II.B. CONTENTS OF THE FSS REPORT [24 CFR 984.401]**

The report submitted to HUD must include a description of the activities carried out in the FSS program; a description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency, including the number of families enrolled and graduated and the number of established escrow accounts and positive escrow balances; a description of the effectiveness of the program in coordinating resources of communities to assist families to achieve economic independence and self-sufficiency; and any recommendations by the PHA or the appropriate local Program Coordinating Committee for legislative or administrative action that would improve the FSS program and ensure the effectiveness of the program.

### **7-II.C. FAMILY SELF-SUFFICIENCY GRANT PROGRAM REVIEW PHA SELF-ASSESSMENT**

HUD provides a detailed checklist for PHAs to conduct their own self-assessment of their FSS program. The form is administered by the local field office and allows each PHA to gather concrete and comprehensive data covering aspects of the program from FSS Action Plans and Composite Scores through FSS program size, participants, and graduations to reductions in FSS grants and current Memoranda of Agreement with community partners. The detailed example of

the FSS Self-Assessment is available at HUD's FSS Resource page, which can be located by searching "HUD FSS" on any browser.

**CHARLOTTESVILLE  
REDEVELOPMENT & HOUSING  
AUTHORITY**

**HOUSING MANAGEMENT &  
MAINTENANCE POLICY**

**DRAFT**

# MAINTENANCE PLAN

## A. General Performance Standards

1. Respond to Resident generated service requests within three (3) days maximum;
2. Respond to emergency service requests on the same day as received- within a 24 hour maximum;
3. Adhere to a documented Preventive Maintenance Program;
4. Inspect all units for Preventive Maintenance annually;
5. Complete all scheduled Preventive Maintenance inspection in a timely fashion;
6. Adopt and adhere to a cyclical painting program;
7. Prepare vacant units for occupancy within five (5) working days maximum;
8. Provide Maintenance Staff with access to all necessary tools, equipment, supplies, and materials.
9. Assure that problems and discussions regarding Residents will stay in the office and will not be shared with other Residents or general public or friends or family.

## B. Maintenance Priorities

Maintenance work shall be performed according to the following priority of work order categories:

1. **Emergency Maintenance**---these are items that if not repaired promptly could cause injury, loss of life, threaten health or cause serious property damage such as:
  - a. Broken gas line or leak
  - b. Fires
  - c. Loss of power
  - d. Broken Water lines
  - e. Exposed electrical lines
  - f. Loose ceilings
  - g. No heat (when temperature is less than 40 degrees Fahrenheit)
  - h. Broken door locks
  - i. Other conditions that might cause harm to the Resident or others or damage to property.

**Emergency work will be accomplished during the current work day.**

2. **Resident Service Maintenance**—items in this category are all work initiated as a result of Resident requests and include:
- a. Electrical repairs
  - b. Plumbing repairs
  - c. Broken window panes
  - d. Floor tile repair

**Resident service Maintenance is to be performed within three (3) working days**

3. **Routine Maintenance**—includes ongoing regularly scheduled Maintenance activities intended to maintain the decent, safe and sanitary nature of the housing and to maintain curb appeal of the property. Includes:
- a. Extermination and Pest Control  
Applying the seven (7) principles for “Healthy Homes” sponsored by National Center for Healthy Housing:
    - Keep it Clean
    - Keep it Dry
    - Keep it Ventilated
    - Keep it Safe
    - Keep it Pest Free – using IPM method (Integrated Pest Management)
    - Avoid Contamination
    - Maintain the Home
  - b. Janitorial and Grounds Cleaning
  - c. Trash Collection
  - d. Lawn care/Landscaping
4. **Vacant Units Turnover**—includes all work necessary to prepare a vacant unit for occupancy by a new Resident.

**Units needing minor rehabilitation shall be made ready within five (5) calendar days**

5. **Planned/Preventive Maintenance**— includes activities based on regular, scheduled, and methodical inspection of dwelling units, buildings, equipment, and major systems. These inspections are designed to maintain Housing Authority managed property in good repair and

to appreciably extend its useful life by ensuring repairs are made prior to deterioration and actual breakdown, thereby minimizing both damage and repair costs.

### **C. Work Order System**

1. Policies
  - a. Maintenance Staff will make no repairs without an authorizing work order form.
  - b. Repairs are to be performed within the time frames established in the General Performance Standards (see A)
2. Procedures
  - a. A completed work order will include:
    - 1) Date and time issued to person or entity to do the work
    - 2) Unit number
    - 3) Detailed description of work to be done
    - 4) Date and time the work is satisfactorily completed
    - 5) The parts used to complete the repairs and the cost of the parts
    - 6) Whether the damage was caused by the Resident and the charges to the Resident for Resident-caused damage.
    - 7) Signature of intake person
  - 8) Signature of Resident on completed of Work Orders
    - a. Be sure to leave a copy of the work order when the resident is not at home and secure the unit.
    - b. Work orders will be issued by Management or the Work Order clerk and entered into a log which indicates at all times the status of all work orders as to type (emergency, non-emergency) when issued, and when completed.
    - c. A non-emergency routine work order is any work order that covers a situation that is not an immediate threat to life, health, safety, or property, or that is unrelated to fire safety.
    - d. Emergency work orders are for situations that pose an immediate threat to health or safety, and take highest priority. (See B1)

- e. The majority of work requests initiated by the Housing Authority Staff will be those attributable to preventive, or planned Maintenance, or unit inspections. These work orders are handled as routine work orders.
- f. Maintenance Staff will routinely pick up work orders throughout the day.
- g. Any time throughout the day that Staff is near or at office, they will check for additional work orders or call to see if there where any emergency call ins.
- h. In so far as possible, Maintenance Staff will be issued parts and supplies needed to complete assigned work orders at the time they are assigned the work order.
- i. Procedure when entering a unit
  - 1) Staff will first knock on the door, state the purpose of the visit and politely ask for admittance.
  - 2) If no one is home, Staff is to let themselves in, perform the work and/or inspection, and leave a note and secure the unit before leaving.
  - 3) If the Resident is at home, the Staff will ask if there is anything they missed that requires Maintenance.
  - 4) Staff then fills out the Work Order/Inspection form and notes whether each element requiring attention:
    - a) Was in good repair
    - b) Was clean
  - 5) Staff makes a note of completed work order or that additional work is needed and whether items that will require additional work will require additional work orders
- j. Maintenance Staff will make note, while in a unit or on site, of excessive poor housekeeping habits, or children left unattended, excessive damages or repeated damages, and infestation. These will be noted on the work order and Management notified immediately.

- k. A work order deferred for modernization is any work order that is combined with similar work items and completed within the current PHAS assessment year, or will be completed in the following year if there are less than three months remaining before the end of the Housing Authority fiscal year when the work order was generated.
- l. Work orders will be filed in numerical order in a Maintenance file and a copy will be filed in the resident file
- m. Notice of charges are mailed to the resident being charged
- n. Ten percent (10%) of all completed work orders shall be checked by the Maintenance Supervisor, or Inspector or on site manager for quality of work. Use specified log for documentation

**D. Assessing Resident Maintenance Charges**

- 1. Residents will be assessed a charge for repairs made to their dwelling units in excess of what is required for normal wear and tear and damage which is caused by the resident, members of the household, guests, or by neglect.
- 2. Charges will be made according to the Schedule of Other Charges posted on the Authority bulletin board.
- 3. If a Resident calls an unauthorized person to work on their unit or appliances, etc., and it is not an emergency to which a Maintenance Staff is unable to tend, the Resident will be responsible for the cost of that repair the Housing Authority will NOT be liable for the cost.

**E. Emergency Maintenance Procedures**

- 1. The Maintenance Supervisor/Lead Maintenance will be contacted immediately
- 2. Maintenance Supervisor/Lead Maintenance will immediately go to location and verify existence of an emergency situation
- 3. Maintenance Supervisor/Lead Maintenance will determine whether the work can be done in house or requires contract services



4. If the matter cannot be resolved quickly, emergency status can be abated by transferring the resident away from the emergency situation.
5. Emergency work orders will be turned in immediately upon completion.
6. If situation is determined not to be an emergency, the resident will be informed that request will be considered as any other routine resident request.

## **F. Routine Maintenance Procedures (Ongoing)**

### **1. Extermination**

- a. The Housing Authority extermination will be provided by the secured contracted services through a licensed pest control company to maintain an efficient and effective pest control program. This must include ***trash rooms, compactor areas and trash chutes on regular scheduled basis- meaning each visit to development.***
- b. The Maintenance Staff will program and schedule extermination (including extermination of cockroaches) requirements for each development.
- c. The Housing Authority Staff will be furnished approved schedules by the elected contractor thirty (30) days prior to the first extermination date.
- d. Management is responsible for notifying the Residents and assuring that units are properly prepared.
- e. All developments will be completely treated for pests within a one (1) year cycle.
- f. Rodent Control  
  
Properties will be baited for rodent extermination as needed and/or requested by management.
- g. Management will take precautionary measures to assure that Residents are aware of the antidote for the rodent poison use.
- h. Unscheduled Pest extermination will be made upon request.

## **2. Janitorial and Grounds Cleaning**

### **a. Sweeping and mopping of Public Areas**

All public corridors will be broom swept and mopped daily. Whenever possible, this operation will be performed in the mornings when resident traffic is the lightest.

### **b. Cleaning Grounds and Landscaped Areas**

1) The policing of landscaped areas is best performed by a worker equipped with a shoulder bag and metal tipped spear or other comparable equipment. The worker will wear gloves for protection when removing trash from the spear. Paper, small cardboard cartons, and miscellaneous trash will be speared and deposited in the bag or other approved container.

2) Large pieces of paper and miscellaneous trash, such as clothes hangers, too cumbersome for the bag, will be deposited in the nearest stationary waste basket or dumpster.

3) Litter found with names of residents will be noted and reported to the Housing Authority office so that notices can be mailed to the resident about the litter and charges, if applicable.

### **c. Cleaning of walks, roads, playgrounds, parking areas, on paved/hard surfaces where cars, benches, and play equipment is prevalent, best results are attained by manual sweeping. These areas will be power washed on an as needed basis.**

## **3. Trash Collection**

The Housing Authority will provide periodic trash collection at a frequency required to maintain the development in a sanitary condition with required resident cooperation.

- Trash collection will be provided by the Housing Authority on a scheduled basis
- Trash collection will be provided by a private firm under contract to the Housing Authority on a scheduled basis. These contracts will be renewed periodically.

#### **4. Landscape -**

- Check property for ant problems and treated with granules as needed
- Inspect and water flowering landscaping as needed

### **G. Vacant Unit Turnaround Procedure**

1. It is the policy of the Housing Authority to prepare vacant units for re-occupancy within a maximum of five (5) working days.
2. As soon as a vacant unit is reported to Maintenance, plans will be made to inspect, repair, paint, and clean as needed.
3. If the resident is available, the resident will certify the condition of the unit on the Unit Inspection form.
4. In cases where the resident vacates without notice, the Maintenance Staff shall perform the move-out inspection within 24 hours of learning of the vacancy.
  - a. Staff will note all items which must be repaired and/or cleaned, and determine any damages to be charged to the resident's account.
  - b. Following inspection, the Maintenance Staff shall determine which work orders must be prepared.
5. Make-Ready Steps
  - a. Secure the unit and change the cylinders on the unit doors and mailbox locks. The keys to the old cylinders should be tried in both the old unit and mailbox locks to ensure their proper operation. If satisfactory, the old cylinders and keys

should be retained for re-use somewhere else at a later date.

- b. (1) Remove range and refrigerator, if applicable  
(2) Clean/repair range and refrigerator thoroughly
- c. Exterminate
- d. Remove debris and clean
- e. Remove old name plates from the mail box, directory, and unit entrance door
- f. Remove all picture hooks, nails, curtain hooks and rods, shower curtain rings, etc.
- g. Plaster and caulk as required, especially nail holes
- h. Replace or repair torn shades or blinds for proper operation  
(If the shade roller has lost spring tension, shades should be pulled down, removed from brackets, rewound manually, and reinstalled)
- i. Clean all light fixtures, windows, and shades/blinds
- j. Replace cracked, broken, missing, or loose ceramic tile
- k. Repair Floor. Repair or replace missing asphalt tile. Mop the floor free of dirt, wax, scuff marks, etc. Excessive build-up of wax deposits should be removed. Do not patch floor tile with different pattern or color in open view.
- l. Replace wash basins that have chipped surfaces and cannot be repaired
- m. Clean plumbing fixtures and cabinets thoroughly; Lemon Oil wood.
- n. Return the clean/repared range and refrigerator to the unit when leased, if applicable.
- o. Final extermination (if needed)

- q. A completed inspection form and resident charges will be delivered to the Housing Authority office Staff as soon as unit is ready to be released
- 6. Circumstances will occur that will cause the Staff to exceed the 5 working day standard for unit preparation. These are individual exceptions and will not affect overall Housing Authority performance of this function. These circumstances shall include the following categories:
  - a. Fire damaged units
  - b. Developments where there are more than five (5) vacated units in one week
  - c. Contract work is necessary
  - d. Major rehabilitation of vacant units (such as modernization)
- 7. If any one of the following work items is required in the vacant unit, it shall be classified as a major rehabilitation:
  - a. Replace roof
  - b. Replace/repair entire plumbing system
  - c. Replace wall studs
  - d. Electrical re-wiring
  - e. Replace bathtub
  - f. Replace floor joists in any one room
  - g. Replace carpet or floor tile if it poses a tripping hazard
  - h. Excessive damage from prior tenant
- 8. The Maintenance Staff and Management shall perform the final inspection.
- 9. Following this inspection, Management Staff shall accept the unit as complete if all work is completed to their satisfaction. If the unit is not accepted, the Maintenance Staff must see that the desired work is completed and schedule another final inspection. Acceptance of the unit is at the discretion of Management and it is expected that this discretion shall be exercised reasonably.

**H. Planned and Preventive Maintenance Procedures Include:**

- Replacing of air conditioning filters on a regularly rotated schedule for each apartment to be done every sixty (60) days
- Schedule cleaning of coils, checking of wire connections, etc. to air conditioning units prior to May
- Check for water consumption items, such as leaky faucets in kitchen

and/or bathroom, running commodes, leaks at washer connections where applicable

**I.**

**1. Annual Unit Inspections**

- a. Each occupied unit will be inspected annually by Inspection Department. The private companies, Manager or Foreman will conduct the inspection and follow UPCS/NSPIRE guide line. All departments will provide a list of units that will be inspected in the upcoming weeks to the Asset & Housing Manager. The inspection department or manager will notify the resident of the inspection by sending a letter at least forty-eight (48) hours prior to the inspection.
- b. The Inspector who is conducting the inspection will use the Authority's Inspection Form.
- c. When major work items are found, they should be listed on the Inspection Form in sufficient detail to enable the preparation of a work order.
- d. Unusual conditions should also be reported to the Housing Authority Staff in writing on the Inspection Form.
- e. The following items will be checked during the inspection:
  - 1) Faucets - faucets will be inspected for their general condition (peeling, faded chrome, drips, etc.) Faucet handles should be adjusted for proper closure. If proper closure cannot be obtained, the washers on both the hot and cold water spindles will be replaced. When washers are changed, the faucet seat will also be replaced. On faucets equipped with non-renewable seats, defective seats will be ground to a smooth surface.
  - 2) Ranges - ranges will be inspected for oven door closure, knobs, flame adjustments, gas cock adjustments, oven spring tension, and top and oven burner condition. Defects will be corrected immediately. If the range is found to be in poor condition, defects will be corrected immediately. If the range is found to be in poor or dirty condition because

of resident neglect or lack of care, the problem will be reported on the Inspection Form and reported to the Maintenance Staff.

- 3) Hardware - entrance door hinges will be lubricated if necessary and checked for spring tension closure. Unit door locks, knobs, strike plates, and stops will be checked for fastening, alignment, and workability. Defects will be corrected immediately. Door cylinders will be checked for proper key way and pinning to the unit master key. Cabinet hinges, friction catches, and pull handles will be inspected for proper closure, fastening, and alignment. Defects will be corrected immediately.
- 4) Tile Floors/Carpet - General condition of the floor will be noted on the form. When indentions, cracks, and bumps are found in the tile, the notation must include the color, size, and quantity of materials, and the room where tile replacement is necessary. Carpet will be inspected for cleanliness, wear and tear, and damages as noted on the inspection form.
- 5) Ceramic Tile - the general condition of floor tile will be noted on the form. When cracked, broken, or missing tile is found, the notation must include the color, quantity, and size of material needed for the repair.
- 6) Electrical - switches will be operated to check their workability. Defective switches and outlets and missing or badly cracked cover plates will be replaced. Loose fixtures will be tightened. Fuse cut-out boxes will be inspected for conformity to fusestats and adapters. Any deviation from these fusestats will be corrected immediately. If there are indications of tampering with fuse boxes, a notation will be made on the form and a report made to the Maintenance Staff. Light fixture will be checked for cleanliness and damage and working bulbs.
- 7) Plumbing Fixtures - plumbing fixtures will be inspected for fastenings, workability, operation, water tightness and flow to and from the fixtures. Leaks to and from fixtures, including tubing, valves, bonnets, packing and piping, will be repaired immediately. Combination sinks, drain boards, bathtubs, and sink

will be inspected for damage, wear, or chipped areas. The extent of damage will be recorded on the Inspection Form for disposition by the Maintenance Staff. Flush tanks, flush tank covers, and toilet bowls will be inspected for cracks and chips and for cleanliness and stains. If repair is needed, a notation will be made on the Inspection Form and reported to the Maintenance Staff.

- 8) Refrigerators will be checked for secure door closures, door seals, thermostat operation, freezing capability, general condition and cleanliness. If the refrigerator is found to be in poor condition or dirty because of lack of care or abuse, the problem will be noted on the Inspection Form.
- 9) Windows will be checked for broken, cracked, or loose panes, proper operation of window locks, proper operation of the window opening and closure, weatherization (caulking, etc.), and for cleanliness.
- 10) Blinds/shades will be checked for condition and cleanliness of blades and tapes, bent or broken blades and proper operation of blind. Shades will be checked for proper operation of shade and condition and cleanliness. All repairs and conditions will be noted on the Inspection Form and reported to the Maintenance Staff.
- 11) General Unit Condition - The general condition of the entire unit will be noted. The following items will be checked and a notation entered on the Inspection Form.
  - a) Is unit unsanitary, unclean, or unsafe? If so, give details.
  - b) Are there other damages, such as sheet rock or wood frames; (walls, ceilings, interior or exterior doors)
  - c) Check washing machines for fixed connections to water supply and drainage.
  - d) Serial and tag number of range and refrigerator will be recorded for use in the annual inventory



- f. A completed Inspection Form will be submitted to the Management Staff who is responsible for initiating the work orders arising from the inspection. These work orders will be categorized as Unit Inspection and their issuance noted on the Inspection Form.

## **2. Building and Systems Maintenance**

- a. **Buildings** - The Inspectors will inspect each building and all facilities at least monthly. The inspection will include:
  - 1) The complete building envelope, consisting of roofs, overhangs, exterior walls, windows, screens, doors, railing, and infestation
  - 2) All grounds, playground equipment, picnic tables, public or private streets or driveways roads, walks, and the drainage system and lawns (checking for foundation problems or leaks of gas or water).
  - 3) Particular attention will be given to evidence of sewer problems, water leaks, gas leaks, and the electrical drops, and gas meter installations.
  - 4) The Maintenance Staff will report the conditions found and indicate the exact location of needed repairs or replacements.
- b. **HVAC Systems** - Regular inspections will be made of HVAC systems whether by Housing Authority personnel or contractors.
- c. **Equipment** - Whenever a new piece of equipment is purchased, a file is started including all recommended preventive Maintenance servicing dates. This information is recorded for scheduling. A copy of the work order, which confirms the performance of scheduled Maintenance, or the repair, or replacement of any parts, is placed in the file to establish a record of all work performed on the equipment or system.
- d. **General Procedure** - Work to be accomplished quarterly is confirmed by work orders produced on the first of March, June, September, and December.

### 3. Motor Vehicles

#### a. Scheduled Maintenance

Specified tasks will be performed as required on a daily, weekly, or monthly basis:

**Daily-** odometer check, visual check

**Weekly-** (Monday morning before work begins)

Check all fluids; check inside and outside of vehicle

**Bi-Monthly-** Tune-up and oil change as needed  
(Maximum is 3,000 miles)

**Annually** – Motor vehicle Inspection and Registration

#### b. The Maintenance Staff is responsible for the condition of the vehicle and assuring that scheduled Maintenance is performed. This includes the completion of oil changes, lubrication, tune-ups, or other repairs and Maintenance. If the work required is beyond the capacity of Staff, outside services will be secured.

### 4. Painting

#### a. Exteriors

- 1) The scheduling of exterior painting is the responsibility of the Maintenance Department and is programmed to accomplish the painting of approximately one-fifth (1/5) of the total inventory each year.
- 2) Included in the above inventory are all appendage facilities within each development. These include the Management/Maintenance building, recreation building, pump and meter structures, benches, and signs.
- 3) Painting will be accomplished between cycles if it becomes necessary due to fire damage, hail, graffiti, or other unavoidable circumstances.
- 4) Residents, unless employed to do so by the Housing Authority, are not to apply paint in any manner to building exteriors. Should they do so, they will be responsible for the restoration of the property as directed by the Housing Authority.

b. Interiors

- 1) The condition of the interior paint finish of each unit will be inspected when vacated and a unit will be re-painted as necessary prior to occupancy to bring it to a standard of good property Maintenance.
- 2) The interior of occupied units will be painted according to the cycle painting standard or as soon as feasible. Painting will be done at intervals no longer than every five (5) years for family units; every seven (7) years for elderly units.
- 3) Interior of Management/Maintenance facilities will be painted as necessary but at least every 5 years.

**LEAD BASE PAINT HAZARDS**

The Housing Authority of the City of Charlottesville shall abide by all requirements as outlined in 24CFR Part 35 "Requirement for notification, evaluation and reduction of lead based paint hazards in federally owned residential property and housing receiving Federal assistance."

The Housing Authority of the City of Charlottesville performed testing and abatement under interim guide lines as prescribed in 1988. Testing was conducted on all Conventional Public Housing Units constructed prior to 1978 at that time. All lead identified as result of the tests performed were 100% abated

All records of testing are maintained at the central offices by the Real Estate Investment and Development Department (REID)

The Housing Authority of the City of Charlottesville will ensure that any need for testing will be contracted and accomplished by certified lead base inspector.

**Service Contracts**

The Housing Authority of the City of Charlottesville has Contracted with outside firms to provide Boiler/

Chiller; Elevator, Garbage removal,  
Gas System Tests, Extermination Service,  
Landscaping Services, Generator Inspection  
and Fire System Inspection maintenance work.

Each of these contracts was procured in accordance  
with CRHA Procurement policies based upon HUD  
Regulation as 24 CFR 85.36.

All contract were selected by bid or complete  
proposal method and the total amount of the  
contracts are well within CRHA's operating budget for  
the year.

These contract are administered by the Director of  
Finance or his/ her designee and shall be reviewed,  
at least annually, for performance and cost  
effectiveness.

#### **I. Maintenance Staff Training**

It is the intention of the Housing Authority's Maintenance Department to have a qualified, well-trained work force. Its goal is to ensure that every member of the department is thoroughly trained in his/her job skill in order to perform his/her mission in a timely and efficient manner.

CRHA A.C.T.S. –Community crime prevention strategies/programs aimed at reducing crime and increasing safety in CRHA communities through **Advocacy**, **Capital** improvements and physical design, **Tenant** education, engagement and enforcement and **Services**

## **Advocacy**

### *Short Term (6-12 months)*

1. Presentation to Legal Aid, residents, community partners and agencies to support established safety enhancement strategies.
2. Annually review/seek additional funding within CRHA's operating budget for anticrime activities, to include the costs of providing adequate security for public housing residents.
3. Research the effectiveness of a Loitering Policy.

### *Ongoing*

1. Develop/seek partnership opportunities that support safety enhancements and initiatives in CRHA's communities and surrounding neighborhoods.
2. Partner and build relationships with local media outlets and use social media to highlight successes and positive community news.

## **Capital/Physical Improvements**

### *Short Term (6-12 months)*

1. Update/Install "Trespassing" signs throughout CRHA communities to improve enforcement of the barment policy.
2. Conduct complete security assessment of all CRHA properties and units to determine "hot spots" and to explore strategies and funding to implement Crime Prevention through Environmental Design (CPTED).
3. Replace dead light bulbs throughout CRHA communities. Complete lighting study at all of the CRHA communities
4. Establish procedure for issuance and deactivation of access fobs within all CRHA senior communities. CRHA will also reissue key fobs to all senior building residents to better control, monitor and limit access and repair or replace telecom system.
5. Partner with PHAR, LAJC and resident to develop a Camera Policy that identifies how the cameras will be utilized, the placement of video cameras and how footage can be accessed and disbursed.

#### *Long Term (12 – 24 months)*

1. Implement improved lighting projects at CRHA communities identified as not having adequate lighting for increased visibility. Develop prioritization schedule based on crime statistics and outcomes for installation in remaining communities.
2. Coordinate CRHA lighting improvements with planned City of Charlottesville lighting projects to maximize efficiency. This crime prevention strategy aims to improve the lighting on streets to reduce crime through modifying and improving environmental measures.
3. Install public surveillance systems (CCTV) to include a network of cameras, and other components for monitoring, recording, and transmitting video images throughout CRHA's communities with the ultimate goal of reducing both property and personal crimes.
4. Develop CPTED plan to aid in capital fund grant allocation and five-year planning around the four strategies of natural surveillance, territorial reinforcement, natural access control and target hardening.

#### *Ongoing*

1. Conduct monthly lighting surveys in each AMP to identify and repair damaged/missing lighting that prevents lights from serving their intended purpose and remove any obstructions that reduce visibility.
2. Continue to seek additional funding for physical improvements through grants such as HUD's Emergency Safety and Security grant, the Byrne Criminal Justice grant, Project Safe Neighborhoods, etc. to support capital/physical improvements.
3. Annually target capital fund allocations and redevelopment activities aimed at changes in community infrastructure, urban design and the physical environment in order to reduce crime.

#### **Tenant Engagement, Education and Enforcement**

##### *Short Term (6-12 months)*

1. Develop and conduct crime reduction survey aimed at determining the drivers and nature of crime in each community for use in developing targeted approaches to address.
2. Institute monthly "senior checks" by resident councils, resident services staff and/or community partners to discourage elder abuse.
3. Implement car registration/decal program in all CRHA communities to help management and law enforcement to know which cars rightfully belong on the property and allow for the removal of improper/suspicious vehicles.

##### *Long Term (12 – 24 months)*

1. Work with resident councils to establish block watch, apartment watch, home watch, and community watch programs that involve residents in trying to prevent crime in their neighborhood or community. Encourage residents to remain alert for suspicious activities and report those activities to the police.
2. Develop a resident/ community mediator program to help resolve issues between neighbors in the community.
3. Educate residents on the CRHA firearm policy.
4. Reinstate annual criminal background checks at annual reexamination for all CRHA residents aged 18 and older.
5. Develop tracking system in Yardi to denote evictions/lease terminations related to enforcement activities to establish metrics and measure outcomes.
6. Explore developing a CRHA crime hotline and monitoring as avenue for residents to provide anonymous tip information.

### *Ongoing*

1. Continue to support and engage the PHAR in communicating issues within the communities and playing an integral part in developing strategies and services to address these issues.
2. Continuously seek opportunities to engage/partner residents, community and faith-based organizations, and local government agencies in addressing the factors that contribute to the community's crime, delinquency, and disorder.
3. Routinely provide crime prevention literature through rent statements, community events, email, etc. to inform residents of crime issues/statistics and prevention tips.
4. Aggressively pursue lease enforcement action against households identified in engaging in criminal, gun, drug and gang related activities through daily noteworthy reports or police notification.
5. Annually review CRHA ACOP, Admin Plan and Lease to revise applicant /resident screening criteria for use in screening potential and existing residents, policies and practices related to occupancy in CRHA's PH and HCVP programs.
6. Annually review/update CRHA barment policy and list.

### **Services**

#### *Short Term (6-12 months)*

1. Develop eviction prevention program through resident services to combat eviction, reduce trauma related to housing instability and reduce high costs of unit turnover.
2. Conduct "asset mapping" activity categorized across age groups and community to determine services and /or programs currently being provided in each CRHA community to address gaps, document resources, avoid duplication and coordinate efforts.

3. Partner with agencies and service providers to develop trauma/grief counseling protocol and services for use by impacted households within CRHA communities following criminal injury and/or fatalities.
4. Partner with CPS to establish school- or community-based programs targeting frequently absent/truant students or students at risk of dropping out of school. Programs that are aimed at increasing school engagement, school attachment, and the academic performance of students and reducing school/community violence, property damage, truancy and delinquency.

Long-Term (12 – 24 months)

1. Work with CPD to develop positive interaction opportunities for youth aged 10 -24.
2. Implement gang and crime prevention programs utilizing community/local residents to impact youth through shared experiences related to gun violence, gangs, incarceration, etc.



D.

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning April 1, 2022, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Charlottesville Redevelopment & Housing Authority

PHA Name

VA016

PHA Number/HA Code

☒ Annual PHA Plan for Fiscal Year 2023- 2024

☐ 5-Year PHA Plan for Fiscal Years 20\_\_ - 20\_\_

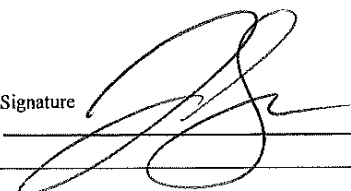
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C.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

Name of Executive Director

John M. Sales

Name Board Chairman Dr. A'Lelia Henry

Signature



Date

12/09/22

Signature



Date

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The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

E.

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Samuel Sanders, Jr., the Deputy City Manager for Operations  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years \_\_\_\_\_ and/or Annual PHA Plan for fiscal  
year 2023- 2024 of the Charlottesville Redevelopment & Housing Authority is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair  
Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Charlottesville  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or  
State Consolidated Plan.

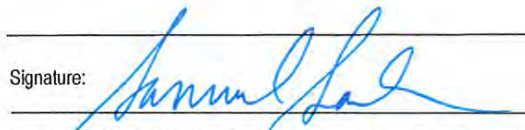
The Charlottesville Redevelopment & Housing Authority staff have stayed involved in the  
Consolidated Plan process to insure consistency with the Area Consolidated Plan.

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

Name of Authorized Official: Samuel Sanders Jr.

Title: Deputy City Manager for Operations

Signature:



Date:

11/8/22

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S.  
Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information  
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instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.  
HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

# F. Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Charlottesville Redevelopment &amp; Housing Authority

Program/Activity Receiving Federal Grant Funding

Public Housing- Capital Fund Grant

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Name of Authorized Official

John M. Sales

Title

Executive Director

Signature

Date (mm/dd/yyyy)

12/09/2022

Previous edition is obsolete

form HUD 50071 (01/14)

# CHARLOTTESVILLE REDEVELOPMENT & HOUSING AUTHORITY

P.O. BOX 1405

CHARLOTTESVILLE, VIRGINIA 22902

TELEPHONE/TTY/711: (434) 326-4748 FAX: (434) 971-4797

[www.charlottesville.org/housing](http://www.charlottesville.org/housing)



## **CRHA RESOLUTION #1445**

### **RESOLUTION APPROVING THE SUBMISSION OF CHARLOTTESVILLE REDEVELOPMENT AND HOUSING AUTHORITY'S PROPOSED ANNUAL PLAN FY 2023-2024**


**WHEREAS**, the Charlottesville Redevelopment and Housing Authority ("CRHA" or the "Authority"), after receiving public comments, has drafted a proposed Annual Plan for 2023-2024; and

**WHEREAS**, the CRHA is required to submit the proposed Annual Plan to the Richmond Field Office for the United States Department of Housing and Urban Development for review and approval of the proposed CRHA Annual Plan; and

**NOW THEREFORE, BE IT RESOLVED**, by the Board of Commissioners of the Charlottesville Redevelopment and Housing Authority hereby approve the submission of the proposed CRHA Annual Plan, as amended, and authorizes the CRHA Executive Director to forward the proposed Annual Plan to the Richmond Field Office for the United States Department of Housing and Urban Development for review and approval.

**RESOLVED THIS EIGHTH DAY OF DECEMBER 2022 BY THE CRHA BOARD OF COMMISSIONERS.**

  
Dr. A'Lelia R. Henry, CRHA Board Chair

  
John M. Sales, CRHA Secretary



CRHA does not discriminate on the basis of race, color, sex, age, religion, national origin, disability, veteran status, or union affiliations in any of its federally assisted programs and activities.

