| <b>PHA</b> | 5-Year   | and |
|------------|----------|-----|
| Annı       | ıal Plan |     |

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

OMB No. 2577-0226 Expires 4/30/2011

| 1.0 | PHA Information   |                 |                                      |                               |                   |             |
|-----|---|-----------------|--------------------------------------|-------------------------------|-------------------|-------------|
|     | PHA Name: The Housing Authority of the City of Charleston PHA Code: SC001 |                 |                                      |                               |                   |             |
|     | PHA Type: Small High Performing Standard HCV (Section 8)                  |                 |                                      |                               |                   |             |
|     | PHA Fiscal Year Beginning: (MM/YYYY): 10/2010                             |                 |                                      |                               |                   |             |
|     |   | ,               |                                      |                               |                   |             |
| 2.0 | <b>Inventory</b> (based on ACC units at time of                           | FY beginning    | g in 1.0 above)                      |                               |                   |             |
|     | Number of PH units: <b>1399</b>   |                 | umber of HCV units: 1279             |                               |                   |             |
|     | ramoor of 111 ams.  | 111             | anicer of the values. 2275           |                               |                   |             |
| 3.0 | Submission Type   |                 |                                      |                               |                   |             |
|     |   | Annua Annua     | l Plan Only                          | 5-Year Plan Only              |                   |             |
|     |   |                 | <u> </u>                             | ·                             |                   |             |
| 4.0 | PHA Consortia   | PHA Consort     | tia: (Check box if submitting a join | int Plan and complete table b | elow.)            |             |
|     |   | 1               |                                      | 1                             | No. of Uni        | to in Early |
|     | D C C DILA  | PHA             | Program(s) Included in the           | Programs Not in the           | Program           | its in Each |
|     | Participating PHAs  | Code            | Consortia                            | Consortia                     |                   | HCV         |
|     | 777.1   |                 |                                      |                               | PH                | HCV         |
|     | PHA 1:  |                 |                                      |                               |                   |             |
|     | PHA 2:<br>PHA 3:  |                 |                                      |                               |                   |             |
| 5.0 |   | mly at 5 Vac    | n Dlan undata                        |                               |                   |             |
| 5.0 | <b>5-Year Plan.</b> Complete items 5.1 and 5.2 c                          | only at 5- real | r Pian update.                       |                               |                   |             |
| 5.1 | <b>Mission.</b> State the PHA's Mission for serv                          | ing the needs   | s of low-income very low-income      | and extremely low income      | families in the I | PHA's       |
|     | jurisdiction for the next five years:                                     | ing the needs   | of low mediae, very low media        | e, and extremely low meetine  | ramines in the r  | 1111 5      |
|     | Januaren 101 ane nene 1170 yearsi   |                 |                                      |                               |                   |             |
|     | To promote adequate and affordable hous                                   | sing, economi   | c opportunity and suitable living    | environment free from discr   | imination.        |             |
|     |   | O,              |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     | Goals and Objectives. Identify the PHA's                                  | s quantifiable  | goals and objectives that will ena   | able the PHA to serve the nee | eds of low-incon  | ne and very |
| 5.2 | low-income, and extremely low-income far                                  | milies for the  | next five years. Include a report    | on the progress the PHA has   | made in meetin    | g the goals |
|     | and objectives described in the previous 5-                               | Year Plan.      |                                      | 1 0                           |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   | <b>HOUSING</b>  | <b>AUTHORITY OF THE CITY OF</b>      | CHARLESTON                    |                   |             |
|     |   |                 | FIVE YEAR AGENCY GOALS               |                               |                   |             |
|     |   |                 | 2010 – 2015                          |                               |                   |             |
|     | 2010 - 2013   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     | GOAL: PROVIDE GOOD QUALITY HOUSIN   | G SERVICES D    | DAILY TO CLIENTS                     |                               |                   |             |
|     | Objectives:   |                 |                                      |                               |                   |             |
|     | Score of 90+ on PHAS  |                 |                                      |                               |                   |             |
|     | <ul> <li>Score of 8+ on Resident 9</li> </ul>                             | Survey.         |                                      |                               |                   |             |
|     | Score of 90+ on SEMAP.  |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     | GOAL: MAINTAIN A HIGH LEVEL OF PROF                                       | ESSIONALISM     | A AMONG STAFF MEMBERS                |                               |                   |             |
|     | Objectives:   |                 |                                      |                               |                   |             |
|     | > Increase training opportunities for staff.                              |                 |                                      |                               |                   |             |
|     | Challenge performance and reward excellence.                              |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     | COAL, INCREASE THE RESOURCES OF ASS                                       | ODDADIE         | NUCINIC IN THE CITY OF CHAPTER       | TON                           |                   |             |
|     | GOAL: INCREASE THE RESOURCES OF AFF                                       | OKDABLE HC      | JUSTING IN THE CITY OF CHARLES       | IUN                           |                   |             |
|     | Objectives:   |                 |                                      |                               |                   |             |
|     | Create additional homes for citizens on low to moderate incomes.          |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |
|     |   |                 |                                      |                               |                   |             |

# HOUSING AUTHORITY OF THE CITY OF CHARLESTON FIVE YEAR AGENCY GOALS 2010 – 2015 (Continued)

# GOAL: CREATE A PERSONAL IMAGE OF WHO WE SERVE AND THEIR DREAMS AND ASPIRATIONS Objectives:

Continue to supply media outlets successes of residents for media attention, as well as CHA accomplishments.

# GOAL: PROMOTE INVOLVEMENT OF CLIENTS IN DECISIONS AFFECTING THEM Objectives:

- > Support resident associations and the Resident Advisory Board.
- > Strengthen communication with clients.

# GOAL: PROVIDE IMPROVED LIVING CONDITIONS FOR VERY LOW AND LOW INCOME FAMILIES WHILE MAINTAINING THEIR RENT PAYMENTS AT AN AFFORDABLE LEVEL

## **Objectives:**

- > To operate a socially and financially sound public housing agency that provides decent, safe, and sanitary housing within a drug free, suitable living environment for tenants and their families
- > To lawfully deny the admission of applicants, or the continued occupancy of residents, whose habits and practices reasonably may be expected to adversely affect the health, safety, comfort or welfare of other residents or the physical environment of the neighborhood, or create a danger to PHA employees.

# GOAL: AVOID CONCENTRATIONS OF ECONOMICALLY AND SOCIALLY DEPRIVED FAMILIES IN ANY ONE OR ALL OF THE PHA'S PUBLIC HOUSING DEVELOPMENTS

## **Objectives:**

- > To attempt to house a tenant body in each development that is composed of families with a broad range of incomes and rent-paying abilities that are representative of the range of incomes of low-income families in the PHA's jurisdiction.
- To provide opportunities for upward mobility for families who desire to achieve self-sufficiency.
- > To facilitate the jurisdiction management of the PHA inventory, and the efficient management of the PHA staff.
- > To ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations so that the admissions and continued occupancy are conducted without regard to race, color, religion, creed, sex, national origin, handicap or familial status.

# 6.0 PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

Since the CHA's last Annual Plan submission, the following elements have been revised or updated:

# **ELEMENT 1: ELIGIBILITY, SELECTION AND ADMISSIONS POLICIES**

A. The Admissions and Continued Occupancy Policy (ACOP) was amended to include HUD guidance on the use of Up Front Income Verification to project income was adopted by the Board of Commissioners on 9/29/09.

# **ELEMENT 2: FINANCIAL RESOURCES**

| Financial Resources:  |            |                           |  |  |  |
|---|------------|---------------------------|--|--|--|
| Planned Sources and Uses  |            |                           |  |  |  |
| Sources   | Planned \$ | Planned Uses              |  |  |  |
| 1. Federal Grants (FY 2009 grants)                                |            |                           |  |  |  |
| a. Public Housing Operating Fund                                  | 5,772,000  |                           |  |  |  |
| b. Public Housing Capital Fund                                    | 2,469,464  |                           |  |  |  |
| c. Hope VI Revitalization   |            |                           |  |  |  |
| d. Hope VI Demolition   |            |                           |  |  |  |
| e. Annual Contributions for Section 8 Tenant-<br>Based Assistance | 7,744,875  |                           |  |  |  |
| f. Resident Opportunity and Self-Sufficiency<br>Grants            |            |                           |  |  |  |
| g. Community Development Block Grant                              |            |                           |  |  |  |
| h. HOME   |            |                           |  |  |  |
| Other Federal Grants:   |            |                           |  |  |  |
| Capital Fund Recovery Act Competitive<br>Grants                   | 3,341,504  |                           |  |  |  |
| Capital Fund Recovery Act Grant                                   | 3,071,883  |                           |  |  |  |
| 2. Prior Year Federal Grants (un-obligated funds only)            |            |                           |  |  |  |
| 3. Public Housing Dwelling Rental Income                          | 1,916,000  | Public Housing Operations |  |  |  |
| 4. Other Income (list below)                                      |            |                           |  |  |  |
| a. Other Tenant Revenue   | 160,000    | Public Housing Operations |  |  |  |
| b. Interest   | 20,401     | Public Housing Operations |  |  |  |
| 5. Non-Federal Sources  |            |                           |  |  |  |
|   |            |                           |  |  |  |
| TOTAL RESOURCES   | 24,469,127 |                           |  |  |  |

# **ELEMENT 3: RENT DETERMINATION**

There were no policy updates / changes.

## **ELEMENT 4: OPERATION AND MANAGEMENT**

- A. The Housing Choice Voucher Administrative Plan was amended to include new voucher payment standards and adopted by the Board of Commissioners on 09/28/2009.
- B. The Admissions and Continued Occupancy Policy (ACOP) was amended to include updates of utility allowances for public housing and was adopted by the Board of Commissioners on 09/28/2009.
- C. The Housing Choice Voucher Administrative Plan was amended to include updates to utility allowances and was adopted by the Board of Commissioners on 11/24/2009.
- D. The Housing Choice Voucher Administrative Plan was amended to include updated payment standards and adopted by the Board of Commissioners on 11/24/2009.

- E. Revisions were made to the CHA's Procurement Policy to include raising the requirement for posting bids, as well as the inclusion of official HUD forms in all PHA contracts. These revisions were adopted by the Board of Commissioners on 03/23/2010.
- F. The Admissions and Continued Occupancy Policy (ACOP) was amended to add or change references to coincide with the Code of Federal Regulations and was adopted by the Board of Commissioners on 03/23/2010.
- G. The Board of Commissioners approved Contractor's Notice and Certification against Sex Offenders/Violent/Drug-Related Felons on 05/25/2010.

# **ELEMENT 5:** GRIEVANCE PROCEDURES

A. The appointment of new Informal/Grievance Hearing Officers was approved by the Board of Commissioners on 02/23/2010.

#### **ELEMENT 6: DESIGNATED HOUSING FOR ELDERLY AND DISABLED FAMILIES**

A. Policy changes to the HCV Administrative to allow preference to Elderly and Handicapped families to be assisted first was approved by the Board of Commissioners on 02/23/2010.

#### **ELEMENT 7: COMMUNITY SERVICE AND SELF-SUFFICIENCY**

There were no policy updates / changes.

#### **ELEMENT 8: SAFEFY AND CRIME PREVENTION**

A. The Board of Commissioners approved a Memorandum of Understanding with Charleston Police Department to increase resources at various AMP's on 02/23/2010.

#### **ELEMENT 9: PETS**

There were no policy updates / changes.

## **ELEMENT 10: CIVIL RIGHTS CERTIFICATION**

New form included with this submission.

6.0

# **ELEMENT 11: FISCAL AUDIT**

- 1. ✓ Yes □ No: Is the PHA required to an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
- 2. ✓ Yes □ No: Was the most recent fiscal audit submitted to HUD?
  - ☐ Yes ✓ No: Were there any findings as the result of that audit?

#### **ELEMENT 12: ASSET MANAGEMENT**

There were no policy updates / changes.

# **ELEMENT 13: VIOLENCE AGAINST WOMEN ACT (VAWA)**

- A. The Admissions and Continued Occupancy Policy (ACOP) was amended to include HUD guidance and input received from National Housing Law on VAWA policies, Notice PIH 2006-13 was adopted by the Board of Commissioners on 09/29/2009.
- (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

PHA Administrative Office located at 550 Meeting Street,

AMP 20 located at 562(A) Meeting Street, Charleston SC

AMP 30 located at 20 Franklin Street, Charleston SC

AMP 40 located at 183 President Street, Charleston, SC

Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable.

| 8.0 | Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.   |
|-----|---|
| 8.1 | Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1, for each current and open CFP grant and CFFP financing.   |
| 8.2 | Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the Capital Fund Program Five-Year Action Plan, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. |
| 8.3 | Capital Fund Financing Program (CFFP).  Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.   |

**Housing Needs**. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

Based on the City of Charleston's Consolidated Plan, the primary housing issue which requires ongoing attention is that which pertains to affordability. By all accounts, average income levels have not kept pace with appreciated housing costs. As per HUD, as one would surmise, those earning less than 30% of the area median income are most affected. Along with income and housing costs, there are four additional factors which play a part in the inability of some to secure adequate housing. First, there is the lack of basic availability. Second, on those occasions when units are in fact available to those of limited incomes, the physical condition of those units may be a factor. Third, there is the location of the unit. Finally, the size (number of bedrooms) could potentially be a factor.

If a unit which lends its self as being a viable leasing option (i.e., contract rent vs. income) is in anything other than decent and sanitary condition, it can no longer realistically align itself with other units said to be "available". Additionally, circumstances sometimes exist whereby available units are said to be in acceptable condition, but are not located in areas which are safe or which are conducive to personal factors pertaining to specific individuals (i.e., close to doctor, child's school, bus route, etc.) While a landlord's construction of a two-bedroom rental unit affords him or her the most potential for finding a family the size of which said unit would be sufficient in size, there are going to be those instances when a three, four, or even five bedroom unit is needed. All of this having been said, while a unit may be available in the sense that the rent is low enough for it to be leased by someone with limited means, it may not always meet all of the criteria of being truly "available" to an across-the-board segment of the population.

The continued need for housing opportunities is exhibited by the approximately 1,800 individuals who currently reside on the CHA public housing and HCV waiting lists. Said waiting lists are routinely purged annually in order to remove those who are no longer in need of housing assistance. Doing so increases the opportunity, and lessens the wait time, for those who continue to be in need of some type of housing assistance.

As an alternative to rental assistance through our public housing and HCV Programs, emphasis is also being placed on assisting individuals to hopefully become completely self-reliant, this through the help of our Family Self-Sufficiency Program. Furthermore, our Agency's Homeownership Program, with counseling provided to its participants by the Charleston Urban League, and has been successful in helping a number of individuals to experience the American dream of owning their own home.

| Housing Needs of Families on the PHA's Waiting Lists |                |                     |                 |  |  |
|--|----------------|---------------------|-----------------|--|--|
| Waiting list type: (select one)                      |                |                     |                 |  |  |
| Section 8 tenant-based assistance                    |                |                     |                 |  |  |
| ☑ Public Housing                                     | Public Housing |                     |                 |  |  |
| ☐ Combined Section 8 and Public F.                   | Iousing        |                     |                 |  |  |
| ☐ Public Housing Site-Based or sub                   |                |                     |                 |  |  |
| If used, identify which develop                      |                |                     |                 |  |  |
|  | # of families  | % of total families | Annual Turnover |  |  |
| Waiting list total                                   | 1358           |                     | 350             |  |  |
| Extremely low income <=30% AMI                       | 1276           | 94%                 |                 |  |  |
| Very low income                                      | 75             | .6%                 |                 |  |  |
| (>30% but <=50% AMI)                                 |                |                     |                 |  |  |
| Low income   | 07             | .1%                 |                 |  |  |
| (>50% but <80% AMI)                                  |                |                     |                 |  |  |
| Families with children                               | 836            | 61.56%              |                 |  |  |
| Elderly families                                     | 24             | 1.77%               |                 |  |  |
| Families with Disabilities                           | 141            | 10.38%              |                 |  |  |
| Race/ethnicity - Black                               | 1260           | 92.78%              |                 |  |  |
| Race/ethnicity - White                               | 69             | 5.08%               |                 |  |  |
| Race/ethnicity - Nat/Haw/Pac Islander                | 12             | .88%                |                 |  |  |
| Race/ethnicity - Asian                               | 03             | .22%                |                 |  |  |
|  |                |                     |                 |  |  |
| Characteristics by Bedroom Size                      |                |                     |                 |  |  |
| (Public Housing Only)                                |                |                     |                 |  |  |
| 0 BR   | 31             | .03%                | 10              |  |  |
| 1BR  | 421            | .31%                | 79              |  |  |
| 2 BR   | 559            | .42%                | 155             |  |  |
| 3 BR   | 284            | .21%                | 81              |  |  |
| 4 BR   | 60             | .05%                | 23              |  |  |
| 5 BR   | 03             | .01%                | 02              |  |  |

Wait List is closed.

9.0

| Housing Needs of Families on the PHA's Waiting Lists                    |               |                     |                 |
|---|---------------|---------------------|-----------------|
| 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) |               |                     |                 |
| If used, identify which development/sub-jurisdiction:                   |               |                     |                 |
|   | # of families | % of total families | Annual Turnover |
| Waiting list total  | 444           |                     | 104             |

|                                 | # of families | % of total families | Annual Turnover |
|---------------------------------|---------------|---------------------|-----------------|
| Waiting list total              | 444           |                     | 104             |
| Extremely low income <=30% AMI  | 341           | 77                  |                 |
| Very low income                 | 91            | 20                  |                 |
| (>30% but <=50% AMI)            |               |                     |                 |
| Low income                      | 11            | 2                   |                 |
| (>50% but <80% AMI)             |               |                     |                 |
| Families with children          | 324           | 73.33               |                 |
| Elderly families                | 6             | 1.40                |                 |
| Families with Disabilities      | 22            | 4.95                |                 |
| Race/ethnicity – Asian          | 10            | 2.25                |                 |
| Race/ethnicity - Black          | 417           | 93.92               |                 |
| Race/ethnicity – Nat/Haw/Pac    | 6             | 1.35                |                 |
| Islander                        |               |                     |                 |
| Race/ethnicity white            | 11            | 2.48                |                 |
| Characteristics by Bedroom Size |               |                     |                 |
| (Public Housing Only)           |               |                     |                 |
| 0 BR                            |               |                     |                 |
| 1BR                             |               |                     |                 |
| 2 BR                            |               |                     |                 |
| 3 BR                            |               |                     |                 |
| 4 BR                            |               |                     |                 |
| 5 BR                            |               |                     |                 |

Wait List is Closed.

Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

The Housing Authority of the City of Charleston has identified the following strategies for addressing the housing needs of families within Charleston County:

A. Need: Shortage of affordable housing for all eligible populations.

Strategy 1: Maximize the number of affordable units available to the PHA within its current resources by:

- a) Employing effective maintenance and management policies to minimize the number of public housing units off-line.
- b) Reduce turnover time for vacated public housing units.
- c) Seek replacement of public housing units lost to the inventory through mixed finance development.
- d) Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.
- B. Need: Specific Family Types: Families at or below 30% of median.

Strategy 1: Target available assistance to families at or below 30% of AMI by:

- a) Adopt rent policies to support and encourage work.
- C. Need: Specific Family Types: Families at or below 50% of median.

Strategy 1: Target available assistance to families at or below 50% of AMI by:

- a) Employ admissions preferences aimed at families who are working.
- b) Adopt rent policies to support and encourage work.
- D. Need: Specific Family Types: Families with Disabilities.

Strategy 1: <u>Target available assistance to Families with Disabilities by:</u>

- a) Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing.
- b) Affirmatively market to local non-profit agencies that assist families with disabilities.

Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

The Housing Authority of the City of Charleston made progress in the following areas in meeting the goals set forth in the 2005 – 2009 Five Year Plan

GOAL: PROVIDE IMPROVED LIVING CONDITIONS FOR VERY LOW AND LOW INCOME FAMILIES WHILE MAINTAINING THEIR RENT PAYMENTS AT AN AFFORDABLE LEVEL

#### Objective:

To operate a socially and financially sound public housing agency that provides decent, safe, and sanitary housing within a drug free, suitable living environment for tenants and their families.

#### **Progress**

Since its last 5 year plan submission, The Housing Authority of the City of Charleston has been awarded \$17,896,915.00 in the form of annual Capital Fund grant awards (\$11,483,528.00) and American Recovery and Reinvestment Act of 2009 grants awards (\$6,413,387.00). In our ongoing quest to provide decent, safe, and sanitary housing the CHA conducts physical needs assessments of its public housing stock to assess the condition of, and identify areas that require upgrading or improvement. A large portion of these funds were utilized to extend and upgrade public housing units through internal and external renovations, site improvements, general up keep, and maintenance. In our continuous efforts to create, promote and maintain the safety of residents, the CHA has appointed a Director of Community Security who assesses the impact of criminal activity and identifies measures and strategies to be taken to eliminate these activities to ensure the safety of our residents. To further support our efforts, the CHA maintains a collaborative relationship with the City of Charleston Police Department and has increased the number of police officers assigned to each AMP.

#### Objective:

To lawfully deny the admission of applicants, or the continued occupancy of residents, whose habits and practices reasonably may be expected to adversely affect the health, safety, comfort or welfare of other residents or the physical environment of the neighborhood, or create a danger to PHA employees.

#### **Progress:**

The CHA Housing Choice Voucher Administrative Plan, as well as its public housing Admissions and Continued Occupancy Policy (ACOP), fully address those issues pertaining to tenant habits and practices which if left unattended, could very well result in scenarios which could not only "adversely affect the health, safety, comfort or welfare of other residents", but could also tarnish the reputation of these valuable housing programs in the eyes of the general public. While those found to be in violation of established policies are afforded due process as outlined by federal regulation, they are nevertheless addressed expediently and in full-force. As a result of the actions of two previous residents who were not content with having their assistance terminated as a result of activities contrary to established policy, FH&EO complaints lodged by both of them against CHA have been dismissed. A third currently remains open.

As part of our overall plan to assist in keeping our assisted communities safe, CHA has chosen to employ a Director of Security. As part of his responsibilities, background checks are always performed on all adult household members prior to leasing a unit to a family from the waiting list. Additional checks are also performed during the term of the rental agreement should information be made available which indicates circumstances as having occurred which may require the termination of their housing assistance.

GOAL: AVOID CONCENTRATIONS OF ECONOMICALLY AND SOCIALLY DEPRIVED FAMILIES IN ANY ONE OR ALL OF THE PHA'S PUBLIC HOUSING DEVELOPMENTS

#### Objective:

To attempt to house a tenant body in each development that is composed of families with a broad range of Income and rent-paying abilities that are representative of the range of incomes of low-income families in the PHA's jurisdiction.

#### **Progress:**

CHA's ACOP does not allow for the award of any unit in its public housing inventory based on an applicant's household income. Instead, units are offered based strictly on the date and time of their application. Each individual whose name reaches the top of the waiting list is offered a maximum of three (3) different units from which to choose. The offers are made in conjunction with those that are vacant / available at that time and that are of the size (i.e., number of bedrooms) needed by that particular applicant (as per the established ACOP occupancy standards).

#### Objective:

To provide opportunities for upward mobility for families who desire to achieve self-sufficiency.

#### <u>Progress</u>

While funding for the Family Self Sufficiency Program for Public Housing has been discontinued, the CHA continues to be committed to providing support services to active Family Self Sufficiency participants. Site based Program Specialists track the progress of and provide support services to eight active participants. They also maintain relationships with community resources to provide services such as GED, computer literacy, and credit counseling classes. The CHA's HCV Family Self-Sufficiency Program places emphasis on assisting individuals to become completely self-reliant. Furthermore, our Agency's Homeownership Program, with counseling provided to its participants by the Charleston Urban League, Charleston Bank Consortium, and Charleston Area Community Development Corporation has been successful in assisting nine participants become homeowners.

10.0

#### Objective:

To facilitate the jurisdiction management of the PHA inventory, and the efficient management of the PHA staff.

#### Progress:

The CHA operates its public housing program under Asset Management guidelines set forth by HUD and uses its resources in a manner consistent with Asset Management practices and strategies as outlined in published regulations.

#### Objective:

To ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations so that the admissions and continued occupancy are conducted without regard to race, color, religion, creed, sex, national origin, handicap or familial status.

#### **Progress**

11.0

The Housing Authority of the City fully complies with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. The City of Charleston Housing Authority also posts information regarding discrimination and any resources available to public housing applicants in their main administrative office.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification".

A substantial deviation from the Housing Authority's 5-year plan is defined as any change to the overall mission or to the goals or objectives as outlined in the Plan. A significant amendment or modification of the 5-year plan or Annual Plan includes a major deviation from any activity, proposed activity, or policy provided in the Agency Plan that would affect services or programs provided to residents. This deviation does not include changes to organizational structure, or minor policy changes.

The only substantial modification was to accommodate the American Recovery and Reinvestment Act of 2009.

**Required Submission for HUD Field Office Review**. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office.

- (a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations (which includes all certifications relating to Civil Rights)
- (b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)
- (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
- (d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only)
- (e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)
- (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- (g) Challenged Elements
- (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only)
- (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only)