



1917 Harden Street
Columbia, South Carolina 29204
803.254.3886 (o)

July 29, 2020

US Department of Housing & Urban Development
C/O: Eric Bickley, Director of Public Housing Program Center
SC State Office, Strom Thurmond Building
1835 Assembly Street
Columbia, SC 29201

Email Delivery: Eric.A.Bickley@hud.gov
Bernard.R.Dyal@hud.gov
RADPHAPPlans@hud.gov

Re: PHA 5-Year Plan (FY2020-2024) & Annual Plan Update (FY2019-2020)

Dear Mr. Bickley,

In accordance with *HUD's Temporary PHA Plan Submission Requirements*, please find the following documents for Columbia Housing attached for your review and approval:

- CH Cover Letter and PHA Plan Table of Contents
- HUD 50075 PHA Annual and 5-Year Plan
- Demolition and Disposition
- Mandatory or Voluntary Conversion
- Homeownership
- Project Based Vouchers
- Annual Capital Funds Statement
- Five Year Capital Improvements
- Housing Needs
- Strategy for Addressing Housing Needs
- **Exhibits**
- RAD Required Elements
- PH 5 Year Plan 2020-2024
- PH 5 Year Plan 2019-2020 Update
- RAB Comments
- Board Resolution Approval Plan and 5 Year Plan FY 2020-2024
- Public Hearing Q & A
- HUD 50077-sl City of Columbia
- HUD 50077-sl Richland County



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- HUD 50070
- HUD 50071
- HUD Form SFLLL
- HUD 50077-cr
- HUD 50077-st-hp-hcv
- **Supporting Documents**
- Admissions, Eligibility and Deconcentration Income Analysis
- Bedbug Addendum
- Community Service and Self-Sufficiency
- FSS Action Plan
- FYE 19 Audited Financials
- Maintenance Charges
- Operations and Maintenance Plan
- Operations and Management
- Rent Determination Policies
- Board Resolution Approval of Public Housing Admissions and Continued Occupancy Policy
- Board Resolution Approval of Housing Choice Voucher Administrative Plan
- Board Resolution Approval of FY June 2021 Operating Budgets

Each attached document and/or exhibit has been properly saved and labeled per instructions. If you have any questions or require additional information, please contact Yvonda Bean, Chief Operating Officer, at ybean@columbiahousingsc.org.

Sincerely,

A handwritten signature in blue ink that reads "Ivory N. Mathews".

Ivory N. Mathews
Executive Director/Chief Executive Officer

Attachments.



COLUMBIA HOUSING

1917 Harden Street

Columbia, SC 29201

803.254.3886

www.columbiahousingsc.org

5-YEAR PLAN

(Fiscal Years 2020 – 2024)

&

ANNUAL PLAN UPDATE

(Fiscal Year 2019 – 2020)

MISSION:

“Because Columbia Housing Cares, we are leveraging the power of housing to build a foundation for individuals to thrive.”

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: _____ Housing Authority of the City of Columbia, SC _____ PHA Code: _____ SC002 _____ PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): _____ 07/2020 _____												
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: _____ 1684 _____ Number of HCV units: _____ 4034 _____												
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only												
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)												
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program <table border="1"> <tr> <th>PH</th> <th>HCV</th> </tr> <tr> <td>PHA 1:</td> <td></td> </tr> <tr> <td>PHA 2:</td> <td></td> </tr> <tr> <td>PHA 3:</td> <td></td> </tr> </table>	PH	HCV	PHA 1:		PHA 2:		PHA 3:	
PH	HCV												
PHA 1:													
PHA 2:													
PHA 3:													
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.												
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: <i>Because CH cares, we are leveraging the power of housing to build a foundation for individuals to thrive.</i>												
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See <i>Exhibit B</i> for the 5 Year Plan 2020-2024 See <i>Exhibit C</i> for the 5 Year Plan for 2015-2020												
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: (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. Housing Needs, Capital Fund, Voluntary and Voluntary Conversion of Housing, Financial Statements, Strategy for Addressing Housing Needs, Operations and Maintenance, Management and Operations, Community Service and Self-Sufficiency, Eligibility and Submissions, and Rent Determination Copies of the Plan may be found at Columbia Housing's Main Office at 1917 Harden Street Columbia, SC 29204 and on our website at www.columbiahousingsc.org												
7.0	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. See attachments 2.0, 3.0, 4.0 and 5.0.												
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 <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing. See Attachment 6.0												
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , 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. See Attachment 7.0												
8.3	Capital Fund Financing Program (CFFP). <input type="checkbox"/> 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.												

9.0	<p>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.</p> <p>See Section 8.0 Narrative</p>
9.1	<p>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.</p> <p>See Section 9.0 Narrative</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(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.</p> <p>See Exhibit F for 2015-2020 5-Year Plan closeout</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p style="text-align: center;"><u>Significant Amendment Definition:</u></p> <p>As part of the Rental Assistance Demonstration (RAD), the Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:</p> <ul style="list-style-type: none"> ➤ Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds. ➤ Changes to the construction and/or rehabilitation plan for each approved RAD conversion; and ➤ Changes to the financing structure for each approved RAD conversion.
11.0	<p>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.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(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.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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.

Privacy Act Notice. 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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: **(i)** A description of the need for measures to ensure the safety of public housing residents; **(ii)** A description of any crime prevention activities conducted or to be conducted by the PHA; and **(iii)** A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (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; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a 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: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (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.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

Conversion of Public Housing

Subcomponent A: Mandatory Conversions

The Columbia Housing does not have any properties designated for mandatory conversions.

Subcomponent B: Voluntary Conversions

The Columbia Housing certifies that we have reviewed each covered development's operations as public housing, considered the implications of converting to tenant-based assistance and concluded that the conversion of the development may be appropriate because removal of the development would meet the necessary conditions for voluntary conversions.

When the Public Housing portfolio reaches less than 250 units, the remaining units will exist the program through voluntary conversion.

Under the RAD conversions, the unit count will remain the same pre-conversion and post-conversion, there will be no change in bedroom distribution and sizes and no transfer of assistance. The following chart details the planned public housing repositioning during the fiscal year.

The RAD Conversion Plan is included as an attachment under Exhibit A.

RAD CONVERSION	TOTAL UNITS	PROPERTY TYPE
Archie Drive	25	Family
Arsenal Hill	20	Family
Atlas Road	25	Family
Congaree Vista	25	Family
The Corners	24	Family
Elderly Cottages	10	Elderly
Fair Street	16	Family
Fontaine Place	25	Family
Greenfield	8	Family
Overbrook and Thornwell	6	Family
Pine Forest	28	Family
Pinewood Terrace	25	Family
Rosewood Hills	24	Family
Waverly Apartments	20	Family
Wheeler	16	Family
Arrington Manor (75/25)	58	Elderly
Rosewood (75/25)	40	Elderly
Hammond Village (75/25)	78	Family
UNITS PRECONVERSION	473	
UNITS POST CONVERSION	473	

Homeownership

The homeownership program offered by the Columbia Housing Authority (CHA) make available opportunities for persons to become homeowners through education, counseling and connecting with resources to assist with costs associated with home purchase. CHA provides prospective homeowners with education on financial literacy, home buying, and home maintenance. The program is designed to ensure that prospective home buyers are knowledgeable of the home buying process requirements for maintaining a home.

In 2020-2021, CHA will continue to help residents and others in the community become homeowners by providing education, counseling, and assistance with purchasing programs. Although CHA has a thriving home buying education program, the agency we are not a HUD Certified Housing Counseling Agency. One of the home ownership objectives for 2020 is for CHA to become a HUD Certified Housing Counseling Agency.

Subcomponent A: Public Housing

Currently, Columbia Housing does not provide direct opportunities for homeownership through public housing. As part of our conversion and development plan, we are proposing to convert some of the public housing single family homes to a homeownership option program. In addition to any opportunities offered through the public housing homeownership option, strategies have been put into place to assist public housing resident with purchasing homes through counseling, first time home buying education programs, and connecting them with various down payment assistance programs.

Subcomponent B: Housing Choice Voucher Capacity

The Housing Choice Voucher Program provides resources for Section 8 Housing Choice Voucher Program tenants to purchase a home with the use of their voucher. The CHA has been implementing the program for 19 years with a total of 109 Housing Choice Voucher families purchasing homes through the program. Two of the families who previously purchased through the program sold their first homes and purchased a second one with the use of HCV Homeownership subsidies in 2017. Families who purchased through the program are eligible to continue to receive housing support and case management services after purchase. As of February 2020, 18, 64 HCV homeowners continue to receive assistance through the voucher homeownership program. Ten new homeowners were created through the program in 2019. A copy of the Housing Choice Voucher Homeownership Plan is available for review in the Section 8 Administrative Plan.

Other homeownership opportunities are available through the homes purchased by the authority through the Richland County Neighborhood Stabilization Program and HUD Real Estate Owned Property Programs. Currently there are four moderately priced and very affordable homes available for sale. Most of the homes are located in the Northeast

Richland County area. For several years, the homes were rental properties for tenants who committed to purchasing them. To date, two of the homes are vacant and being prepared to be sold to eligible buyers.

CHA continues to provide home ownership education to first time home buyers. We have extended our services to other community partners to allow them to refer non-CHA low to moderate income families for home ownership training. In 2017, CH implemented an online registration for the homeownership classes. This process has made the program more organized and technologically accessible. The classes have attracted a host of professionals to volunteer their time to educate prospective home buyers. Our partners consist of attorneys, credit counselors, banks, realtors, and home inspectors. The volunteers commit their time to help CHA families learn about purchasing a home. In 2019, 411 individuals participated in home buying classes.

The following classes are part of the Home Ownership Program

- Home Buying Class
- Budget and Credit Class
- Home and Yard Maintenance Class

PROJECT BASED VOUCHERS

PROJECT BASED VOUCHERS RESIDENT RIGHTS AND PARTICIPATION

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

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

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

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

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

Three Year Phase-in:

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

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5: AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three-year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.

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

a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

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

All PHAs will be required to administer the FSS program in accordance with FSS regulations at

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

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

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

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

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

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

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

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

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

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

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but [are](#) not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

PBV: Other Miscellaneous Provisions

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

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

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

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

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to

determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants,

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

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the ~~newly-established waiting list~~ are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

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

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

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

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

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this and given the fact that PHAs will be receiving full public

housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Part 1: Summary				FFY of Grant: 2020	
PHA Name:		Grant Type and Number:			
The Housing Authority of the City of Columbia, SC		Capital Fund Program Grant No: SC16P002501-20 Replacement Housing Factor Grant No.			
		Date of CFFP:		FFY of Grant Approval: 2020	
Type of Grant:					
<input checked="" type="checkbox"/> Original Annual Statement		Reserve for Disasters		Revised Annual Statement/Revision Number:	
Performance and Evaluation Report for Period Ending:				Final Performance and Evaluation Report:	
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost 1	
		Original	Revised 2	Obligated	Expended
1	Total Non-CGP Funds				
2	1406 Operations (May not exceed 20% of Line 21) 3	\$1,000,000			
3	1408 Management Improvements	\$100,000			
4	1410 Administration (May not exceed 10% of line 21)	\$500,000			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1480 General Capital Fund	\$100,000			
15	1485 Demolition	\$300,000			
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18a	1499 Development Activities 4	\$3,000,000			
18ba	1501 Collateralization or Debt Service paid by the PHA				
19	9000 Collateralization or Debt Service paid Via System of Direct Payment				
20	1502 Contingency (may not exceed 20% of line 20)				
21	Amount of Annual Grant (Sum of lines 2-19)	\$5,000,000			
22	Amount of line 20 Related to LBP Activities				
23	Amount of line 20 Related to Section 504 Compliance				
24	Amount of line 20 Related to Security - Soft Costs				
25	Amount of line 20 Related to Security - Hard Costs				
26	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

- 1 To be completed for the Performance and Evaluation Report
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
- 3 PHA's with under 250 units in management may use 100% of CFP Grants for operations
- 4 RHF funds shall be included here

Part II: Supporting Pages								
PHA Name: The Housing Authority of the City of Columbia, SC			Grant Type and Number: Capital Fund Program Grant No: SC16P002501-20 Replacement Housing Factor Grant No:			Federal FY of Grant: 2020		
Development Number/Name	General Description of Major Work Categories	Development Account Number	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Central Office	Administration fees (10%)	1410	1	\$500,000				
AMP1	Gonzales Gardens; Arrington Manor; Atlas Road; Eastover, Yorktown Court							
	Operations (20%)	1406	1	\$200,000				
	Management Improvements	1408	1	\$20,000				
	General Capital Funds	1480	1	\$20,000				
AMP 2	Allen Benedict Court; Vista; Arsenal Hill; Wheeler Hill; Waverly ; SFH East							
	Operations	1406	1	\$200,000				
	Management Improvements	1408	1	\$20,000				
	General Capital Funds	1480	1	\$20,000				
AMP 3	Latimer Manor; Hammond Village; St Andrews Terrace; SFH West; Riversedge							
	Operations	1406	1	\$200,000				
	Management Improvements	1408	1	\$20,000				
	General Capital Funds	1480	1	\$20,000				
AMP 4	Reserves; Dorrah-Randall; Pinewood Terrace; Fontaine Place; Pine Forest; Rosewood; Corners; Greenfield; Archie Drive							
	Operations	1406	1	\$200,000				
	Management Improvements	1408	1	\$20,000				
	General Capital Funds	1480	1	\$20,000				
AMP 5	Lower Saxon; Upper Saxon; Columbia Apartments; Oakread; Fair Street; Elderly Cottages; Marion Street							
	Operations	1406	1	\$200,000				
	Management Improvements	1408	1	\$20,000				
	General Capital Funds	1480	1	\$20,000				
All AMPS	Housing Authority Wide							
	Demo	1485	1	\$300,000				
	Development Activites	1499	1	\$3,000,000				

\$5,000,000

	<i>Original</i>	<i>Revised</i>	<i>Obligated</i>	<i>Expended</i>
1406	\$1,000,000			
1408	\$100,000			
1410	\$500,000			
1430				
1440				
1450				
1480	\$100,000			
1485	\$300,000			
1499	\$3,000,000			
Totals	\$5,000,000			

Capital Fund Program Five-Year Action Plan			U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMB No. 2577-0226
					Expires: 2023
Part I: Summary					
PHA: Columbia HA/SC002		Locality: Columbia/Richland SC		X Original 5-Year Plan	Revision No:
Development Number/Name	Work Statement for Year 1 FFY 2020	Work Statement for Year 2 FFY : 2021	Work Statement for Year 3 FFY: 2022	Work Statement for Year 4 FFY : 2023	Work Statement for Year 5 FFY: 2024
1406 -Operations (20%)		\$1,000,000	\$800,000	\$600,000	\$500,000
1408 - Management Improvements		\$100,000	\$100,000	\$100,000	\$100,000
1410 - Administration (10%)		\$500,000	\$400,000	\$300,000	\$250,000
1480 - General Capital Fund		\$100,000	\$100,000	\$100,000	\$100,000
1485 - Demolition		\$300,000	\$200,000	\$100,000	\$50,000
1440 - Site Acquisition		\$0	\$0	\$0	\$0
1499 - Development		\$3,000,000	\$2,400,000	\$1,800,000	\$1,500,000
Capital Fund Financing- Debt Services		\$0	\$0	\$0	\$0
Total CFP Funds		\$5,000,000	\$4,000,000	\$3,000,000	\$2,500,000
Total Non-CFP funds		\$0	\$0	\$0	\$0
Grand Total		\$5,000,000	\$4,000,000	\$3,000,000	\$2,500,000

form HUD 50075.2 (4/2008)

Capital Fund Program - Five Year Action Plan				U.S. Department of Housingand Urban DevelopmentOffice of Public and Indian Housing		OMB No. 2577-0226	
PHA: Columbia HA/SC002						Expires: 2023	
Part II: Supporting Pages - Physical Needs Work Statement(s)							
Work Statement for Year: 2 FFY: 2021				Work Statement for Year: 3 FFY: 2022			
Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
AMP 1-5	Operations	1	\$1,000,000	AMP 1-5	Operations	1	\$800,000
COCC	Administration	1	\$500,000	COCC	Administration	1	\$400,000
AMP 1-5	General	All	\$100,000	AMP 1-5	General	All	\$100,000
AMP 1-5	Acquisition	All	\$0	AMP 1-5	Acquisition	All	\$0
AMP 1-5	Demolish	All	\$300,000	AMP 1-5	Demolish	All	\$200,000
AMP 1-5	Development	All	\$3,000,000	AMP 1-5	Development	All	\$2,400,000
Sub-Total Estimated Cost			\$4,900,000	Sub-Total Estimated Cost			\$3,900,000

form HUD 50075.2 (4/2008)

Capital Fund Program - Five Year Action Plan				U.S. Department of Housingand Urban DevelopmentOffice of Public and Indian Housing		OMB No. 2577-0226	
PHA: Columbia HA/SC002						Expires: 2023	
Part II: Supporting Pages - Physical Needs Work Statement(s)							
Work Statement for Year: 4 FFY: 2023				Work Statement for Year: 5 FFY: 2024			
Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
AMP 1-5	Operations	1	\$600,000	AMP 1-5	Operations	1	\$500,000
COCC	Administration	1	\$300,000	COCC	Administration	1	\$250,000
AMP 1-5	General	All	\$100,000	AMP 1-5	General	All	\$100,000
AMP 1-5	Acquisition	All	\$0	AMP 1-5	Acquisition	All	\$0
AMP 1-5	Demolish	All	\$100,000	AMP 1-5	Demolish	All	\$50,000
AMP 1-5	Development	All	\$1,800,000	AMP 1-5	Development	All	\$1,500,000
Sub-Total Estimated Cost			\$2,900,000	Sub-Total Estimated Cost			\$2,400,000

form HUD 50075.2 (4/2008)

Capital Fund Program - Five Year Action Plan				U.S. Department of Housingand Urban DevelopmentOffice of Public and Indian Housing		OMB No. 2577-0226	
PHA: Columbia HA/SC002						Expires: 2023	
Part III: Supporting Pages - Management Needs Work Statement(s)							
Work Statement for Year: 2 FFY: 2021				Work Statement for Year: 3 FFY: 2022			
Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
AMP 1-5	Management Improvements	1	\$100,000	AMP 1-5	Management Improvements	1	\$100,000
Sub-Total Estimated Cost			\$100,000	Sub-Total Estimated Cost			\$100,000

Work Statement for Year: 4 FFY: 2023				Work Statement for Year: 5 FFY: 2024			
Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
AMP 1-5	Management Improvements	1	\$100,000	AMP 1-5	Management Improvements	1	\$100,000
Sub-Total Estimated Cost			\$100,000	Sub-Total Estimated Cost			\$100,000

form HUD 50075.2 (4/2008)

Statement of Housing Needs

The U.S. Department of Housing and Urban Development (HUD) requires each year that housing authorities evaluate their needs and provide a detailed analysis of the demand for affordable housing within the local jurisdiction. Affordable housing needs may change over time and are contingent upon many factors to include labor markets, housing costs, income, life span, and accessibility. The 2020-2021 Annual Plan for Columbia Housing outlines that needs for housing within the City of Columbia and Richland County jurisdictions.

The Housing Authority of the City of Columbia (Columbia Housing) evaluates the needs for housing in the local area annually and uses the information to develop this strategic plan to address shortfalls, demand, and develop strategic transformation and acquisition plans upgrade current portfolio to better equality and more economically sustainable housing and add additional affordable housing to its inventory. This section of the CH's Annual Plan includes statistical data on the number of families seeking affordable housing assistance and provide demographic data on each waiting list.

Subcomponent A: Housing Needs of Families in the Jurisdiction Served by Columbia Housing

Housing Needs for Public Housing Waiting List Data and Needs Analysis

Area Median Income	Number of Families	Percentage
> 30% of AMI	5168	95.5975%
>50% of AMI	145	2.6822%
>80% of AMI	59	1.09%

Overall Housing Needs	Total Number of Renters Households Needed Overall	Impact Scale
	Affordability	5
	Supply	5
	Quality	3
	Accessibility	3
	Size	2
	Location	3

Income is often a factor that drives the need for affordable housing. According to data published by the *National Low Income Housing Coalition*, workers earning an average renter's wage of \$13.25 per hour pays an average rent less than the FMR for a one bedroom unit. The average household income for Columbia Housing's public housing applicants is \$6516. In comparison to the average renter's wage, the families who apply for housing has income significantly less than the average renter's wages. Using data from this statistical analysis further supports the need for

affordable housing in the Columbia and Richland County area and demonstrates that those individuals and families with income less than 50% of AMI make up 98 % of the Columbia Housing's waiting list.

Subcomponent B: Housing Needs of Families in Public Housing

Public Housing

The entire public housing waiting list was opened in August 2017 and closed in January 2018 apart from two categories which include housing for seniors age 62 and older and families qualifying for 4 and 5 bedrooms. In June 2019, after keeping the waiting lists open for a substantial period, Columbia Housing closed its waiting list due to the limited number of responses from applicants.

The greatest need for housing in the Public Housing Program continues to be one-bedroom units, which is currently (2993 applicants) followed by two-bedroom housing units, (1523 applicants). We continue to see the affordable one-bedroom demand continue to grow throughout the housing programs. Households granted HCVs continue to experience hardships finding one-bedroom units that fit within the payment standard. As a result, the Columbia Housing adopts payment standards that are more representative of the local market fair housing rates.

Housing stabilization for low income families is impacted by several factors. Although the demand for housing remains constant, our capacity to provide housing for families has decreased due to the decline of habitable public housing units. With Columbia Housing losing the ability to place families in Allen Benedict Court, a 246-unit development, fewer units were leased up in the public housing program in 2019-2020 fiscal year. ABC is community with many one-bedroom units which is our highest demand for housing. We are anticipating that this will increase the length of time one-bedroom eligible applicants will remain on the public housing waiting list. With the new leadership at CH, considerable efforts have been made to assess the existing housing inventory and determine the appropriate plan of action to ensure that all housing is safe for our residents.

A breakdown of public housing applicants consistent of special population consists of:

Demographic Categories	Number of Applicants
Elderly	252
Disabled Household Members	417
Families with Children	2197
1 Bedroom Applicants	2993
2 Bedroom Applicants	1523
3 Bedroom Applicants	385
4 and 5 Bedroom Qualified Families	959

The number of Senior Housing applicants for our Public Housing Program is currently 252, resulting in an increase of 137 from the beginning of the FY 2019-2020. The current number of near elderly applicants (ages 50-61) is 307 which is a substantial increase from 183 reported in the previous fiscal year. CH operates a HUD approved Housing Designation Program which provides a total of 257 housing units for elderly (age 62 and above) in the Oak Read Highrise and the Marion Street Highrise. As we continue to expand our portfolio, evaluation of the specific housing designations will be taken into consideration as we continue to seek more aging applicants and/or seek options such as HCVs and/or PBVs.

Section 8/Housing Choice Voucher Program Needs

The Housing Choice Voucher waiting list was opened December 18th through December 20th, 2019 to accept applications for the lottery. During the 3 days of intake, CH received 7655 applications. A system was developed to randomly select 3000 applications to be placed on the waiting list.

The Housing Choice Voucher Program remains the program of choice, presumably for its element of housing choice and the opportunity to port from one location to another. Partnering with other agencies during the lottery process increased the CHA's outreach and made the process accessible to many applicants who desire a voucher. The Housing Choice Voucher Waiting List is currently closed.

The current number of applicants on the HCV Waiting List is 3828. This number is inclusive of the 3000 randomly selected from the lottery and 828 already on the HCV waiting list.

Section 8 Moderate Rehabilitation Program

The total number of Section 8 MOD-Rehab applicants remaining on the Waiting List is 358.

Project Based Vouchers

In 2019, after careful analysis of CH's Project Based Voucher Program, it was determined that the process was not accurately followed in order to allocate the vouchers to Gable Oaks and Villages at Rivers Edge. As a result, tenants who were receiving subsidy under the PBV Program were offered Housing Choice Vouchers. This administrative change led to dissolving the current PBV Waiting Lists. All applicants were informed of the changes to the waiting list and offered to be placed on the HCV waiting list. This allowed Columbia Housing to streamline the existing PBV lists in which many applicants were listed on multiple lists and add more families to the nearly depleted HCV waiting list. The PBV Program at Columbia Housing will be re-established.

VASH Vouchers

The 2019 Point-In-Time count conducted by the United Way of the Midlands identified 188 Veterans experiencing homelessness in the Columbia area of which 30 being unsheltered. Although there continues to be a need to ensure that Veterans receive adequate housing, the turnover rate for VASH Vouchers is significantly high. This has required CH and the VA to create strategies to stabilize the Veterans and ensure that they are provided services that deter the likelihood of them becoming homeless again. The program has the capacity to fund 414 VASH Vouchers.

Housing Needs for Special Populations

Addressing homelessness in the Columbia area has been more of the strategic initiatives conducted by Columbia Housing. To increase the number of affordable housing units in the Columbia area and reduce wait time, the CH created a Homeless Program Department in 2007. The CH partnered with the City of Columbia, United Way of the Midlands and the University of South Carolina, School of Medicine to provide housing to chronically homeless individuals with disabilities through the Housing First Program. The CH continues to partner with numerous agencies in the Midlands Area Consortium for the Homeless (MACH) to create additional housing for homeless persons and families. Currently the total number of units funded under the programs is 73 units.

Data collected from the 2019 Point-In-Time Count indicated that the number of individuals experiencing homelessness decreased 23% over the last 5 years. The efforts are due to programs such as the Continuum of Care and HOPWA administered by Columbia Housing. The local area is seeing an increase in the number of youth ages 18-24 experiencing homelessness which has risen 35% since 2016. We have applied for the FUP Grant and will continue to pursue other options to address homelessness in youth and other populations such as those aging out of foster care.

HOPWA

The CH administers a multi part housing program for persons diagnosed with AIDS or and AIDS related illness through funding allocated by the Housing Opportunity for Person With AIDS (HOPWA) Grants funded mostly by the City of Columbia. Each year, Columbia Housing responds to requests for proposals to continue funding the program and provide housing to individuals and families with at least one person in the household diagnosed with AIDS. The program has been quite comprehensive in which CH established great partnerships with PALSS and University of South Carolina School of Medicine to provide supportive services for HOPWA families. Currently, there are 62 persons on the HOPWA waiting list.

1. The current HOPWA allocation for Housing Choice Vouchers provides funding for approximately 50 vouchers for persons diagnosed with AIDS or an AIDS related illness. This amount is substantially less than previous allocations which initially helped 95 families with vouchers.

2. The HOPWA Permanent Housing Program was created to address increasing rents and the inability of clients to locate housing. With funding allocated by the City of Columbia through the HOPWA Program, CHA purchased and renovated 9 units to provide housing for eligible individuals and families. The units are managed and maintained by property management staff.
3. The HOPWA Housing First Program provides housing for 15 persons who were homeless and diagnosed with AIDS or and AIDS related illness. The scope of this program includes CHA renting the units from landlords and paying utility costs for the tenants. This program is transitional to the HCV or Permanent Housing Programs.

The HOPWA Program is greatly needed to assist persons diagnosed with AIDS with stable housing and supportive services that include medical treatment. The reduction in funding over the past four years has decreased the number of families being served.

The following documents provide statistics on CHA's waiting lists

1. Public Housing
2. Housing Choice Voucher
3. HOPWA
4. MOD Rehab

Impediments to Fair Housing Choice

In 2017, Richland County in partnership with Columbia Housing development a comprehensive analysis assessment of fair housing. Within the report, various impediments were identified that impact housing access for special populations and protected classes. The assessment cited racially and ethnically concentrated areas of poverty within the county in addition to the Limited English Proficiency (LEP) barriers which increased over the past ten years. Additionally, the continued growth of elderly populations and access to affordable housing for persons with disabilities continue to be target areas of need. The Columbia Housing's PHA Plan creates affordable housing for the targeted populations who have impediments to housing of choice. Through the provision of fair housing education, promoting housing education through counseling, and making available various types of affordable housing opportunities, CH has implemented initiatives to address impediments fair to housing choice.

Strategy for Addressing Housing Needs

Strategy for Addressing Housing Needs

Section 9.0 of the Annual Plan identified housing needs for the local jurisdiction area. Based on the information provided, the greatest housing needs are for individuals with low income, needing one and two bedrooms. To meet the most significant housing needs in the local area, the Columbia Housing had to assess its existing capacity. The current public housing portfolio has 1684 habitable units and 4034 Housing Choice Vouchers. The number of individuals on the combined waiting lists exceeds the availability of housing resources controlled by CH. As a result, we have identified several strategies to address housing needs and support the most vulnerable population of citizens in the area.

Possible Strategies for Addressing Needs

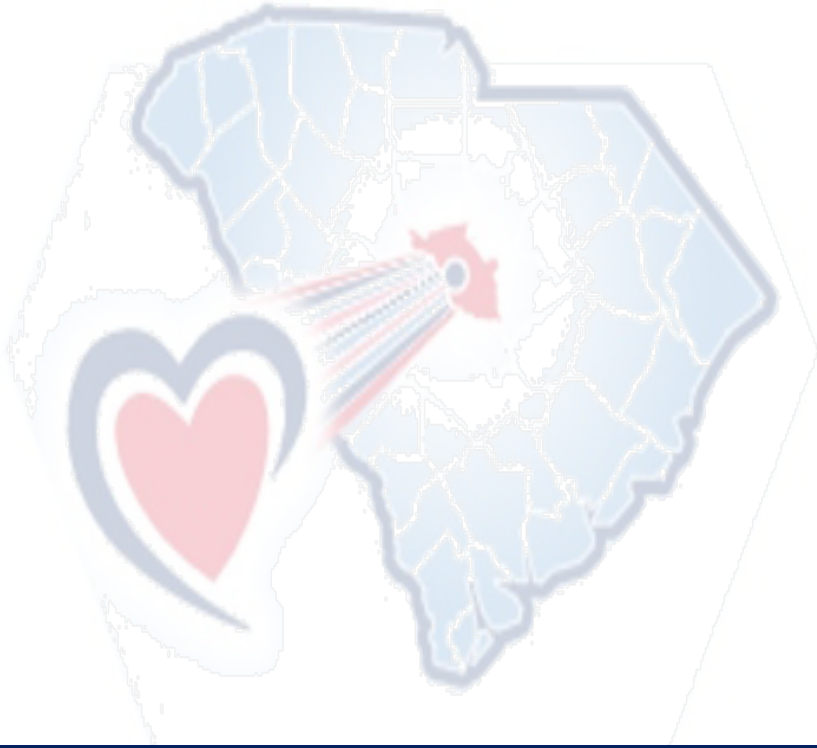
The low vacancy rate for affordable housing becomes a challenge when helping families with HCV secure quality housing in desired areas. Due to the lack of inventory for affordable housing in Columbia, there is not enough affordable housing (less than allowed under the Fair Market Rents) for families and individuals to lease up their vouchers. The CHA continues to see more families doubling up, because they cannot pay the private market rents, which are frequently above the Fair Market Rents (FMR).

Possible Strategies for Addressing Housing Needs	Indicates Adopted Strategies	Reason for employing Strategies
Maximize the number of affordable housing units available to the PHA within its current resources	x	Ensure that housing is accessible and free of health hazards
Increase the number of affordable housing units	x	Decrease homelessness and number of families needing affordable housing
Target available assistance to families at or below 30% of AMI	x	The PH waiting list is 95% applicants at or below 30% of AMI
Target available assistance to families at or below 50% of AMI	x	
Target available assistance to elderly	x	Ensure that one of the most vulnerable populations have stable housing
Target available assistance to families with disabilities	x	The CoC Homeless Program targets housing

		for disabled homeless families
Increase awareness of PHA resources among families and ethnicities with disproportionate needs	x	Inform more LEP families of housing resources

The following activities will support the strategies for addressing housing needs for low income individuals and families.

- Reposition current portfolio to create more sustainable housing stock and leverage resources to expand initiatives to create more affordable housing;
- Create partnerships with other housing providers;
- Expand the number of HCV landlords participating in the program;
- Administer special population programs such as Continuum of Care, VASH, HOPWA, and Family Unification Grant;
- Redevelop housing on public housing property that has been demolished;
- Maintain lease up rate of 98% for the HCV Program;
- Capitalize on financial resources by liquidating nonpublic housing assets and
- Promote LEP outreach activities.



COLUMBIA HOUSING

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EXHIBITS

EXHIBIT A

Rental Assistance Demonstration

The Columbia Housing Authority intends to submit an application to convert various Public Housing communities to Project Based Vouchers under the guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-23, REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are describe below. Additionally, the Columbia Housing Authority certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing CHA with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that CHA may also borrow fund to address their capital needs. CHA will also contribute Replacement Housing Factor (RHF) funds and Public Housing Reserve funds in the amount of approximately \$3 million dollars.

Significant Amendment Definition:

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

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

UNITS ANTICIPATED TO BE CONVERTED UNDER RAD

The chart below identifies the units anticipated to be converted under RAD. The RAD conversion will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. There will be no change in bedroom distribution, all bedroom sizes will remain the same post-conversion.
3. There will be no transfer of assistance under the RAD conversion.

RAD CONVERSION	TOTAL UNITS	PROPERTY TYPE
Archie Drive	25	Family
Arsenal Hill	20	Family
Atlas Road	25	Family
Congaree Vista	25	Family
The Corners	24	Family
Elderly Cottages	10	Elderly
Fair Street	16	Family
Fontaine Place	25	Family
Greenfield	8	Family
Overbrook and Thornwell	6	Family
Pine Forest	28	Family
Pinewood Terrace	25	Family
Rosewood Hills	24	Family
Waverly Apartments	20	Family
Wheeler	16	Family
Arrington Manor (75/25)	58	Elderly
Rosewood (75/25)	40	Elderly
Hammond Village (75/25)	78	Family
UNITS PRECONVERSION	473	
UNITS POST CONVERSION	473	

PROJECT BASED VOUCHERS RESIDENT RIGHTS AND PARTICIPATION

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

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

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

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

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

Three Year Phase-in:

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

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5: AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

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

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

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

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

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

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. 14 days in the case of nonpayment of rent; and
 - iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

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

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

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

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

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but [are](#) not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as “PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

PBV: Other Miscellaneous Provisions

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

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

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.

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

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

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

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

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

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

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

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

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

FIVE YEAR STRATEGIC PLAN

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

Mission Statement: Because CH Cares, we are leveraging the power of housing to build a foundation for individuals to thrive.

2020-2024 Strategic Goals

- I. **Public Housing:** Develop and implement repositioning strategies for all public housing properties.
- II. **Housing Choice Voucher Program:** Maximize leasing capacity based on annual budget authority. Maintain program compliance, in accordance with HUD regulations.
- III. **Development and Capital Improvements:** Support repositioning of the existing portfolio through recapitalization, conversion, and preservation.
- IV. **Resident Strategies:** Strengthen relations with the people we serve by increasing mutual accountability and by improving our ability to connect them to vital serves in the community that will foster economic self-sufficiency and quality of life opportunities.
- V. **Homeless Programs:** Expand our collaborative partnerships with county and citywide efforts to reduce families at risk of experiencing homelessness or at risk of losing housing.
- VI. **Homeownership:** Create opportunities for residents and program participants through the coordination of homebuyer education, resources and activities that increase homeownership opportunities.
- VII. **Human Resources and Personnel Development:** Embrace the agency's new identify by transforming its organizational structure and culture through establishment of a track record for integrity, accountability, collaboration, and exceptional customer service.

- VIII. **Community Safety and Security:** Develop a comprehensive strategy through the engagement of Columbia Housing's communities and law enforcement agencies that can improve public safety and the quality of life within its communities.
- IX. **IT Operations:** Innovate the way Columbia Housing maintains a smooth functioning of its infrastructure and operational environments that support application deployment to its internal and external customers (i.e. residents and families).
- X. **Communications and Community Engagement:** Build support for housing as a key component of vibrant, sustainable communities through the communication of public information, engagement and advocacy that promotes affordable housing and supports the advancement of low wealth individuals and families.
- XI. **Violence Against Women:** Enforce and protect the rights of victims of domestic violence, dating violence, and stalking to secure and maintain housing without being victimized a second time by being denied housing or losing housing because of the criminally violent acts perpetrated against them.

**Columbia Housing Authority
Five Year Agency Goals
2015-2020**

Mission Statement: To meet the emerging housing needs of low to moderate income individuals and families in the City of Columbia and Richland County while promoting self-reliance and improve the quality of life

I. Goal: Preserve, maintain, and develop quality, affordable public housing while adapting to changes in HUD program regulations regarding public housing.

1. **Objective: Continue to identify funding opportunities, to include HUD programs such as the Choice Neighborhood Grant Program or other government programs to build new housing.**

2015 Progress: The CHA has been waiting for the choice Neighborhood Grant Program to announce Implementation Funding and will apply if/ when funding is available. CHA purchased 7 single family homes at Rosewood Hills and converted them to public housing units. The CHA used Housing Replacements Funds and Capital Funds to purchase 16 units at Yorktown Apartments.

2016 Progress: The CHA has begun redevelopment at Gonzales Gardens by constructing 12 single family homes in the expanded footprint. The CHA has also purchased a quadruplex in Irmo and is evaluating whether to add this to the Public Housing inventory.

2017 Progress: The CHA has created a plan to redevelop Gonzalez Gardens and Allen-Benedict Court. Twelve single family homes were built in 2017 and six have already been sold. The CHA completed its application for the Choice Neighborhood Implementation Grant in November 2017 in the amount of \$ 29,905.676.

2018 Progress: CHA has further developed Architectural and Engineering plans to redevelop Gonzales Gardens. Relocation of residents and demolition of dwelling units completed at Gonzales Gardens. All twelve single family homes built in 2017 have sold and six additional homes are under construction as Phase 1 of the redevelopment of the Gonzales Gardens site. The 2017 Choice Neighborhood Implementation Grant application was not successful. CHA reapplied in 2018 with the focus of the grant request on the demolition and revitalization of Allen Benedict Court.

2019 Progress: 2019 Progress: CHA spent funds on maintaining high standards of living in our units. 8 single family homes were built on the Gonzales Gardens (GG) site. Additional property was purchased and buildings demolished for additional lane for the GG project. Working with the city and other partners to close the financial gap which is holding up redevelopment.

2. **Objective: Evaluate and identify these Public Housing Communities for conversion to Rental Assistance Demonstration Program (RAD): Rosewood Hills, Vista, Atlas Road, Archie Drive, St. Andrews Terrace, and/or Fountain Place.**

2015 Progress: The CHA has evaluated a RAD application for the Cayce Housing Authority and has determined not to proceed with the RAD at this time. The CHA will continue to evaluate if an application for the housing authority should be made, if any new regulations are presented.

2016 Progress: The CHA opinion on RAD Conversion has not changed. No progress

2017 Progress: No action on RAD was taken in 2017. The CHA will not implement a RAD Program unless the financial provisions of the program change

2018 Progress: No action was taken to transform PH units to RAD. CHA will continue to evaluate the feasibility of transferring inventory from public housing to RAD.

2019 Progress: CHA has inventoried all of our units in preparation for repositioning.

3. Objective: Target use of Capital Funds to rehabilitate communities identified for RAD.

2015 Progress: No Activity at this time

2016 Progress: No RAD activity in 2016

2017 Progress: Because the CHA will not participate in RAD, there were no activities this year.

2018 Progress: \$1,197,008.16 in Capital Funds dollars were spent rehabilitating units. CHA has not committed to transitioning any units to RAD.

2019 Progress: Larger renovation projects were put on hold and funds were frozen for repositioning expenses.

4. Objective: Utilize Capital funds to renovate the most deteriorated single family houses identified by management.

2015: Five single family homes were renovated in 2015. CHA will continue to renovate CHA houses using Capital Funds as funding remains available.

2016: Eighteen single family homes were renovated in 2016. CHA will continue to renovate CHA housing using Capital Funds as funding remains available.

2017: The CHA continues to renovate its single family homes and plans that all homes will be completed by 2020.

2018: Capital Funds were used to renovate 33 single family homes.

2019 Progress: Multiple homes were renovated with a shift toward more strategic spending.

5. Objective: Evaluate on an annual basis communities and/or single family houses to be demolished or sold.

2015: CHA received approval in December 2015 to demolish Gonzales Gardens (anticipate4d to be demolished by June 20174). Two houses were impacted by the October 2015 flood is currently under review whether to demolish or repair.

2016: CHA has decided to accept the request by Richland County to purchase the property at Raintree Court. The property is not in a flood hazard area and was significantly damaged during the 2015 flood.

2017: CHA has almost transferred the property at Raintree Court and has received HUD's approval to dispose of the property. The closing should be completed by June 30th 2018.

2018: Demolition of Gonzales Gardens was completed in 2018. We anticipate the demolition of ABC in 2019.

2019 Progress: CHA has inventoried all of our units, especially SFH, in preparation for repositioning.

6. Objective: Incorporate green building practices in all new construction and renovation work where economically feasible within HUD Total Development Costs.

2015: The 7 single family houses purchased through the Rosewood Hills HOPE VI all meet the green HUD standard.

2016: The CHA has begun construction on 12 new homeownership units in the expanded footprint at Gonzales Gardens. CHA will offer these for sale in 2017.

2017 Progress: Twelve of the houses at Gonzales gardens were constructed and six have already sold. All of these houses were built using green building practices.

2018 Progress: The twelve new homes off the footprint from GG have all sold and were all constructed with green building practices. Six new green homes are under construction as the first phase on the footprint of.

2019 Progress: All building projects were completed with green building practices where practical.

7. Objective: Maintain HUD High Performing Authority status according to PHAS Scores.

2015 Progress: CHA score was 90%; High Performing Housing Authority

2016 Progress: CHA score was 90%; High Performing Housing Authority

2017 Progress: CHA score was 87%; the CHA is appealing this score because a low score in the occupancy category. The score was based on the vacancies at the Gonzales Gardens which should have not been included in the assessment.

2018 Progress: CHA's PHAS Score was 84% (Standing Performing Housing Authority).

2019 Progress: Columbia Housing as of 02/21/2020 has not received its 2019 PHAS Score.

II. Goal: Increase the number of housing choice vouchers in order to provide quality, affordable housing in Richland County.

1. Objective: Apply for 300 additional housing choice vouchers through the Opt Out Program, HUD applications, HOPWA, Mainstream Voucher Program, Veterans (VASH) program, Welfare to Work, Family Unification Program, and other new HUD Housing Choice Voucher Programs that are developed.

2015 Progress: CHA has just received HUD notice that FUP will be available and CHA will apply

2016 Progress: CHA has applied for 20 project based Vouchers for VASH(Veteran's Affairs Supportive Housing) ; waiting to hear if we are in the second round of funding in June 2017. CHA may also apply for a PBV set-aside for the existing VASH. CHA will apply in 2017-2018 for any opportunities for an expansion in the Voucher Program.

2017 Progress: CHA will apply in 2018-2019 for any opportunities for the expansion in the Voucher Program. The VASH Program is now funded at 414 vouchers. The CHA received 270 vouchers for replacement housing for Gonzalez gardens.

2018 Progress: The CHA applied for and was awarded 40 Mainstream Vouchers. The CHA has contacted the local HUD office in an effort to set aside HUD/VASH Project based vouchers.

2019 Progress: The CHA applied for the Family Unification Grant in 2019. Status of the application is unknown to date.

2. Objective: Maintain a high-performing status on SEMAP score.

2015 Progress: CHA received a score of 100%; high –performing housing authority

2016 Progress; CHA received a score of 86%; standard performing housing authority. The CHA has immediately corrected this issue. The biggest problem was leasing of the vouchers which coincided with the opening of two Project Based Vouchers Projects. Both are now 100% occupied.

2017 Progress: CHA received a score of 100%; an overall performance rating of HIGH. The CHA'S success can be attributed to the program utilizing the allocated funding and being leased up.

2018 Progress: The CHA received a 96% high score on the latest SEMAP.

2019 Progress: Progress: CHA received a 78% score on the latest SEMAP which is standard. Deficiencies were Indicator 4 – Utility Allowance Schedule which requires a study be conducted annually. Since this deficiency was discovered the PHA has entered into an agreement with Nelrod Company to complete the required study. The study as completed and new allowances schedules were provided to the PHA in February 2020. Deficiencies were also indicated in Indicator 13 – Lease Up. CHA is aggressively working to lease up to the standard required.

3. Objective: Provide voucher mobility counseling to Section 8 Housing Choice Voucher Program participants. 10% of issued vouchers will be located in non-concentrated areas.

2015 Progress: CHA met goal of 10%. Voucher mobility counseling is included in the Section 8 Orientation.

2016 Progress: Voucher mobility counseling is included in each Housing Voucher orientation.

2017 Progress: Voucher mobility counseling is included in the Housing Voucher orientation.

2018 Progress: The CHA provided voucher mobility counseling to encourage participants to utilize their voucher in non-concentrated areas. The majority of affordable housing units are concentrated in the same areas. The CHA continues its efforts to recruit additional landlords in non-concentrated areas.

2019 Progress: Voucher mobility counseling is provided during the Housing Choice Voucher briefing and efforts continue to recruit new landlords.

4. **Objective: Expand the number of landlords participating in the Section 8 Housing Choice Voucher Program.**

2015 Progress: CHA conducted a Landlord's Meeting in July 2015. Eighty landlords attended.

2016 Progress: With the increase in the need for available units for voucher holders and an overall reduction in available housing due to the flood in October 2015, the CHA has been aggressively trying to recruit landlords to become HCV landlords.

2017 Progress: The CHA has begun working collaboratively with community partners in an effort to recruit more landlords. The CHA in partnership with UWAY will host a landlord forum further engage potential and current landlords.

2018 Progress: The CHA hosted an annual landlord forum in partnership with other community partners to recruit new landlords and educate existing landlords.

2019 Progress: The CHA continued pursuing avenues to engage new landlords in the program.

5. **Objective: Conduct a minimum of one training program per year for landlords to increase their knowledge of the Section 8 Housing Choice Voucher Program.**

2015 Progress: One landlord training was conducted 2015 (July). Another landlord program is now being planned for 2016.

2016 Progress: The CHA held a meeting with landlords on June 20, 2016 at the Tillis Center. A Q&A session was offered for all landlords that were present. Another landlord program is currently scheduled for March 2017.

2017 Progress: The CHA hosted a landlord forum in March in an effort to engage new and existing landlords. Additionally, the CHA plans to host another landlord forum to increase landlords' knowledge of the HCV Program. The CHA will also create in 2018 a Landlord Newsletter to continue training landlords on housing issues.

2018 Progress: The CHA hosted an annual landlord forum in partnership with other community partners to educate both new and existing landlords.

2019 Progress: Landlord trainings were not conducted in 2019.

6. **Objective: Maintain voucher payment standards at 90%-100% of the FMR.**

2015 Progress: In December 2015, the CHA Board of Commissioners approved an increase of payment standard to 110%. This will allow for expansion of the vouchers in areas of non-concentration. The current FMRs are not meeting the rents that are offered by landlords.

2016 Progress: Because the CHA was experiencing a low lease-up for new Vouchers in 2016, the CHA requested and received board approval to increase the voucher payment standards at 110%.

2017 Progress: Because CHA has been able to maintain a steady lease up of vouchers, the CHA requested board approval to keep the payments standard at 100% while giving the ED the authority to decrease or increase from 90%-100%.

2018 Progress: The CHA has an allowable voucher payment standard 90%-110% of the FMR. The current payment standard approved by the Board of Commissioners is 90% of the new FMRs. Based on bedroom sizes, the standards are as follows: (0) \$671, (1) \$838, (2) \$959, (3) \$1255, and (4) \$1571. This revision became effective January 1, 2019.

2019 Progress: The current payment standard approved by the board is 100% of the FMR's

III. Goal: Increase the inventory of private market housing owned and/or managed by the CHA.

1. **Objective: Complete the West Avenue development to add to the Non-HUD housing inventory.**

2015 Progress: CHA purchased the property and is in the design phase of the project. Infrastructure and the unit design are being developed by contracted planners and architects. Construction should begin by fall 2016.

2016 Progress: During 2016, the CHA worked to finalize the design phase of the project and applied for demolition funds from the City of Columbia. CHA began demolition of the existing structure in February, 2017. Construction will begin in 2017 at the completion of demolition.

2017 Progress: With the demolition of Gonzales Gardens completed, the CHA aggressively replacement housing. The CHA purchased Petan Apartments, Bentley Apartments, Springwood Apartments, and purchased some additional apartments at Winsor Lake (40 already in inventory). At the time CHA printed its Annual Plan, the CHA was in the process of purchasing English Meadows. The total number of the units in the CHA's was in the process of purchasing English Meadows. The total number of units in the CHA's private market inventory is 500 at this time.

2018 Progress: CHA completed the purchase of English Meadows. CHA/CHAD closed on financing for Lorick Place and construction has commenced on the site for 87 two bedroom project-based units.

2019 Progress: CHA built and sold 8 SFH on the old GG site.

2. **Objective: Evaluate current and new HUD programs as sources of housing development funds.**

2015 Progress: CHA purchased a tri-plex and a new single family home for persons with AIDS using HUD HOPWA funding

2016 Progress: The CHA will apply for a VASH Project Based Voucher (PBV) to build 20 units of VASH BV. CHA will continue to look for units under the ACC up to the original 2,400 units of Public Housing that was in 1999.

2017 Progress: With the demolition of Gonzales Gardens and planned demolition of Allen-Benedict Court, the CHA needs to develop replacement housing. The CHA submitted a Choice Neighborhood Implementation Grant in November, 2017. The biggest focus for redevelopment for these two complexes will be the submission of a tax credit application and the creation of these bonds financing, or any new program that comes to fruition through any government agency or financial Institution.

2018 Progress: CHA was unsuccessful with the 2017 and 2017 Choice Neighborhood Implementation Grant applications. CHA is exploring all other funding sources, public and private, to accomplish the revitalization of GG and ABC.

2019 Progress: CHA is constantly seeking other sources of funding for our units, included is the 4% and 9% LIHTC.

3. Objective: Explore opportunities to partner with local entities to develop housing to include the Midlands Housing Trust Funds and the South Carolina Community Loan Fund Bank.

2015 Progress: The new grocery store (Honor Capital and Save-a-lot partnership) was opened as result of funding from the SC CLFB loan of \$600,000. CHA continues to meet with both entities to further develop housing. A new Tax Credit Project (Bush Place) is being developed and MHTF, SCCLFB, and the City of Columbia are all involved in the development for the financing project.

2016 Progress: The Midlands Housing Trust Fund was instrumental in assisting the Villages at Rivers Edge private housing match with was completed for lease-up (HCV PBV) in June 2016.

2017 Progress: The CHA completed construction on 12 Homeownership units in the footprint of Gonzales Gardens. This was done in partnership with the City of Columbia and Richland County.

2018 Progress: CHA sold seven of the 12 homes developed off the footprint of Gonzales to 50-80% AMI homebuyers through a collaboration of Richland County and City of Columbia HOME Funds, CDBG funds and City/State NSP funds. CHA demolished Gonzales Gardens with NIP funds from State Housing through the City of Columbia. Through CDBG DR funding, the City of Columbia committed gap funding to assist with the construction of Lorick Place.

2019 Progress: CHA has reached out to several agencies for partnerships in housing and development such as South Carolina Department of Mental Health, Homeless No More, The United Way of the Midlands, and Merci.

4. Objective: Seek to partner with City of Columbia and/or Richland County for CDBG funds or General Funds to acquire, renovate, and develop new affordable housing.

2015 Progress: CHA has just submitted a \$53,500 CDBG application to the City of Columbia for a new affordable housing project; “Learned to Build House.” HUD has recently awarded the City of Columbia, Richland County, and Lexington County funding as a result of the flood in October 2015. The CHA has contacted all three entities about the development of either new construction/rehabilitation for flood victims.

2016 Progress: The CHA anticipates beginning of construction in March 2017 on the Learning to Build Houses. The CHA continues to plan for the replacement of housing once Gonzales Gardens has been demolished.

2017 Progress: The CHA was awarded a \$50,000 CDBG Grant for construction of a Little House. The house should be completed in 2018. The CHA also partnered with Richland County to create an Assessment of Fair Housing, this was HUD approved in March 2017. The CHA is working with the County to achieve the goals created in the Plan.

2018 Progress: CHA was not successful in building the Little House Project. Funds were received from the Disaster Relief Program to be used as a gap in developing Lorick Place.

2019 Progress: CHA is in constant communication about existing and extra funds that the city and county have made available. CHA has received funds for the Lorick Place development and have been promised more funding for the redevelopment of GG.

5. Objective: Evaluate the available housing inventory for potential purchase in Richland County to increase CHA inventory utilizing leveraged funds

2015 Progress: This is ongoing. The CHA purchased Elmtree Georgetown Apartments (78) units and Falling Springs (146 units) in 2015. The CHA has identified several other properties for possible purchase but no definitive action has been taken at the time the Annual Plan was developed.

2016 Progress: The CHA purchased Petan Apartments (99 units) in January 2017. At the February 2017 CHA Board Meeting, the Board also approved the purchase of a quadraplex in the Irmo area.

2017 Progress: The CHA purchased Petan, Bentley, Windsor, and Springlake in 2017

2018 Progress: CHA did apply to the City of Columbia for Disaster Relief funds to use a gap in financing for Lorick Place. CHA entered into a partnership with SCDMH to purchase the property at Carter Street and closed on the 4 remaining units at Yorktown.

2019 Progress: CHA’s current strategy is to first reposition our properties then seek out additional properties.

6. Objective: Construct new housing units on CHA owned vacant lots with available funding.

2015 Progress: The CHA is exploring the expansion of the Little Houses project in 2016. The CHA is preparing bid packets to bid 5 houses on vacant lots in the Rosewood Hills and Harrison Road communities.

2016 Progress: The CHA continues to work on the Little Houses Project with Richland County School District One. Houses are to be completed in March 2018. CHA has started 8 units at the Gonzales Gardens expanded footprint and will put these for sale in 2017.

2017 Progress: The CHA received approval from the city of Columbia to move the little house project to this fiscal year and the house should be completed in March 2018. CHA sold two lots on Pinehurst; developer built single family homes on these two properties. The CHA also built three more homeownership units at Rosewood Hills; these houses sold within 1 month of the start of construction.

2018 Progress: CHA began construction on 8 single family homes in GG.

2019 Progress: This is not an immediate need for CHA.

IV. Goal: Increase the inventory of non-HUD housing to include programs like the Continuum of Care and HOPWA.

1. Objective: Develop 15 units for assisted living to meet the housing needs of elderly and disabled persons.

2015 Progress: There has been no available funding to construct this type of housing/programs. CHA continues to monitor programs of this type across the country. CHA participated in dialogue with SC Disabilities and Special Needs to create more housing for disabled persons during September/October 2015.

2016 Progress: There has been no further progress in this area. No HUD funding or alternative funding has been identified.

2017 Progress: There has been no further progress in this area. No HUD funding or alternative funding has been identified.

2018 Progress: No HUD funding was used to increase HOPWA inventory. HUD funds were used to expand the CoC Program by 5 units.

2019 Progress: No action was taken on this objective. Plans are in place to redevelop the property Gonzales Gardens with a senior complex.

2. Objective: Evaluate on an annual basis funding opportunities for HUD Community and Planning Development Programs to include Continuum of Care and HOPWA housing programs. Maintain and continue existing housing units under these programs.

2015 Progress: CHA submitted a new application for Family and Youth funding under the Continuum of Care in November 2015. In January 2016, five applications for HOPWA funding were submitted to the City of Columbia.

2016 Progress: CHA received the 8 new units under the Continuum of Care (Housing First Expansion).

2017 Progress: The CHA continued many of the activities identified in 2016.

2018 Progress: CHA received 5 new units under Continuum of Care (Housing First Expansion Plus).

2019 Progress: The CoC Program was funded and remained at its 2018 funding level.

V. Goal: Improve the Quality of Life for those individuals and families residing in public housing units.

1. Objective: Continue to expand public housing security efforts and to work with the City of Columbia Police Department and the Richland County Sheriff's Department.

2015 Progress: The CHA continues to monitor all criminal activity on a weekly basis in conjunction with local law enforcement. Security cameras were added to the Dorrah Randall Community and the Reserves in the County. The City of Columbia installed additional cameras on the street outside of the Latimer Manor community. The County installed cameras at the Eastover Community. The CHA has started meeting on a quarterly basis with the City and County to better provide a higher level of security for residents.

2016 Progress: The CHA continues to monitor all criminal activity on a weekly basis in conjunction with local law enforcement. Property Managers AND Security meet with The City of Columbia Police Department on a quarterly basis to better provide a higher level of security for residents. The amount of police reports remained almost the same in 2016 compared to 2015.

2017 Progress: The CHA revised its strategy for law enforcement at the Authority. The CHA hired two more constables to live in public housing. They patrol the properties during the evening hours. The CHA eliminated the security guards under contract.

2018 Progress: The CHA continued monitoring all criminal activity on a weekly basis in conjunction with local law enforcement. One of CHA's officers is a liaison between the housing authority and Richland County Sheriff Dept. Gang Prevention Unit. Two of CHA's officers reside in our communities.

2019 Progress: The CHA continued monitoring all criminal activity on a weekly basis in conjunction with local law enforcement. One of CHA's officers is a liaison between the housing authority and Richland County Sheriff Dept. Gang Prevention Unit.

2. Objective: Develop educational, cultural, and supportive service programs to further foster social and economic independence for the elderly.

2015 Progress: The CHA has a tremendous number of activities for elderly public housing residents. A partnership with the Historic Columbia Foundation created an innovative genealogy program for the elderly. Trips were provided to healthy activities in the community such as the Women's Health Conference and Healthy Learners. The Mobi-Rec makes visits to the high-rises for the elderly. Membership is provided to the local City Wellness Center. Residents attend numerous concerts and sporting activities at the University of South Carolina.

2016 Progress: The CHA continue to encourage elderly persons to participate in community events to include: MLK Weekend, computer classes with Fast Forward, Historic Columbia History Program, NCAA Women's Basketball Tournament, Women at Heart, Fall fling (statewide event), an several University events.

2017 Progress: The CHA continued many of the activities identified in 2016.

2018 Progress: The CHA has programs and supportive services designed during the year for the seniors of the agency. There are a wide range of services and activities provide for our senior residents to include but not limited to transportation to doctor's appointments, healthcare partnerships with Palmetto Health that include onsite nurses and social workers, along with community dinners and bingo parties. We had over 50 seniors attend the "Women at Heart" event on Saturday, February 25th 2018. A Soup Meal program was started for seniors at the Oak Read High-rise on Wednesdays. This program is funded and run by Columbia SC Conference for AME/Women in Ministry, "Fit for Life" Project. Participants were provided a meal, free clothing and breads to take home. During meal time residents are given tips for promoting healthy eating, physical fitness along with life skills, family support and spiritual growth. A partnership with Zeta Phi Beta secured a (\$1,700) cash donation for the residents of Oak Read High-rise. CHA expanded the Senior Commodity Supplemental Food Program (CSFP) from 45 boxes to 135 boxes. Increased the 2018 Families Helping Families Program Senior Donations to 300. CHA sponsored a Christmas Gala for seniors

2019 Progress: The CHA has programs and supportive services designed during the year for the seniors of the agency. There are a wide range of services and activities provided for our senior residents to include but not limited to transportation to doctor's appointments and grocery store shopping. Along with healthcare partnerships with Palmetto Health/Prisma Health that include onsite nursing referral and social workers. We have created local community partnerships with churches and nonprofits to provide in-house dinners and bingo parties.

****Seniors Participated in the "Wellfest" event sponsored by Prisma Health**

****We have a Soup Meal program for seniors at the Oak Read High-rise and Marion Street high-rise. This program is funded and run by Columbia SC Conference for AME/Women in Ministry, "Fit for Life" Project. Participants were provided a meal, free clothing and breads to take home. During meal time residents are given tips for promoting healthy eating, physical fitness along with life skills, family support and spiritual growth.**

****Senior Residents participated in the Senior Commodity Supplemental Food Program (CSFP) with Harvest Hope.**

****Senior Residents participated in the Families Helping Families Christmas Gift program sponsored by Palmetto Project.**

**** Seniors participated in the RIC Senior Christmas Gala in Greenville, SC.**

3. Objective: Implement programs that promote a healthy lifestyle for all public housing populations (youth, elderly, families) to include community gardens and health education.

2015 Progress: The CHA held a press conference regarding the new MOBI-REC Recreational van that visits public housing communities. A partnership with the University of South Carolina provided food boxes direct from the Farmer's Market at a below market price, delivered directly to the clients at their housing units. The Girls on the Run program was conducted at two housing communities; this is not only an exercise running program, but an empowerment program for young females.

2016 Progress: The Largest efforts during 2016 are that the CHA became a Smoke- free Housing Authority. The CHA continues to work with public housing residents who smoke to refer them to programs. This was a tremendous effort; in less than 9 months, the CHA met with every public housing community and posted signs and explained their new policy.

2017 Progress: The CHA partnered with Richland County public library to create a new branch of the public library in the zip code 29204. The new library will include community gardens and various educational activities. The CHA will have health education programs at the library. Also, food share, a project of USC, developed a cooking kitchen at the CHA'S grocery store.

2018 Progress: CHA partnered with Carolina Cares for Kids. This organization is an interactive program for our youth, run by students from the University Of South Carolina College of Pharmacy. The focus of this program is to promote health and education in our youth to benefit them presently and in the future. Topics explored were Nutrition, Personal Hygiene and Germs, Mental Health & Emotions, and Physical Activity. Collaborated with Palmetto Health to organized health screenings for young adults and the elderly. The FoodShare SC Project, located in the Save A Lot Grocery Store provided CHA residents information on managing their blood pressure, weight, and blood sugar through healthy cooking. The Cooperative Ministry continued to partner CHA for free tax preparation services at the CHA hosted the 31st Wall of Fame Program, 5th CHA Father's Day event, and Fall Festival.

2019 Progress: **Information was picked up and passed on to our residents about the "Construction Training Center" to all CHA residents. Construction Training Center is a private career training institution specializing in heavy industrial construction crafts. Each program takes a minimum of four months (16 weeks) to complete.

**All CH Residents with CH ID cards were allow admission to the Charles R. Drew Wellness Center for use of the exercise equipment, pool, gym and walking track during their business hours.

**The FoodShare project was located in the Save A Lot Grocery Store. CHA residents were able to participate in courses that assisted them in managing their blood pressure, weight, and blood sugar through healthy cooking. The courses had multiple sessions, each comprised of a 30-minute nutrition education and 1.5 hours of practical lessons in the teaching kitchen. Sessions center on the major food groups—fruits, vegetables, whole grains, dairy, and protein—represented in the U.S. Department of Agriculture [MyPlate](#) guidelines. Residents learned about each food group's nutritional makeup, proper portion sizes, supply and cost, and clinical applicability in treating diet-related diseases.

**Columbia Housing applied and received a grant from USDA to sponsor our youth summer feeding programs. The program started on Monday, June 17th – Friday, August 19th. 2019. Health approved meals were provided for youth in the following communities. Latimer Manor, Hammond Village, The Reserves, Village at River Edge and Capital Heights.

** Cooperative Ministry/Free Tax Preparation-Free tax preparation service is provided for Households making \$54,000 or less Photo Id & Social Security Cards required Free Tax Preparation Opened January 28th –April 16th at the Tillis Center.

** June 5th CH held a Health & Wellness event at the Tillis Center for All Residents. Health Screenings and referrals were available.

**In partnership with Benedict College over 100 Thanksgiving Baskets were given out to CHA residents with fresh fruits and vegetables in the baskets.

**October 2019 Residents were provided tickets for Benedict College Homecoming. Transportation was provided and a free Tailgate for all residents.

**2019 "Fall Festivals" was held at Hammond Village community.

4. Objective: **Increase youth programs for public housing residents by fostering partnerships in the community.**

2015 Progress: The Girl's on the Run program and USC are great Partnerships for our youth. The CHA conducted a Golf Tournament which provided 5 scholarships for youth to attend college. Dawn Staley, USC Women's Basketball Coach, provided over 600 pairs of sneakers to youth at two public housing communities. Youth were encouraged to make the honor roll in school and if they did, they received another pair of new shoes. CHA conducted the International Festival, the Fatherhood Initiative, and the Wall of Fame Program; all of these events are made possible through partnership in the community.

2016 Progress: The CHA continued to programs that were done in 2015. CHA conducted its 2nd Golf Tournament and provided 10 scholarships.

2017 Progress: The CHA continued the programs identified in years 2015-2016.

2018 Progress: CHA continued the relationship with Richland County Library to offer the Here Comes Kindergarten Program.

2019 Progress: ****Save Our Sons of the Carolinas in Harmony Program/Partnership:**
The purpose of the Save Our Sons of the Carolinas in Harmony program is to consolidate and organize the community nonacademic functions offering a comprehensive array of character education based services and supports to improve student achievement. The Center provides Supportive Services by direct student and family intake assessments, community-based social services, academic interventions and support, counseling, referral services, behavioral health, etc. Students at risk –To increase academic outcomes, all students at an immediate risk of failure are assigned a save our sons on the Carolina in Harmony staff who will assess the student and identify the issues that impact his/her academic progress, exploring a variety of solutions, which will include additional supports for the young males & their family. This program is once a week on Monday nights for two hours. Program coordinators are Mike Myers and Michael Burton.

**** In partnership with UofSC, CHA provided youth and their parents with tickets and transportation to USC Women's basketball games.**

**** In partnership with Community Leaders and the Business Community CHA provided a weekly Lunch & Learn enrichment sessions. These sessions were held once a week, for 8 weeks, at lunch time for CHA youth that were participating in the Summer Youth employment program. The program concluded with a field trip to SCSU with a campus tour and the final graduation luncheon with a guest speaker, Dr. Prince from RSD#1.**

****In partnership with James E. Clyburn Research and Scholarship Foundation three CHA students submitted application and each one was awarded \$1,000 scholarships along with a Dell laptop computer. The ceremony was held the first weekend in August 2019.**

5. Objective: **Increase resident participation in the Resident's Executive Council by 50% by 2015.**

2015 Progress: Average attendance is 150 persons.

2016 Progress: There continues to be large crowds at the REC meetings; continues at 150.

2017 Progress: There continues to be large participation in the REC; new officers were elected in 2017 and attendance still continues to be over 150.

2018 Progress: Attendance at the monthly REC meetings range from 100 to 140 residents.

2019 Progress: Attendance at the monthly REC varied from 90 to 150 residents from numerous CHA communities.

**In September 2019 a new slate of officers were elected for a three year term.

VI. Goal: Promote self-sufficiency and asset development of families and individuals in assisted housing by providing access to services and economic development opportunities.

1. Objective: Increase participation in the FSS Program by 30 households.

2015 Progress: 9 residents signed new FSS Contracts

2016 Progress: 5 residents signed new FSS Contracts

2017 Progress: 9 residents signed new FSS Contracts

2018 Progress: 11 residents signed new FSS Contracts

2019 Progress: 12 residents signed new FSS Contracts

2. Objective: Increase education levels of 100 residents by 2020 through enrollment in GED, high school diploma and college programs.

2015 Progress: CHA continue to provide GED classes. The TRIO Program is housed in the agency's Cecil Tillis Center provides direct counseling for college enrollment for public housing and HCV participants. Scholarships are provided through the CHA's Golf tournament.

2016 Progress: Due to a decrease in federal funding, the TRIO Program was discontinued by the University of South Carolina in September 2016. The CHA hired their employee to work part time and she continues to provide information. Richland County provides funding for continuation of the GED Program.

2017 Progress: 18 residents enrolled in GED classes. 1 reported that they successfully passed the GED Exam.

2018 Progress: 15 residents enrolled in GED classes.

2019 Progress: There was no funding for the GED program from Richland County.

3. Objective: 200 residents increase their employment skills by 2020 by participating in job training programs.

2015 Progress: 47 residents participated in job training programs

2016 Progress: 40 residents participated in job training programs at CHA

2017 Progress: 39 residents participated in job training programs

2018 Progress: 10 enrolled in CPR, 3 in C.N.A. Class, and 30 residents participated in job training programs.

2019 Progress: 26 residents enrolled in the GRACE MAR Job development program. 11 graduated and received employment.

4. Objective: 120 youth will be connected to early learning academic programs.

2015 Progress: 43 Preschool children participated in Here Comes Kindergarten Program

2016 Progress: 61 Preschool children participated in Here Comes Kindergarten Programs. The CHA also started a healthy cooking school program in partnership with Edventure Museum.

2017 Progress: 45 Preschool children participate4d in Here Comes Kindergarten Program sponsored by Richland Library

2018 Progress: Continued the partnership with Richland County Library in sponsoring and bringing Here Comes Kindergarten to public housing communities. Seven youth participated in Richland County Public Library Story time.

2019 Progress: 10 youth participated in the Growing Readers Program.

5. Objective: Promote youth participation in programs that promote leadership, education, health, and mentoring.

2015 Progress: Developed MOBI-REC Program and implemented the healthy exercise/play program in all communities. CHA began healthy cooking classes in partnership with EdVenture Children's Museum in several locations.

2016 Progress: CHA became a Smoke –Free Public Authority on January 1, 2017. USC food share program moved into CHA Grocery Store.

2017 Progress: Youth were engaged in healthy lifestyle activates through the use of the Mobi-Rec Van. CHA continued partnering with Foodshare to provide affordable and accessible fresh produce for residents. Foodshare set up a distribution site in the Save-A-Lot Grocery Store. They received funding to start a healthy cooking program which will serve CHA residents and others in the community.

2018 Progress: Collaborated with local schools to create a Parent University to educate and empower parents and students on resources available in school. This effort promoted and developed closer relationships and the education system. Forty-five youth participated in the Zion Cannan Baptist Church after school tutoring program.

2019 Progress: CHA developed relationships with Midland Technical college, Fast-forward Digital learning Program, GRACE MAR Mentoring Program, and Richland One Adult Education Program,

6. Objective: Connect residents to programs and resources that promote healthy lifestyles and access to nutritional education programs.

2015 Progress: Raised funds and implemented the MOBI-REC Program and Partnered with USC for the food Share Program (getting food boxes to elderly and families). Conducted Healthy Food Classes in 4 of the largest housing communities (GG, ABC, Latimer, Hammond)

2016 Progress: CHA became a Smoke-Free Authority on January 1, 2017. CHA continues to work with public housing residents regarding smoking cessation programs.

2017 Progress: CHA continues to promote health awareness with residents through a number of activities. Residents were provided opportunities to obtain memberships from the Charles R. Drew Wellness Center. The Mobi-Rec Van goes out to communities daily to get kids out of the home and engaged in exercise and healthy play activities. Residents are connected with local clinics, federally qualified health centers, and other institutions that serve as medical homes or resources to provide primary health care.

2018 Progress: CHA continued engagement in healthy lifestyle activities through the use of the Mobile Rec Van. Residents were provided memberships to the Drew Wellness center for physical fitness and personal training.

2019 Progress: CHA had a series of workshop that addressed diabetes and facilitated various other health screenings to educate the residents on healthy lifestyles.

VII. Goal: Increase access to homeownership opportunities by providing education, counseling and resources for current CHA program participants and the community-at-large.

1. Objective: Provide home buying training for at least 1,000 individuals by 2020.

2015 Progress: 395 individuals attended home buying classes

2016 Progress: 499 individuals participated in home buying classes.

2017 Progress: 563 individuals participated in home buying classes in 2017

2018 Progress: 337 individuals attended home buying classes.

2019 Progress: 411 individuals attended home buying classes.

2. Objective: Increase the Housing Choice Voucher Homeownership Program by 30 participants by 2020.

2015 Progress: 4 Housing Choice Voucher participants purchased homes. 3 HCV no longer qualified for subsidy.

2016 Progress: 5 Housing Choice Voucher participants purchased homes in 2016. Currently 84 families are using vouchers to purchase homes.

2017 Progress: There were 8 HCV participants who purchased a home in 2017. There are currently 53 families who have purchased homes and are still receiving subsidies.

2018 Progress: 10 HCV participants purchased homes using the HCV Homeownership Program.

2019 Progress: 10 HCV participants purchased home using the HCV Homeownership Program. 7 HCV Homeownership participants no longer qualified for subsidy.

3. Objective: Promote homeownership to public housing families with incomes above 50% of the Area Median. Fifteen public housing families will purchase over the next 5 years.

2015 Progress: 1 Public Housing resident purchased a home.

2016 Progress: No public housing residents purchased a home in 2016.

2017 Progress: The CHA continues to encourage public housing residents to purchase homes. Although we did not have any public housing residents to report homeownership, they continue to be actively engaged in the home ownership education classes provided by CHA. Two of CHA's NSP/REO houses were sold to non-public housing families in 2017.

2018 Progress: Two public housing residents purchased homes in 2018.

2019 Progress: Columbia Housing continues to encourage public housing residents to purchase homes. Although only 1 public housing resident purchased a home in 2019, they continue to be actively engaged in the home ownership education classes provided by Columbia Housing.

VIII. Goal: Continue to develop and train a CHA staff that is professional in conducting business at the Authority, has excellent customer service skills, and is knowledgeable in HUD programs and regulations as well as all applicable laws.

1. Objective: Develop and implement a new Orientation Program for employees that introduce each new employee to all components of the agency.

2015 Progress: New Orientation Program has been developed for fulltime employees. No new fulltime employees were hired in 2015 but the program will be tried in 2016.

2016 Progress: CHA has used the new orientation program and continues to revise due to changes in the agency and new programs.

2017 Progress: With the turnover in staff during the last year, this resulted in IT conducting a lot of training classes on the HAB System and on HUD regulations.

2018 Progress: Employees were offered in-house training on the HAB information management system for new employees. In October, the HR Dept. provided training for new employees on how to log onto PEBA to access their accounts to manage benefits.

2019 Progress: Under the new leadership, analysis of employee training needs has been conducted and actions have been taking to engage employees in job specific training. CH has partnered with Midlands College with the Midlands TechHire program to employ certified IT professionals to assist with CH work, while gaining the needed on-the job experience. CH is currently looking into implementing partnership with local colleges/universities, including the University of South Carolina, Benedict College, Columbia College, etc., to employ work study students. Assisting the Census bureau with recruiting for more than 6000 jobs. The HR Director met with Goodwill recruiters to discuss possible partnership to employ senior citizens.

2. Objective: Require each employee to participate in a minimum of one training program during the calendar year based on a list of potential training topics developed during annual evaluations.

2015 Progress: All CHA staff participated in Active Shooter Training by Richland County Sheriff's Department (following San Bernardino shooting in California). 75 staff members participated in HUD mandated Pest Control Training (1-day class). Training logs were designed for each department. CHA will work on better documentation in 2016.

2016 Progress: All CHA staff participated in two Fair Housing Training Sessions conducted by HUD State Office. Additionally, 4 persons in Section 8 were sent to Nancy McKay training for certification. Four additional staff was sent to a Rent Calculation Class (one from each department: Occupancy, Section 8, Rent Calculation, and Public Housing). All Housing Management staff attended a Leadership Training. All CHA staff participated in Smoke-Free trainings.

2017 Progress: The majority of training in 2017 was a focus on HAB System.

2018 Progress: The CHA conducted an agency wide Sexual Harassment Training for all employees. The maintenance staff was required to attend Fair Housing Training for Maintenance. EIV/PIC training was held for employees with access to the system. Other trainings offered to employees were Flat Rent Guidance training, rent calculation, and working with clients with mental health issues training.

2019 Progress: Employee Engagement - Since December 2019, held two "Learning at Lunch" sessions – Legal Shield and AFLAC. National Job Shadowing Month February 2020

3. Objective: Utilize SERC and CCHRCO Training Workshops to obtain current information on HUD regulations; create agency training based on that information.

2015 Progress: Over 20 employees attended either SERC or CCHRCO training during the year.

2016 Progress: Employees attended CCHRCO. New Director of HCV and three new HCV staff members attended HCV Certification training. CHA inspectors all attended Update training. Five PH/ACV staff attended Rent Calculation training.

2017 Progress: There were not a lot of changes to the public housing program in 2017. As the Trump Administration gets more into program administration during the rest year, the CHA expects there will be more training opportunities.

2018 Progress: CHA sponsored staff to attend the SERC and CCHRO Training workshop.

2019 Progress: Procured Survey Monkey, a data collection tool to assist CH in electronically and more efficiently and expeditiously capture data from employees.

Developed personnel action document to document all personnel actions – implementation February 2020; developed employee personal change information form – implementation February 2020

4. Objective Conduct cross-training programs within departments to ensure succession plans are in place when employees leave or retire.

2015 Progress: Implemented HAB Training Program on a weekly basis to encourage more employees to strengthen knowledge of public housing. Entire agency attended (75 persons) HUD Pest Control Training. CHA has developed training in April, 2016 in conjunction with HUD staff on PIC Training and Fair Housing.

2016 Progress: CHA has begun cross training in several areas and is preparing for the retirement of several staff to occur in the next two years.

2017 Progress: The CHA begun to hire replacements for the TERI employees who will be leaving on June 29, 2018. CHA continues to cross- train employees.

2018 Progress: CHA experienced a major transition in workforce in 2018 as 12 employees retired during a 6-month period. Many of the positions left vacant were key leadership positions. CHA began a couple of months prior to the major wave of retirement to hire new and transition existing staff to the soon to be vacant positions. This was done to give the new employee and opportunity to obtain guidance and mentoring from the employees who were retiring.

2019 Progress: Developed employee evaluation document based on job duties, success criteria and performance characteristics for March/April 2020 implementation

5. Objective: Expand all HAB Training opportunities to ensure the CHA staff is using the computer system to the agency's full advantage. Continue offering suggestions to HAB to improve the operation of the software for CHA use.

2015 Progress: Weekly training classes provide hands on training entry in HAB system. This training is available for new employees and also for current management staff.

2016 Progress: Monthly training classes have continued in 2016. All new personnel are trained in a one on one setting. The CHA will go paperless for the procurement department in early 2017. CHA is conducting training in this area for the on-line procedures.

2017 Progress: Paid for four HAB (11/08/2017 morning and afternoon and 11/09/2017 morning and afternoon) for Section 8 Tenant move-in/move out/changes-rent charges. Public Housing move-in/move out/change unit – rent changes. And letter assistant training for both programs.

2018 Progress: W2 Training for HR was held on 12/12/2018 and additional HAB Training for newly hired staff during the course of the year.

2019 Progress: HAB is in a transition phase and updating their platforms to a different environment. Will gather input from managers on what training needs to be held via survey and work with HAB to understand their transition.

6. Objective: Continue to evaluate CHA staff and staff space needs. Consolidate departments to maximize supportive services and eliminate duplication of services.

2015 Progress: Continuing to evaluate space needs. CHA is in the middle of consolidating the Audit and Rent Calculation Departments into one department. All HCV and Public Housing folders will be reviewed by this new department

2016 Progress: With the addition of staff in the Section 8 department, some revisions to their offices occurred. The CHA is planning for some changes in space in 2017.

2017 Progress: This has been on-going since last spring.

2018 Progress: Upper management evaluated the need for space and made several office changes throughout the year.

2019 Progress:

IX. Goal: Create a more technologically strong agency to promote better program management and to create a more streamlined system for operations, while being environmentally conscious by reducing the use of paper.

1. Objective: Evaluate new document systems to move the CHA closer to a paperless office model.

2015 Progress: CHA has received proposals from several companies concerning a document system. Reviewing financing options as well as agency needs.

2016 Progress: CHA approved a proposal with Ricoh Inc. to use Docuware software, which is an Electronic Document Management Solution to become paperless. The first department to utilize the software will be the Procurement Department; the entire agency will be training in early 2017 on how to transact purchase order requests.

2017 Progress: Training sessions were conducted in 2017 with Ricoh and IT telephonically on a weekly basis. IT held training sessions with Procurement. EH CHA also created an option for vendors and/or contractors to send their invoices to an email address instead of mailing them. They were given the option of direct deposit instead of a paper check.

2018 Progress: Docuware requisition system is up and running. Trained new users and updated vendor and usernames.

2019 Progress: Assessment of the IT hardware and software systems has been conducted and a plan of actions has been established to transition to a cloud based work environment.

2. Objective: Explore the viability of using tenant emails for correspondence versus traditional mail to decrease costs, improve speed of correspondence response, and improve agency efficiency.

2015 Progress: Managers and HCV Staff have been obtaining email addresses for clients at Reexamination appointments. CHA did utilize email addresses for one mailing on a trial basis to notify clients of a job fair. CHA also requested email addresses for client responses for agency's first Project Based Voucher complex and utilized this method to contact clients for follow-up appointments.

2016 Progress: CHA opened two waiting lists in 2016 and used emails on future correspondents. CHA continues to update current residents' and vendors' emails.

2017 Progress: The CHA is now collecting resident emails, but needs to continue to explore using these addresses for contact purposes.

2018 Progress: HAB was purchased by MRI. MRI is working on a Tenant Assistance Portal to use email and internet to communicate letters, documents, and information to residents.

2019 Progress: Will need to open the discussion to get an updated scope of what is to be accomplished and deliver some suggestions.

3. Objective: Create an online Requisition/ Purchasing approval system to reduce lost documents and time handling paper requisitions.

2015 Progress: The Procurement Department will be the first department in the agency to become paperless using a new document system. Several different companies have been interviewed in 2015. We estimate implementation in fall, 2016.

2016 Progress: The Procurement Department will come on-line February, 2017.

2017 Progress; The accounting department and the Procurement department interact on several levels in the Docuware system. The implementation of Docuware has become a useful tool for both departments to access information concerning requisitions, purchase orders, invoices, and checks. Docuware also provides a useful tool for other departments that creates requisitions to track the approval process of the requisition and keep track of the progress it has or has not made.

2018 Progress: CHA continues to use the Docuware System to process purchasing invoices.

2019 Progress: The Docuware system is still be used and currently being scoped for physical drive expansion as the need increases. Planning to virtualize and cleanup vendor list. Also a discovery of moving this environment to a cloud based solution to understand the requirements and feasibility.

4. Objective: Create/maintain CHA website with information and forms for Tenants, Landlords, Applicants, Vendors and Employees to have access to information 24/7.

2015 Progress: CHA has created a Communications Committee composed of staff from each department. First task has been to redesign the CHA Website; one of the revisions has been to provide forms for HCV Program on-line. CHA has just begun to use this process and will evaluate during 2016. CHA will also use more Social Media in 2016.

2016 Progress: The CHA created a Twitter account and has used Facebook for special events. CHA will be hiring a new Communication Coordinator in 2017(already advertised).

2017 Progress: The CHA has greatly expanded its use of twitter and Instagram to disseminate information to employees and the public.

2018 Progress: CHA communications coordinator continued to use social media to connect to residents and the public.

2019 Progress: The Columbia Housing website has been updated and rebranded. The environment has been outsourced to a web focused development to ensure that the content remains secure and up to date.

5. Objective: Expand and upgrade 8 to 10 staff desktop computers over the next year to keep current with the new computer operating systems and hardware.

2015 Progress: 10 new desktop were installed in 2015.

2016 Progress: 8 new desktop computers were installed/replaced in 2016.

2017 Progress: Updated 5 computers for use with Docuware and updated/replaced 4 Window XP computers.

2018 Progress: IT updated/replaced 8 Windows XP computers.

2019 Progress: Began replacement of devices from legacy operating systems that are no longer under support to up to date platforms that will help secure the network.

6. Objective: Evaluate the current computer system servers and look to replace or retire older servers not supported by Microsoft. Evaluate and upgrade Microsoft programs over the year as needed.

2015 Progress: IT staff has been evaluating software during the last six months. CHA is currently looking at band needs to improve speed of internet access.

2016 Progress: Upgraded internet access speed from T1 to Fiber Internet access from Time Warner to increase internet speed.

2017 Progress: Expanded the storage capacity of the exchange server (Email server). (Tripled the storage space). Installed a new Docuware Server and installed a requisition document work flow system.

2018 Progress: Expanded storage capacity of the Docuware Server (expanded storage space).

2019 Progress: Began the discovery to move forward with complete system virtualization/server environment stabilization and the implementation of the cloud based solution Office 365.

7. Objective: Promote a “Go Green”, paperless initiative for community meetings, staff meetings and resident meetings by utilizing different computer software.

2015 Progress: CHA staff has begun using Word and internet for staff meetings.

2016 Progress: CHA staff has continued to use Word and internet for staff meetings.

2017 Progress: Installed a paperless requisition system that allows the processing of purchase requisitions without using pen and paper.

2018 Progress: Continue updating the paperless requisition system that allows the processing of purchase requisitions.

2019 Progress: Working with vendor to move to a virtual environment which will reduce the physical presence of hardware in the datacenter. Also, the scoping the implementation of O365 aligns with the “Go-green” initiative.

X. Goal: Improve communication with our clients, our employees, other government entities, and the public to further promote the message of the quality housing programs administrated by the CHA.

1. Objective: Publish a quarterly newsletter for public housing residents, Section 8 HCV participants, and non-HUD housing residents to better communicate resident activities, health information, empowerment programs, and job training.

2015 Progress: CHA has produced two newsletters in 2015.

2016 Progress: CHA published one newsletter. This will improve with the hiring of the new Communications Coordinator

2017 Progress: The new communications coordinator created a quarterly newsletter that was first sent out in October 2017. There will be more to come in 2018. The CHA submitted an award nomination to NAHRO for its new newsletter. The CHA also created a Government Update that was very well received by elected officials; two have been sent since July, 2017.

2018 Progress: The PR Coordinator used social media accounts to connect the public with CHA and inform them of various activities such as waiting list openings and community activities. CHA's PR Coordinator published newsletter quarterly for residents, government updates, and continued using social media to connect to the public.

2019 Progress: Columbia Housing hired a new Communications Director in February 2019. In September, the agency launched a new interactive website, www.columbiahousingsc.org to broadcast, distribute, and archive monthly newsletter. In addition to being able to distribute the newsletter through website eBlasts; it is also distributed via social media accounts –directly connecting to the public with important information about upcoming events and activities; waiting list openings and public policy issues that residents need to know about.

2. Objective: Improve communications with local government entities and their elected officials concerning CHA programs and development activities.

2015 Progress: The Executive Director made a report on the agency's activities to City Council and County Council in January 2016.

2016 Progress: The Executive Director made a report to County Council in March 2016. CHA continues to update local government on Gonzales Garden's Progress.

2017 Progress: The CHA hired a new communications coordinator and the first Government Update was created in August 2017. The second was printed in January 2018.

2018 Progress: The government updates were published quarterly. CHA also created social media accounts to keep the community aware of activities and programs.

2019 Progress: Columbia Housing has new executive leadership in its new Interim Executive Director Ivory Mathews and its new Chief Operations Officer Yvonda Bean. The installation of the new executive leadership team has provided a great opportunity to strengthen the working

relationship with Housing's City, County and State elected officials. Ongoing and regular dialogue between Columbia Housing's executive leadership team, the Mayor, City and County Council; and state elected officials have yielded many opportunities for our youth in 2019—to

include summer employment for 50 of our youth; a holiday toy give-away for 300+ children; and a health and wellness program for Columbia Housing staff.

3. Objective: Create a minimum of three media events per year utilizing print and television media; these events should illustrate to the public at large the positive activities of the CHA.

2015 Progress: CHA had 4 media events in 2015: Wall of Fame Ceremony; Shovel Ceremony for the 123 new apartments at Village at River's Edge phase 11: Announcement of the new MOBI-REC Recreational Truck; Announcement that HUD has approved Gonzales Gardens to be demolished by 2017.

2016 Progress: The CHA had five media events: Wall of Fame, Relocation of Gonzales Gardens residents, Demolition of West Avenue, Opening of the CHA Waiting List in May and in July 2017.

2017 Progress: The CHA had four media events: Gonzales Gardens open house, Gonzales Gardens Demolition ceremony, Allen Benedict- Court Christmas Party/ Bike Donation and the opening of the Waiting list.

2018 Progress: CHA has at least 3 media events in 2018. They include Wall of Fame, Father's Day event, Scholarship Gala, and Fall Festival.

2019 Progress: Columbia Housing held several media events in 2019. Three are highlighted here: In April 2019, Columbia Housing partnered with PRISMA Health for a community event *Health & Housing*. More than 500 people attended the Saturday event that provided free health screenings and medical exams-as needed-on the PRISMA Health Mobile Health Unit. A triage was also set up on-site to offer behavioral health screenings/assessments/sessions. Social Media, Radio, TV & Print Media covered the event

In August 2019, Columbia Housing partnered with the Columbia Police Department, the Columbia Fire Department and Alpha Media radio stations Hot 103.9, 93.9 to host a Block Party in celebration of National Night Out-- an annual community-building event intended to bolster community relationships with law enforcement. Social Media, Radio, TV & Print Media covered the event.

In November 2019 Interim Executive Director Ivory Mathews was invited by U. S. Senator Tim Scott (R)-SC to testify on Capitol Hill at a Congressional Hearing on Senate Bill 2160 requiring CO Alarms in Public Housing. Her testimony generated regional media coverage on Social Media, Radio, TV & Print Media.

All of these efforts –Columbia Housing's new interactive and engaging website; strengthened relationships with local, state and national policy-makers; and increased media presence on the local, state and national level--support and contribute to our efforts to create a culture of transparency and accountability at Columbia Housing.

XI. Goal: Ensure equal opportunity and affirmatively further fair housing for all people in the Midlands.

1. Objective: Continue affirmative measures to ensure access and to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, or disability.

2015 Progress: CHA continues to monitor all housing activities to ensure compliance with all Fair Housing Laws. CHA only had 2 complaints concerning housing submitted to State Human Affairs Commission and both complaints were ruled in favor of CHA. No further action was required. Participating in Fair Housing Fair in April 2016; now planning for event.

2016 Progress: Although there were several questions by HUD and State Human Affairs, there were no new complaints from either agency in 2016. The CHA received notification from HUD in March 2017 that its joint AFH (Assessment of Fair Housing) was approved and the CHA is now working on its Five Year Plan.

2017 Progress: The CHA completed, in partnership with Richland County Government, its first Assessment of Fair Housing. The Plan was submitted to HUD and approved in March 2017. The CHA is now working with Richland County to achieve the goals created by both agencies.

2018 Progress: CHA and Richland County staff convened to discuss a fair housing committee which will begin meeting in 2019 and reported on the Fair Housing activities addressed by both agencies. CHA did receive Fair Housing complaints in 2018 which are still under review.

2019 Progress: All fair housing complaints were found to be without cause from CHA.

2. Objective: Continue affirmative measures to ensure accessible housing to persons with all varieties of disabilities, regardless of unit size required.

2015 Progress: CHA has a Reasonable Accommodations Policy and is in full compliance with that policy, which is in compliance with HUD's regulations. Access to units is a major consideration in all development activities of the Authority.

2016 Progress: During 2016, the CHA conducted two training classes (3 hours each) regarding fair housing to ensure all staff is fully knowledgeable regarding the requirements of the law.

2017 Progress: The CHA continues to focus on building housing meeting disability needs. See progress above on the Plan submitted to HUD for its first Assessment of Fair Housing.

2018 Progress: The CHA continues to educate staff through training on fair housing laws. All maintenance staff was required to attend a Fair Housing for Maintenance webinar. Upon completion of the training, the team discussed various scenarios that could be violation of fair housing to ensure that staff understood the law.

2019 Progress: The CHA continues to ensure that staff are aware of Fair Housing laws and ADA requirements. Annual Fair Housing training is conducted to ensure that staff are properly trained on regulations.



MINUTES
Columbia Housing RAB Five Year Annual Plan Meeting
Noon on Wednesday, June 3, 2020

Columbia Housing's RAB held a five-year annual plan meeting on June 3, 2020 virtually via video conference.

The meeting was called to order at 1:01 pm by Interim Executive Director Ivory Mathews. Ms. Mathews introduced herself and her staff, and the following Columbia RAB members were present:

COLUMBIA RAB MEMBERS	Present	Absent
Thompsena Brown	X	
Secoya Tucker	X	
Geneva Dean	X	
Yolanda Sanderlin	X	
Catherine Hargrove	X	

CH STAFF	Present	Absent
Ivory Mathews, Interim Executive Director	X	
Yvonda Bean, Chief Operating Officer	X	
Taleshia Stewart, VP of Strategic Initiatives	X	
Cindi Herrera, VP of Project Development	X	
Lee McRoberts, Executive Assistant to Interim Executive Director	X	

DISCUSSIONS

Overview of Columbia Housing's Five Year Annual Plan: Mrs. Mathews thanked the Resident Advisory Board (RAB) for their participation and introduced staff to those present. Mrs. Mathews stated that the plan had been released for public review and comment earlier this year, normally a Public Hearing would be held to present the plan in March. Due to the current COVID-19 health crisis, public hearings could not be held this year and allowed housing authorities to hold their public hearings virtually, the Columbia Housing virtual Public Hearing will be held this Friday at noon and will be followed by a live question and answer session on Zoom and Facebook Live.

All feedback received from the RAB will be incorporated into the Annual Plan, the Annual Plan will be presented to the Columbia Housing Board in June for approval, once approved it will be submitted to HUD and staff can begin working on the goals within.

Mrs. Mathews turned the meeting over to Mrs. Yvonda Bean, Chief Operating Officer to present the Strategic Goals, Mrs. Bean thanked everyone for participating and began the presentation.

GOAL 1: Resident Strategies: Strengthen relationships with the people we serve by increasing mutual accountability and by improving our ability to connect them to vital services in the community that will foster economic self-sufficiency and quality of life opportunities.

- **Objective:** Establish a fully functional and independently operating Resident Executive Council.
 - Conduct leadership training for REC leaders.
 - Re-establish community club officers and engage them into leadership operations of the REC.
- **Objective:** Promote economic and self-sufficiency opportunities for residents served by Columbia Housing.

- Create workforce development opportunities where residents have access to jobs, job training, and career readiness services.
- Create work opportunities through Section 3 hiring initiatives and workforce development grants.
- Create initiatives to promote graduation and career planning for high school students.
- Provide opportunities for youth to receive work experience through summer employment and internship programs.
- Support education programs and initiatives by creating partnerships with institutions promoting literacy and connecting families to opportunities that will improve youth progress in schools and increase adult education levels.

GOAL 2: Housing Choice Voucher Program: Maximize leasing capacity based on annual budget authority. Maintain program compliance, in accordance with HUD regulations.

- **Objective:** Organize and improve administrative operations for the Housing Choice Voucher program that best support the needs of families served.
- **Objective:** Expand landlord participation through community outreach and engage existing landlords by creating educational opportunities about Columbia Housing's HCV program.

GOAL 3: Development and Capital Improvements: Support repositioning strategies of the existing portfolio through recapitalization, conversion, and preservation.

- **Objective:** Ensure that public housing residents are engaged in development planning and repositioning of assets.
- **Objective:** Engage in repositioning strategies that will reduce Columbia Housing's dependency on federally funded subsidies.

GOAL 4: Homeless Programs: Expand our collaborative partnerships with county and citywide efforts to reduce the families at risk of experiencing

- **Objective:** Reduce homelessness by providing supportive housing for individuals and families who are chronically homeless and disabled.
- **Objective:** Apply for funding to support Continuum of Care (CoC) and Housing Opportunities for People with AIDS (HOPWA) Programs.
 - Submit applications annually to support CoC and HOPWA Programs
 - Manage operations and budget expenditures to maximize program implementation.

GOAL 5: Homeownership: Create opportunities for residents and program participants, through the coordination of homebuyer education, resources and activities that increase homeownership opportunities.

- **Objective:** Increase access to homeownership opportunities by providing education, counseling, and resources for current Columbia Housing program participants and the community-at-large.

- **Objective:** Affirmatively further fair housing by ensuring that all operations within the Columbia Housing adhere to Fair Housing regulations.

GOAL 6: Human Resources and Personnel Development: Embrace the agency's new identity by transforming its organizational structure and culture, through the establishment of a track record for integrity, accountability, collaboration, and exceptional customer service,

- **Objective:** Improve human resources functions by creating electronic based personnel management system.
- **Objective:** Implement strategies to improve personnel capacity and ensure that supervisors and employees are properly trained on their job responsibilities.

GOAL 7: Community Safety and Security: Develop a comprehensive strategy through the engagement of Columbia Housing's communities and law enforcement agencies that can improve public safety and the quality of life within its communities.

- **Objective:** Increase capacity of the security staff by developing internal resources to support strategies that will address criminal activity in communities while providing resources and support and partnering with Columbia Police Department and Richland County Sheriff's Department in crime fighting efforts.
- **Objective:** Implement community crime prevention programs that will reduce criminal activities and engage residents as core planners and facilitators of crime fighting strategies.

GOAL 8: IT Operations: Innovate the way Columbia Housing maintains a smooth functioning of its infrastructure and operational environments that support application deployment to its internal and external customers.

- **Objective:** Upgrade phone system infrastructure to host Voice Over IP enhancing the way we connect with our audiences.
- **Objective:** Increase connectivity and narrow the digital divide throughout our communities by partnering to install the broadband infrastructure.

GOAL 9: Violence Against Women: Enforce and protect the rights of victims of domestic violence, dating violence, and stalking to secure and maintain housing without being victimized a second time by being denied housing or losing housing because of the criminally violent act perpetrated against them.

GOAL 10: Communications and Community Engagement: Build support for housing as a key component of vibrant, sustainable communities through the communication of public information, engagement and advocacy that promotes affordable housing and supports the advancement of low wealth individuals and families.

- **Objective:** Use social media and website platform to bring awareness and transparent communications of Columbia Housing's community activities, business opportunities, and administrative changes.

- **Objective:** Enhance website features through the expansion of business portals for applicants, residents, staff, landlords, and Board of Commissioners.

GOAL 11: Public Housing: Develop and implement repositioning strategies for all public housing properties. Maintain program compliance, in accordance with HUD regulations.

- **Objective:** Organize and improve administrative operations for the Public Housing program that best support the needs of families served.
- **Objective:** Refine management strategies that will ensure Columbia Housing is operating in accordance with HUD's housing standards by providing quality and stable housing conditions.

Ms. Bean stated she concluded the operational goals and turned the meeting over to Ms. Herrera to discuss the development goals for Columbia Housing.

Ms. Herrera introduced herself and stated she would discuss repositioning the Public Housing assets of Columbia Housing. There is currently a \$60 billion dollar deficit in unmet Capital needs in public housing units across the country, that deficit is currently growing at \$3.5 billion per year. HUD is working with housing authorities to reposition current assets in ways that allow them to leverage private funding to address the unmet needs.

There are 4 ways housing authorities can accomplish the repositioning goal; mixed finance (former HOPE VI and Choice Neighborhoods Initiatives programs) – these programs are no longer in existence and no longer viable, Rental Assistance Demonstration (RAD), Section 18 and Voluntary Conversion.

The RAD program was started in 2012 and since its inception over 500,000 units of public housing have been converted and raised over \$6 billion dollars in private capital. The program provides stable funding and allows housing authorities to access private funding to recapitalize properties as needed by converting units to project based housing choice vouchers with 20-year contracts. Rents under the RAD program would be calculated the same way as in the public housing program at 30% of the tenant's income, ceiling and maximum rents would be eliminated. Tenants asked to move during a RAD conversion because of demolition or disposition would be offered a tenant protection voucher and the right to return to the rehabilitated project without being rescreened.

The Section 18 program is designed to facilitate the demolition or disposition of public housing property. Under Section 18 a property may be dispositioned if the housing authority can demonstrate to HUD that the property will be more efficient as a project-based voucher property versus public housing. Smaller housing authorities can also utilize Section 18 if it is deemed in the best interests of the residents to do so.

Voluntary conversion is typically used by housing authorities with less than 250 units; tenants receive tenant protection vouchers and may utilize them at their existing property or taken to the private market.

Columbia Housing currently owns 1684 units of public housing; 1329 units of family housing and 355 units of senior and disabled housing. After reviewing the current portfolio, it has been determined that 637 units require demolition or disposition, 659 units require rehabilitation and 388 units require little or no work.

Using Section 18, Columbia Housing plans to demolish or disposition 637 units including Latimer Manor, the Reserves, Marion St, Oak Read and a number of scattered sites. Under Voluntary Conversion and with less than 250 units, Columbia Housing plans to convert Dorrah Randall, Lewis Scott Court and River's Edge. Under RAD, Columbia Housing will reposition Hammond Village, Arrington Manor and 223 scattered sites. A total of 598 units will be converted to RAD when the process is complete. A comprehensive needs assessment will be completed on each property prior to conversion and input will be sought from residents and the public.

Mrs. Mathews thanked Mrs. Bean and Mrs. Herrera and opened the floor to questions.

Question 1: (Thompsonsena Brown) Does plan presented include tenant now or can new tenants apply for new units when they are complete?

Answer: (Cinid Herrera) Property specific waiting lists will still be in place. Waiting lists for specific properties can be opened as needed and staff will work with residents that may be technology challenged.

Question 2: (Thompsonsena Brown) Do work orders need to be submitted for rehab work?

Answer: (Yvonda Bean) Any maintenance issues or needs should be called in as usual. Work identified during the needs assessment will be performed separately.

Question 3: (Hargrove) How are handicapped spaces allocated at properties?

Answer: (Yvonda Bean) The ADA specifies that there be a matching number of ADA parking spots to coincide with the number of ADA compliant units in a complex. If there are specific concerns within a property they should be addressed by the property manager.

Question 4: (Hargrove) What is the status of demolition at Allen Benedict Court?

Answer: (Cindi Herrera) The CH Board awarded the contract for demolition at their May meeting. Movement on the site should begin soon. CH is also working with the Columbia Fire Department to coordinate training activities on the site in July.

Question 5: (Dean) Is Arrington Manor going to be dispositioned or demolished? There is concern about mold, rust and water damage.

Answer: (Herrera) A comprehensive needs assessment is scheduled for Arrington Manor later this summer and more will be known at that time.

Question 6: (Dean) When family size changes, what is the process to transfer into a unit that suits their needs?

Answer: (Bean & Mathews) Tenants are recertified annually and family composition is examined at that time. If a change in family composition happens outside the recertification period, the tenant may report their change to property management to initiate the process.

Question 7: (Dean) How long does the described transfer process take?

Answer: (Bean) The transfer process varies on the availability of units and can take longer if an appropriate unit is not available. Mrs. Mathews added that policies will be implemented soon to ensure families are housed in the appropriately sized units and if appropriate sized units are not available, they will be issued a voucher.

ADJOURNMENT

There being no further business the meeting was adjourned at 1:55 pm.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

RESOLUTION 2020-23: **Approval of the Housing Authority of the City of Columbia's (Columbia Housing) Agency Annual & 5-Year Plan for Fiscal Years 2020 - 2024**

BACKGROUND

Pursuant to the Section 511 of the Quality Housing and Work Responsibility Act of 1998 and 1999 HUD Appropriations Act, all Public Housing Authorities must adopt and submit to the United States Department of Housing and Urban Development (HUD), a 5-Year and Annual Plan (Agency Plan) effecting overall operations, management and mission of the federally funded Housing Programs.

RESOLUTION

WHEREAS, federal regulations require the 5-Year and Annual Plan be made for public comment; that a public hearing be conducted and that the authority solicit input from the Resident Advisory Board; and

WHEREAS, Public Advertisement of the 45 Day Comment Period was posted on our website; and,

WHEREAS, a virtual public hearing meeting was held at 12:00 pm on June 5, 2020 via zoom which had over 1215 views and a number of public comments; and

WHEREAS, a virtual Resident Advisory and Resident Executive Council meeting was held at 1:00 pm on June 3, 2020; and

WHEREAS, the authority prepared the Annual and 5-Year Agency Plan for Fiscal Years 2020 through 2024 in accordance with CFR 24 903.6;

NOW THEREFORE, BE IT FURTHER RESOLVED by the Board of Commissioners of the Housing Authority of the City of Columbia, SC that it authorizes the Executive Director to properly submit such plan to the United States Department of Housing and Urban Development and to take any and all such necessary administrative actions to implement this resolution.

This 18th day of June, 2020

**BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF
COLUMBIA, SC**

BY: _____


Ernest W. Cromartie, III, Chairman

Questions and Answers from Presentation of Columbia Housing Annual Plan

Friday, June 5, 2020

Question 1: What is status of Demolition at Allen Benedict Court?

Answer: The demolition contract has been awarded and staff expects the first work to begin on the site at the end of this month with a fence being placed around the perimeter first. The Columbia Fire Department has plans to use the site for training exercises in July. Actual demolition should begin in mid-August of this year with the site being completely cleared, graded and seeded by the end of the year.

Question 2: Why did Mrs. Mathews decide to capture the history of Allen Benedict Court with the "Allen Benedict Court: Forever in my Heart" campaign?

Answer: Mrs. Mathews stated that she understands the importance of the property to many people within the community and wanted to honor that history by capturing the good memories people have of the site.

Question 3: What opportunities under Goal 5 exist for women and minority contractors?

Answer: Business opportunities are posted on the website whenever available and the site acts as a portal for companies seeking to do business with CH. Per HUD regulations, all contracts require a minimum 30% participation from minority and women owned businesses, each general contractor must meet that requirement.

Question 4: Explain the CH Procurement Process?

Answer: All business opportunities are placed in a dedicated area on the CH website called "Business Opportunities". Those listings include all relevant information for the service/good being requested with appropriate contractor requirements, forms and due dates. Prior to the bidding of each project, a meeting is held to discuss the specifications and to address any additional questions. Bids are submitted on the due date, responses reviewed by committee and the contract is presented to Board for approval if needed based on cost. Mrs. Mathews also encouraged everyone to sign up for news on the website as opportunities are communicated via eblast.

Question 5: There have been documented cases in other cities of landlords violating tenant rights after a RAD conversion. What measures will CH take to ensure proper oversight is maintained post-conversion?

Answer: Tenant rights are an important part of RAD conversion; many protections are built into the process itself. No private landlords will be involved as CH will maintain ownership of the properties under a non-profit entity. Current leadership has extensive RAD conversion experience and is committed to providing the best service possible to those impacted.

Question 6: What is Mrs. Mathews email address:

Answer: imathews@columbiahousing.org

Question 7: How do you assemble the right team(s) to meet the stated goals?

Answer: Staffing is currently being transformed to ensure needs are met going forward. Senior leadership is being thoughtful and strategic about putting together a diverse, accomplished group. Communication is critical to staff informed and empowered and the Board of Commissioners provide input and leadership via the Committee system all while keeping residents first.

Question 8: Mrs. Mathews, you stepped in at Columbia Housing during a challenging time, how do you typically meet challenges?

Answer: Mrs. Mathews stated that she did not see the situation as challenging but rather as an opportunity to be better housers by listening to resident and the community.

Question 9: Can you tell us a little bit about Columbia Housing's current property inventory?

Answer: There are currently 1684 units of public housing owned by CH. There are also 8 additional properties that CH owns that are market rate units. CH wants to expand its privately held portfolio of properties in order to make finding units easier for tenant with vouchers. CH operates the largest HCV program in the state with over 4000 vouchers currently being administered.

Question 10: Do you plan to increase senior housing?

Answer: There is a 95-unit senior building planned for the old Gonzales Gardens site. The newly redeveloped community will be called The Oaks at St. Anna's Park. The new senior property will be state of the art and will include a community space, computer lab and exercise room and will be available to individuals 62 and older.

Question 11: What resources are available to residents that might be experiencing domestic violence during the pandemic?

Answer: Sistercare has always been a strong partner and can respond quickly if needed. CH has partnered with Sistercare over the years to provide services to residents in need. Sistercare is able to provide access to a variety of services through their organization. Within CH, a resident experiencing domestic violence can be transferred to a new location and their identity protected.

Question 12: There weren't programs available for personal development when I was a resident? How can I or others participate in bringing that kind of information to current residents?

Answer: CH has a Resident Executive Council that meets monthly to discuss resident needs, Mrs. Mathews attends the meetings and communicates with the officers on a regular basis. A new Senior Vice President of Resident and Family Services, Talleria Jackson, has recently been hired and will be doing things to increase meaningful activities for residents. Mrs. Jackson's staff and department will assist residents with making and achieving self-sufficiency goals, aging in place plans and service coordination with local providers to ensure residents have access to a variety of programs.

Question 13: Is the way people are treated, the way you can apply and the ability to reach a person being addressed?

Answer: Customer service is being addressed at all levels within the organization. Technology issues that create barriers to easy interaction are being corrected. In the reorganized agency, a Customer Service team will be in place to ensure callers reach a person and that concerns are addressed within 24 hours.

Question 14: There is a stigma attached to families with vouchers, in the past people have been directed to contact the landlord if a problem existed with a voucher holder. Has that changed and who will be monitoring properties to ensure proper upkeep?

Answer: CH certifies a family's qualifications to participate in the Housing Choice Voucher program. Once a family has been issued a Housing Choice Voucher, they may take that voucher into the private market and rent from any landlord that will honor the voucher. The landlord is responsible for tenant selection and background checks, if a landlord determines that their tenant is violating their lease they should notify CH immediately as a lease violation may also be a program violation that could result in the loss of assistance for the tenant. As CH does not want to see anyone evicted, they will work with the client and landlord to resolve potential issues.

Question 15: Is CH working with the Lyons Street Neighborhood Association regarding the redevelopment of the old Gonzales Gardens site?

Answer: Staff has been in ongoing discussions with the Lyons Street NA, a presentation was made to their group prior to the COVID-19 crisis where important feedback was gained that was worked into the new site plan. Staff will continue to meet with the Neighborhood Association as work on the site progresses.

Question 16: Is there an announcement regarding the redevelopment of Allen Benedict Court?

Answer: A solicitation will be issued soon for a development partner. They will help drive the community engagement process and input will be sought from former residents, community stakeholders and others. Staff expects to have a development partner identified by end of the summer or early fall.

Question 17: When will the community input process begin for Allen Benedict Court?

Answer: Late fall of this year with the bulk of activities probably occurring in the 1st or 2nd quarters of 2021.

Question 18: With local VA offices closed, can veterans apply directly to CH?

Answer: Veteran's wishing to participate in the Veteran's Assisted Supportive Housing (VASH) program may only apply through the VA. CH serves approximately 400 families within this program.

Question 19: What are the criteria for becoming a development partner at Allen Benedict Court?

Answer: When the solicitation is published, it will include a clear set of criteria for potential respondents. The ability to help raise funds for the project through the private market will be a part of the required criteria as CH has no funding to complete the work.

#####

**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 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Teresa Wilson, the City Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Columbia, SC
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

City of Columbia, SC
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Annual and 5-Year Plans for Columbia Housing establish strategies that the authority will be undertaking to expand opportunities to provide quality affordable housing for citizens of the City of Columbia, SC and reposition its current portfolio of housing. The plan addresses implementation of management practices to ensure Fair Housing for all citizens, promote homeownership, create affordable housing for low income households and homeless families, and provide economic stability opportunities for the most vulnerable citizens of Columbia.

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

Teresa Wilson

Title

City Manager

Signature



Date

6/18/2020

**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 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Leonardo Brown, the County Administrator
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Columbia, SC
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of

Impediments (AI) to Fair Housing Choice of the

Richland County, Columbia, SC
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

The Annual and 5-Year Plans for Columbia Housing establish strategies that the authority will be undertaking to expand opportunities to provide quality affordable housing for citizens of Richland County and reposition its current portfolio of housing. The plan addresses implementation of management practices to ensure Fair Housing for all citizens, promote homeownership, create affordable housing for low income households and homeless families, and provide economic stability opportunities for the most vulnerable citizens of Richland County.

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

Leonardo Brown

Signature



Title

County Administrator

Date



Certification for a Drug-Free Workplace

U.S. Department of Housing
and Urban Development

Applicant Name

Housing Authority of the City of Columbia, SC
~~Housing Authority of the City of Columbia, SC~~
Program/Activity Receiving Federal Grant Funding

Public Housing Operations, HCV, Capital Fund, ROSS, FSS Grant, CoC, HOPWA

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

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
Ivory N. Mathews

Title
Executive Director/CEO

Signature

X Ivory N. Mathews

Digitally signed by Ivory N. Mathews
DN: cn=Ivory N. Mathews, o=Columbia Housing, ou,
email=imathews@columbiashousing.org, c=US
Date: 2020.07.08 11:26:16 -0400

Date

07.08.2020

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Housing Authority of the City of Columbia, SC

Program/Activity Receiving Federal Grant Funding

Public Housing Operating, Capital Funds, HCV (FY 2020-2021 Annual Plan)

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

Ivory N. Mathews

Title

Executive Director/CEO

Signature

Ivory N. Mathews

Digitally signed by Ivory N. Mathews
DN: cn=Ivory N. Mathews, o=Columbia Housing, ou,
email=imathe@columbiahousing.org, c=US
Date: 2020.07.08 11:22:52 -04'00'

Date (mm/dd/yyyy)

07.08.2020

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input checked="checked" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> b. a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="checked" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Columbia Housing 1917 Harden Street Columbia, South Carolina 29204 Congressional District, if known: SC6			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency: US Department of Housing and Urban Development			7. Federal Program Name/Description: PHA 5-Year and Annual Plan CFDA Number, if applicable: _____		
8. Federal Action Number, if known:			9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): N/A			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): N/A		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Ivory N. Mathews</u> <small>Digitally signed by Ivory N. Mathews DN: cn=Ivory N. Mathews, o=Columbia Housing, ou, email=imathews@columbiahousing.org, c=US Date: 2020.07.08 11:24:30 -0400</small> Print Name: <u>Ivory N Mathews</u> Title: <u>Executive Director/CEO</u> Telephone No.: <u>803.254.3886 ext 206</u> Date: <u>07.08.2020</u>		
Federal Use Only:				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

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 02/29/2016

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 Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the 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, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

Housing Authority of the City of Columbia, SC

SC002

PHA Name

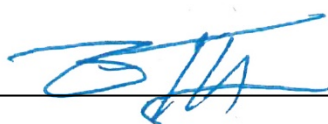
PHA Number/HA Code

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 Ernest Cromartie III

Title Chairman of the Board of Commissioners

Signature



Date 06/24/2020

Certifications of Compliance with PHA Plans and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 02/29/2016
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**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the x 5-Year and/or x Annual PHA Plan for the PHA fiscal year beginning 07/01/2020 , hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

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


Housing Authority of the City of Columbia, SC
PHA Name

SC002
PHA Number/HA Code

x Annual PHA Plan for Fiscal Year 2020

x 5-Year PHA Plan for Fiscal Years 2020 - 2024

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	Title
Ernest Cromartie III	Chairman of the Board of Commissioners
Signature 	Date 6/24/2020

Housing Authority of the City of Columbia, SC

PH Annual Plan (2020-2021)

5-Year Plan (2020-2024)

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Demolition/Disposition

DEMOLITION/DISPOSTION/CONVERSION UNDER RAD/TBV OR PBV

Columbia Housing has completed a preliminary analysis of its entire real estate portfolio and has determined that it is in the best interest of the residents we serve to reposition all Public Housing properties and exit the Public Housing Program. During the Plan Year, CH will begin its repositioning strategy which will include the use of various tools made available by HUD as described below.

Rental Assistance Demonstration (RAD) Program

See Exhibit A for the details related to the RAD Program.

Section 18 Demolition and Disposition

Obsolescence. This tool will apply to properties that have current capital needs in excess of 57.14% of HUD's Total Development Cost (TDC) limits for non-elevator buildings and 60% for elevator buildings.

Scattered Sites (defined as 4 or fewer units on non-contiguous sites). HUD allows a PHA to remove scattered site units that are operationally unsustainable.

RAD/Section 18 Blend. A PHA can, as part of a RAD transaction, substitute 25% of the RAD units for Section 18 as long as the PHA is doing rehab in excess of 60% of the Housing Construction Costs (HCC) as published by HUD and as long as the PHA is not receiving 9% credits.

Efficient and Effective. Under this final criterion, any PHA can decide to remove any units from public housing, without any test of obsolescence, if the PHA can demonstrate to HUD that the "replacement units" (which could include rehab) are more "efficient and effective" than what is being replaced.

Streamlined Voluntary Conversion (SVC) program

When the Public Housing portfolio reaches less than 250 units, the remaining units will exit the Public Housing Program through Voluntary Conversion.

The chart below identifies which properties are anticipated to be repositioned under which of the above tools.

REPOSITIONING TOOL	PROPERTY	REPOSITIONING TOOL	PROPERTY
RAD CONVERSION 321 UNITS	Archie Drive	RAD/SECTION 18 75/25 176 UNITS	Arrington Manor
	Arsenal Hall		Hammond Village
	Atlas Road		Rosewood
	Congaree Vista	SECTION 18 OBSOLECENSE 612 UNITS	Marion Street Highrise
	The Corners		Latimer Manor
	Elderly Cottages		Reserves at Faraway
	Fair Street		Columbia Place
	Fontaine Place		Oak Reed
	Greenfield	SECTION 18 SCATTERED SITES 350 UNITS	All Single-Family Homes
	Overbrook and Thornwell		
	Pine Forest		
	Pinewood Terrace	VOLUNTARY CONVERSION 183 UNITS	Dorrah Randall
	Rosewood Hills		Lewis Eastover
	Waverly Apartments		Rivers Edge
	Wheeler	1642	TOTAL UNITS

UNITS WITH APPROVED VACANCIES UNDERGOING MODERNIZATION

Units with approved vacancies undergoing modernization include the Marion Street Highrise and various single-family homes. However, these units will be returned to inventory when it is determined that the units cannot be modernized, and a disposition or demolition strategy had been developed.

PROJECT BASED VOUCHERS

During the Plan Year, Columbia Housing will develop and implement a Project Based Voucher Program to assist in the repositioning strategies described above. Project Based Vouchers will also be used for the redevelopment of Gonzales Gardens and Allen Benedict Court and for any other redevelopment of Public Housing.

In addition, Columbia Housing anticipates issuance of a solicitation for a limited number of Project Based Vouchers to be determined for privately owned properties to support relocation efforts that will be necessary to implement the repositioning strategies.



COLUMBIA HOUSING

1917 Harden Street

Columbia, SC 29201

803.254.3886

www.columbiahousing.org

SUPPORTING DOCUMENTS

Policies Governing Eligibility, Selection, Admission and Deconcentration Analysis

This section details the policies and procedures that govern admissions and selection into the public housing and HCV Programs. The ACOP and Admin Plans provide specific details on housing operations and admissions.

Subcomponent A:

Section 1: Determining Eligibility

There are five eligibility requirements for admission to the Public Housing program and they are as follows: must qualify as a family, have an income within the current income limits, must meet citizenship/eligible immigrant criteria, must provide documentation of Social Security numbers, and must sign all required Columbia Housing Authority documents. In addition to the eligibility criteria, families must also meet the Columbia Housing Authority screening criteria in order to be admitted to public housing.

Section 2: Organization of the Waiting List

The waiting list will be maintained in accordance with the following guidelines:

- A. The application will be in each file and be retained in accordance with CH's document retention policy.
- B. All applications will be maintained in order of bedroom size, category preferences, and then in order of date and time of application; and
- C. Any written contacts or formal meetings between the Columbia Housing Authority and the applicant will be documented in the applicant files.

Section 3: Assignment of Units

In offering housing assistance in Public Housing, the applicant will be selected in the following order:

- a. By category selected by the applicant.
- b. By bedroom size and type of unit.
- c. By applicants with the earliest application date and time who qualify for a preference.

- d. By applicants with the earliest date and time who do not qualify for a preference.
- e. Deconcentration.

APPLICANT SELECTION AND ASSIGNMENT

1. Records will be maintained in the applicant folders on all offers, acceptances and refusals, to include location, date and time, the circumstances of each offer and rejections, and other information considered pertinent.
3. When housing is available for new residents, the appropriate staff person will request eligible applicant files to consider for housing assistance.
4. After receiving the request, the Applications Department selects the next eligible file, according to the procedures outlined under "Method By Which Applicants will be Chosen from the Waiting List and Offered Available Housing Assistance".
5. After receiving the application, the appropriate staff person will contact the applicant by phone and follow this with a letter setting up an appointment to show the vacant unit. Every effort will be made to contact the applicant.
6. If the applicant accepts the housing offer it will be noted on the contact sheet located in the applicant's file, which unit was offered and accepted with the date of the acceptance.
7. If the applicant refuses the offer of housing assistance, the staff person will document the contact sheet of the applicant's file stating the unit offered by CH and refused by the applicant, along with the reason given by the applicant for the refusal of a category selected by the applicant. The file will be promptly returned to the Application's Department.
8. Refusal of an offer of housing will be reviewed by the Applications Department. If none of the conditions considered a valid reason for refusal, as set forth in this policy are present, the application will be removed from the Waiting List.

The Columbia Housing Authority shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income. To ensure this requirement is met we shall quarterly monitor the incomes of newly admitted families and the incomes of the families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, we will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

Section 4: Admissions Preferences

The Columbia Housing Authority will select families based on the following preferences within each bedroom size category:

Public Housing Preferences

- a. Displaced person(s): Individuals or families displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal Disaster Relief Laws.
- b. All other applicants.

Exceptions for Special Admissions

If HUD awards the Columbia Housing Authority program funding that is targeted for specifically named families, the Columbia Housing Authority will admit these families under this procedure.

Section 5: Occupancy Policies

The Occupancy Policies are included in the ACOP (see Attachment 1).

Section 6: Deconcentration and Income Mixing

HUD requires housing authorities to create a policy to promote deconcentration of poverty and income mixing in its ‘covered’ developments and to affirmatively further fair housing in the Authority’s admissions policies in accordance with HUD regulations.

It is Columbia Housing Authority's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income communities and lower income families into higher income communities. Toward this end, we may skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The Columbia Housing Authority will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our communities, the income levels of census tracts in which our communities are

located, and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement. This information is available in the Columbia Housing Authority's Deconcentration of Poverty Plan.

Deconcentration Incentive in Public Housing

The Columbia Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular community.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

Deconcentration of Poverty Determination Factor

The first step is to determine what the average income is for each AMP (considered an Asset Management Project or development). The average income for the 5 AMPs at the Columbia Housing Authority are as follows:

AMP	Average Income
AMP 1	\$11,299
AMP 2	\$19,286
AMP 3	\$13,608
AMP 4	\$13,543
AMP 5	\$13,837

Then agency wide average household Income is \$14,314.60.

The next step is to then determine what is 85% of the average and 115% of the average. 85% of income would be \$12,167.41 and 115% is \$16,461.79. All properties should have an average income that falls between 85% and 115% of the average. By using this method, the appropriate action is taken to ensure that tenancy folders routed to communities for lease up are representative of all levels of income and there are no discrepancies involving income steering.

Developments	Average Income
AMP 1	\$11,299
AMP 2	\$19,286
AMP 3	\$13,608
AMP 4	\$13,543
AMP 5	\$13,837

Total Average Household Income

\$14,314.00

85% of total average

115% of total average

\$12,167.41

\$16,461.79

Indicated in the chart above, all AMPs are between the 85% and 115% with the exception of AMP 1 below 85% and AMP 2 which is currently above 115%.

Deconcentration Policy for Covered Developments			
Development Name	Number of Units	Explanation (if any) {step 4 at 24 CFR 903.2©(1)(iv)}	Deconcentration policy (if no explanation) {see step 5 at 24 CFR 903.2©(1)(v)}
AMP 1	151	AMP 1 is less than 85% of average. This AMP is primarily comprised of housing for elderly and near elderly populations. The income of such group is limited due to fixed benefits such as Social Security.	See Policy
AMP 2	196	AMP 2 is greater than 115% of average. This AMP consists primarily of family housing single.	See Policy
AMP 3		Average within range	See Policy
AMP 4		Average within range	See Policy
AMP 5		Average within range	See Policy

Subcomponent B: Section 8 Admin

The complete policies on eligibility determination, waiting list organization, search time, admissions, and preferences and special purposes for the Housing Choice Voucher Program are included under Attachment 2. On February 20, 2020, the Columbia Housing Board of Commissioners voted to approve the following changes to the Admin Plan.

Changes to Housing Choice Voucher Admin Plan

Local Preferences: Three local preferences were established. Tenants displaced as a result of Public Housing demolition or disposition. Families that are over-housed or underhoused in Public Housing where there are no appropriate size units for the family; and Families displaced by government action.

2. Waiting List: Clarification on when the waiting list is open, the Columbia Housing will utilize a random lottery to select a predetermined number of registrants that will be placed on the waiting list to keep the program at maximum utilization for the next twelve-month period.
3. Homeownership: Clarified that homeownership subsidy will be paid directly to the mortgage holder and not to the family. We have had several recent delinquent mortgages and a couple have proceeded to foreclosure because homeowners were not passing the subsidy on to the mortgage holder.
4. Project Based Vouchers: Added a Project Based Voucher chapter in the Administrative Plan that correctly addresses all of the HUD requirements for administration of a PBV Program. We have included all the HUD provisions to award PBV contracts to properties owned by Columbia Housing or an affiliate to facilitate the repositioning of our public housing communities.
5. Overall Updates: Incorporated all of the HUD updates since 2016 including the Streamlining Administrative Regulations Notice; the new Portability Notice; and all provisions of the HOTMA legislation including inspections and recertification.

Housing Choice Voucher Preferences

- a. Tenants displaced as a result of Public Housing demolition or disposition
- b. Families that are over-housed or underhoused in Public Housing where there are no appropriate size units for the family.
- c. Families displaced by government action.

Eligibility Determination

CHA will accept applications only from families whose head or spouse is at least 18 years of age or an emancipated minor. To be eligible for participation in the Housing Choice Voucher Program, an applicant must meet the following criteria established by HUD:

- An applicant must be a “family”
- An applicant’ annual gross income must be within the applicable Income Limits at the time that the determination of eligibility is rendered by the Housing Authority.
- An applicant must furnish Social Security Numbers for all family members.
- An applicant must furnish declaration of Citizenship or Eligible Immigrant Status and at least one member of the applicant family must be either a U.S. citizen or have eligible immigration status.

Waiting List Organization

CHA will only accept electronic applications via the on-line web-app. CHA will partner with the Richland County Library system and other Community Service partners to assure that all individuals interested in applying for housing assistance have computer access to file electronic applications. CHA will provide assistance for individuals with special needs at its Resident Service computer centers. The application process will consist of a two-step process: the on-line web-based application and the full application. The on-line application will request only information needed for placement on the waiting list. Applicants will be placed on the waiting list based solely on the information provided in the electronic application form. The full application will be completed when an applicant is selected from the waiting list. A random lottery will be completed for all applications received via the on-line application system. Applicants will be ranked in order on the waiting list from lowest to highest lottery number.

Search Time

New Admissions – During the briefing session, each household will be issued a voucher, which represents a contractual agreement between CHA and the Family, specifying the rights and responsibilities of each party. It does not constitute admission to the program, and the family remains an applicant, until such time that a lease and contract become effective.

The voucher is valid for a period of ninety calendar days from the date of issuance. The family must submit a Request for Tenancy Approval (RFTA) within the ninety-day period or request an extension in accordance with the extension provisions outlined below. If the Voucher has expired, and has not been extended, the family will not receive assistance and will be removed from the waiting list. The family will not be entitled to a review or hearing.

Admissions

Families will be selected from the waiting list in order based on the preference points and lottery numbers assigned to each application at the time the applications were placed on the waiting list. All applications in the primary pool will be selected prior to any application in the secondary pool.

Completion of final eligibility will be conducted via mail and/or subsequent on-line electronic systems. CHA will mail notification to selected applicants at the address on file of the requirements to complete the final eligibility process. Instructions for completion of the formal application will be provided in the notice including a date by which the formal application must be completed and returned.

If the family does not complete the eligibility packet by the stated deadline, the applicant will be removed from the waiting list and will not be reinstated except for reasons described in 3.7 above. Reasonable accommodations will be made for persons with a disability.

Special Purpose Section 8 Assistance Programs

Certain vouchers may be received or were received from HUD as the result of a special funding for targeted groups of households. CHA will admit these families under a Special Admission procedure. Special admissions families will be admitted outside of the regular waiting list process and they are not required to be on the program waiting list. CHA will maintain separate records of these admissions.

The following are examples of types of program funding that are designated as special admissions:

- Vouchers received for demolition or disposition of a public housing project.
- Vouchers received for multifamily rental housing projects when HUD sells, forecloses or demolishes the project.
- Vouchers received for “opt-out” of FHA insured multi-family projects.
- Moderate Rehabilitation Project-based Section 8 HAP contracts at or near the end of the HAP contract term that convert to tenant-based vouchers.

Targeted Funding for Special Programs

Special programs have been developed under the Housing Choice Voucher Program to service certain family types or certain family situations. Most of these programs require that CHA partner with a service agency in the community that provides supportive service to the family include the following:

- Veterans Administrative Supportive Housing (VASH) vouchers.
- Family Unification Program vouchers (FUP).
- Mainstream vouchers.

When HUD grants funding under these programs, families who meet the qualifications of the program and are referred through the partner agency will be placed on a separate waiting list for each special program type based on date of referral from the partner agency. These families will then be selected in order of date from the waiting list when their special program voucher is available.

CHA will continue to receive referrals from partner agencies until all designated vouchers have been utilized. Upon 100% utilization, CHA will request that the partner agencies suspend additional referrals until such time that any of the original designated vouchers are turned over and again become available for issuance to applicants. At that time, CHA will contact the appropriate partner agency and advise them of the availability of the targeted voucher and a referral will be accepted accordingly.

The provisions for targeted funding identified herein apply to any future programs to be so designated by HUD.

The terms of this Addendum are intended by the parties to be added to and incorporated into the Rental Lease Agreement between Resident(s) and Columbia Housing.

1. Resident understands that Bedbugs are an ongoing problem in rental housing and that Resident plays an important role in ensuring that Bedbugs do not infest the Premises. This Addendum defines Resident's responsibilities under the Rental Lease Agreement regarding Bedbug control. By signing this Addendum, Resident affirms that he/she has inspected the Premises at move-in and confirms that there are no/were no Bedbugs present in the Premises at the time of Resident's move-in.

2. Resident affirms that any and all personal property (furniture, clothing, mattress, bedding, etc.) that Resident brings into the unit have been inspected for Bedbugs and all possessions are free of bedbugs and eggs. If Resident detects that any personal property may have Bedbugs, Resident agrees not to bring anything containing bedbugs onto the Premises. Resident agrees to carefully inspect all personal property he/she brings into the Premises prior to entering the Premises to ensure that the property is free of Bedbugs. Resident agrees to do his/her part to ensure Bedbugs do not enter the Premises after he/she moves in, including, but not limited to: continuing to check any personal property that is brought onto the Premises for Bedbugs; checking all luggage, clothing and other personal belongings for Bedbugs if Resident stays in a hotel or visits another home; uses public transportation; or utilizes other public areas that may carry Bedbugs. In addition, Resident agrees to inspect furniture and personal belongings after guests visit or stay in the Premises to ensure no Bedbugs were brought on the Premises by guest.

3. Resident agrees to report any sighting or signs of Bedbugs immediately to the office or to the work order system. Since Bedbugs multiply fast and can become an infestation affecting not only the Resident, but other individuals/units, Resident understands that it is of utmost importance to report of any Bedbug sightings or signs immediately.

4. Resident agrees to cooperate in every way with Columbia Housing's requests to enter and inspect the unit by a member of the CH or by our assigned pest control contractor to conduct treatments and/or inspections of the affected unit or surrounding units until bed bugs are eliminated. Resident shall cooperate fully with request or instructions to facilitate the detection and treatment of bedbugs, including providing requested information that may aide in elimination of bedbugs.

5. Resident understands that Bedbug control preparation can be extensive and may include items such as special washing instructions for bedding, clothing etc. or disposing of personal property that cannot

be disinfected. Resident understands this preparation may be burdensome but agrees to comply on the first treatment attempt. Public housing residents will not be charged for bed bug elimination but will be charged a trip charge if they fail to prepare for a treatment as instructed. They may also be charged an additional trip charge should they fail to follow up with follow up instructions after the initial treatment if subsequent treatments are necessary. This charge will be determined by the pest control contractor. Columbia Housing Residents, not residing in public housing may be charged a portion or all of the elimination treatment for bedbugs. They too may be charged an additional trip charge if resident fails to cooperate with bed bug treatment preparation and or follow up.

6. Resident understand and agrees that he/she is responsible to do what he/she can to prevent any Bedbugs from entering the Premises and/or to limit any infestation by taking instructed precautions.

7. Resident agrees to hold Columbia Housing harmless from any claims, losses, damages and expenses caused by Bedbugs, including Resident's failure to reasonably take said precautions to control Bedbugs and/or Resident's negligent actions regarding Bedbug control.

8. Resident agrees to obtain personal property/renters' insurance to protect him/her against any loss relating to Bedbugs and/or Bedbug infestation. Resident agrees not to hold Columbia Housing liable for any loss of personal property due to Bedbugs or a Bedbug infestation and understands that CH will not replace bedding, furniture, clothing or other personal property as a result of bedbug infestation.

Information about Bed Bugs: (a) Bed bug Appearance: Bed bugs have six legs. Adult bed bugs have flat bodies about 1/4 of an inch in length. Their color can vary from red and brown to copper colored. Young bed bugs are very small. Their bodies are about 1/16 of an inch in length. They have almost no color. When a bed bug feeds, its body swells, may lengthen, and becomes bright red, sometimes making it appear to be a different insect. Bed bugs do not fly. They can either crawl or be carried from place to place on objects, people, or animals. Bed bugs can be hard to find and identify because they are tiny and try to stay hidden.

Life Cycle and Reproduction: An average bed bug lives for about 10 months. Female bed bugs lay one to five eggs per day. Bed bugs grow to full adulthood in about 21 days. Bed bugs can survive for months without feeding.

Bed bug Bites: Because bed bugs usually feed at night, most people are bitten in their sleep and do not realize they were bitten. A person's reaction to insect bites is an immune response and so varies from person to person. Sometimes the red welts caused by the bites will not be noticed until many days after a person was bitten, if at all.

Common signs and symptoms of a possible bed bug infestation: • Small red to reddish brown fecal spots on mattresses, box springs, bed frames, mattresses, linens, upholstery, or walls. • Molted bed bug skins, white, sticky eggs, or empty eggshells. • Very heavily infested areas may have a characteristically sweet

odor. • Red, itchy bite marks, especially on the legs, arms, and other body parts exposed while sleeping. However, some people do not show bed bug lesions on their bodies even though bed bugs may have fed on them.

For more information, see the Internet Web sites of the United States Environmental Protection Agency and the National Pest Management Association.

By signing below, Resident(s) acknowledges and confirms that he/she has received, reviewed and understands this Addendum.

This Addendum may be executed in counterparts and facsimile copies of same shall be admissible for all purposes and shall be deemed an original.

Resident(s):

_____	Date_____
_____	Date_____
_____	Date_____
_____	Date_____
_____	Date_____
_____	Date_____

Owner/Agent:

_____	Date_____
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Community Service and Self-Sufficiency

The economic self-sufficiency plan consists of activities conducted by CHA's support staff to assist residents with increasing their income and decreasing dependency on government assistance. With CHA stabilizing housing, the most critical need that impact many families no longer pose as a barrier for them. The Family Self Sufficiency (FSS) Department provides supportive services that connect individuals to resources that will eliminate the most prevalent issues preventing them from becoming economically self-sufficient. Barriers such as unemployment, lack of skills, education, substance abuse, transportation, childcare and mental health affect the capacity for individuals to change their circumstances and increase the revolving cycle of poverty. The FSS Department has a number of programs to provide assistance with finding employment, job training, soft skills training, financial literacy counseling, education and homeownership resources. Several strategies will be implemented to assist families decreasing dependency on government assistance.

The strategies to assist families are:

1. Conduct outreach to all community members.
2. Complete Needs Assessments on each household
3. Development an Individual Training and Service Plan (ITSP) for each household identifying goals, barriers and supportive service needs.
4. Identify resources and funding opportunities to assist families with the outputs specified in the ITSP.
5. Use the supportive service staff to conduct outreach, coordinate services, provide case management and monitor progress in meeting the milestones listed in the ITSPs.
6. Evaluate the needs for services for each member of the household. Ensure that services are provided holistically encompassing the entire family unit.
7. Provide education, workforce development programs, financial literacy counseling, mental health and substance abuse training and referrals for employment opportunities.
8. Conduct follow-up and evaluation techniques with families to determine whether or not the self-sufficiency strategies implemented are effective.
9. Seek funding and partnerships to bring resources for CHA's families.

Component 12A: Cooperative Agreement with TANF Agency and other Coordinated Efforts

The following services are available through cooperative agreements with various service providers to provide supportive services for families served by Columbia Housing. The Family Self-Sufficiency Department coordinate services with the partnering organizations and ensures that families are aware of resources available within the community.

Supportive Services

Case Management

The case management team will coordinate services for all individuals receiving housing assistance from CHA. To ensure accessibility to residents, case managers have offices set up in the communities along with property managers and administrative staff. They are responsible for coordinating activities, engaging residents in programs, monitoring compliance with the mandated community service policy and providing supportive services to families in the communities.

Workforce Development Programs

Workforce Development activities provide training, education, and mentoring opportunities for residents interested in improving their quality of life. The programs made available directly through CHA are as follows:

- ELEVATE Program – program created to address the major component of life skills and interpersonal development. Each cycle of class is 5 weeks with students completing 9 hours of training each week.
- Career Development Program consists of comprehensive in-house training on employment skills. The class is designed to help residents successfully assimilate into the workplace and secure employment. The curriculum provides training in workplace ethics, dressing for success, writing resumes, interviewing techniques, communication, goal setting, and decision making. Residents who participate in this program gain employment skills and are assisted with finding employment and/or enrolling in a job training program. Several viable partnerships have made it possible for the Career Development Program to continue to be a success.
- CHA partners with Richland School District One for a variety of programs relating to education including GED/High School Diploma Classes, Computer Training, and Work Keys. The partnership makes available programs for CHA adults to participate in programs that help them achieve their education goals.
- CHA has a network of agencies to connect residents with job training and educational opportunities. Some of CHA's partnering agencies are Goodwill Industries, Midlands Workforce Investment Opportunities Agency (W.I.O.A.), Richland County Department of Social Services (DSS), Midlands Technical College and Richland County Community Development. All of the partners provide funding and/or services to help residents become employed.
- The ROSS Service Coordinator Grant was awarded in 2018 for AMPs 3 and 4. The grant funded salaries, benefits and administrative costs for Service Coordinators to assist

families with development individuals training and service plans and connecting them to workforce opportunities.

- The Columbia Housing is a HUD approved ConnectHome Authority. As a ConnectHome housing authority, various strategies have been put into place to connect residents with broadband technology and create access to economic self-sufficiency, financial literacy programs, healthcare initiatives, and education programming. CH residents have opportunities to use computer technology through the computer labs at the Cecil Tillis Center and at the community centers in various properties. The computer labs provide access to navigating the internet, preparing resumes, conducting employment searches and performing activities for education purposes. Computer Classes are available for individuals requesting assistance.
- CHA has partnered with the United Way and Cooperative Ministry to provide free income tax preparation services for qualified individuals during the peak tax season. The tax program uses volunteers to provide preparation services for individuals with Adjusted Gross Income (AGI) less than \$65,000 for individuals and \$95,000 for persons filing married. The Cecil Tillis Center has been one of the most visited tax preparation sites in the Midlands and continues to be a place where residents can have their taxes prepared for free.
- Several other community partnerships target working with CHA's youth helping them to have safe, healthy and viable lives. A partnership with Richland Library to offers the *Here Comes Kindergarten* early literacy program for residents in targeted communities. Other youth initiatives include summer youth employment and assisting youth with applying for scholarships for college.

Subcomponent 12B (1)

Services	Programs Offered	Estimated Size	Allocation Method	Access	Eligibility
Education	Adult GED Classes, Literacy, High School Diploma and College Enrollment	Unknown	Referral and/or direct intake	Richland One Adult Ed, Richland 2 Adult Ed., and Lex/Rich 5 Adult Ed, and Richland Library	Both
Workforce Development	Soft skills Training and career coaching	Unknown	Referral and/or direct intake	Columbia Housing, Dept of Social Services,	Both

				Richland Library, Midlands Tech, Voc. Rehab and Goodwill Industries	
Job Training	Financial assistance with short term job training programs	Unknown	Direct intake	Workforce Invest Opportunities Act funding, Goodwill Industries	Both
Financial Literacy	VITA Program, Budget and Credit Classes, Financial Literacy Counseling	Unknown	Registration, referrals, and/or direct intake	Cooperative Ministry	Both
Life Skills	ELEVATE Program	Unknown	Registration and/or referrals, open attendance	Columbia Housing	Both
Medical Services	Basic healthcare services	Unknown	Registration and specific criteria	Eau Claire Cooperative Health Centers, Free Medical Clinic, Prisma Health,	Both
Computer Training	Technology classes and access to affordable technology services	Unknown	Registration and specific criteria	Connect Home, New Horizon	Both
Transportation	Bus Services	Unknown	Open Access and discounted rates for income specific populations	Comet Transit Services	Both

Childcare	Childcare and early childhood education	Unknown	Specific criteria and waiting lists	Department of Social Services and Richland County First Steps	Both
Substance Abuse	Substance Abuse Treatment	Unknown	Direct Intake	LRADAC	Both
Mental Health	Mental Health Counseling	Unknown	Direct intake	Columbia Area Mental Health	Both

Subcomponent 12B (2) Family Self Sufficiency Program

Currently, two Family Self Sufficiency Program are operated by Columbia Housing. The FSS Program provide support services for both public housing and HCV households. Both programs are fully operable, and CH has been funded for the FY 2019 FSS Coordinator Grant. **See Exhibit M for FSS Action Plan**

FSS Program	Minimum Program Size
HCV	The HCV Program has met is minimum program size obligations. The program has 21 individuals enrolled.
Public Housing	The Public Housing Program has 30 participants enrolled.

Subcomponent 12C: Compliance with Statutory Requirements

The Columbia Housing will ensure compliance with statutory requirements that dictate treatment of changes in income as a result of welfare programs. Some of the compliance activities include:

- Adoption of changes in rent policies and ensuring that staff is appropriate informed and trained on the changes;
- Informing residents of change in reexamination and rental policies;
- Establishing agreements with Department of Social Services and
- Establishing protocols for exchange of information.

The CHA implemented the Community Service requirement in 2003 in accordance with HUD regulations. Unemployed residents over the age of 18 who are not disabled or have an exemption under HUD regulations are required to participate in education or training programs or complete community service (volunteer) activities. The case management staff coordinates compliance activities with property managers and assists with maintaining documentation on residents who are fulfilling their obligations as required. Residents have an opportunity to fulfill the community services requirement through several coordinated programs and activities offered

through the Family Self Sufficiency Department. The Community Service Plan is outline in the ACOP. Verification of compliance with the community service requirement may be coordinated with the local TANF agency.

Columbia Housing
Family Self Sufficiency Program
Action Plan

- I. Introduction
- II. Goals and Objectives
- III. Participant Demographics
- IV. Program Size
- V. Outreach Efforts
- VI. Incentives to Encourage Participation
- VII. Method of Identification of Family Support Needs
- VIII. FSS Activities and Supportive Services
- IX. Contract of Participation
- X. Participant Monitoring
- XI. Assurances of Non-Interference with Rights of Non-Participating Families
- XII. Timetable for Program Implementation
- XIII. Certification of Coordination
- XIV. FSS Participant Screening and Selection Procedures
- XV. Standards for “Seeking and Maintaining Employment”
- XVI. Method of Establishing a Participant List
- XVII. Grievance Procedure/Penalties for Non-Compliance
- XVIII. Cause for Termination
- XIX. Termination of Participation
- XX. Portability and FSS
- XXI. Escrow Account
- XXII. FSS Program Coordinating Committee
- XXIII. Columbia Housing Discretionary Policies
- XXIV. Equal Opportunity

Family Self-Sufficiency Action Plan

Since 1934, The Housing Authority of the City of Columbia, SC has been providing housing for low to moderate income families in Richland County and the City of Columbia. Since 1994, Columbia Housing (CH) has operated the Family Self-Sufficiency (FSS) Program to assist families with obtaining economic self-sufficiency. The program is one of the components that supports Columbia Housing's mission to meet the emerging affordable housing needs of low to moderate income individuals and families in the City of Columbia and Richland County while promoting self-reliance and improving the quality of life. With coordination of services, development of vital partnerships, and creation of economic opportunities, the FSS Program is a well-incentivized program that promotes self-sufficiency. The information obtained in this Action Plan reflects policies and procedures for operating FSS eligible activities.

I. Introduction

The Family Self-Sufficiency (FSS) program is an U.S. Department of Housing and Urban Development (HUD) program designed to assist families with utilizing community resources and support mechanisms to obtain economic independence. The FSS Program utilizes housing as a stabilizing force, while enabling families to invest their energies in efforts that will improve their quality of life. Examples of such activities are education, job training programs, financial literacy counseling, life skills, workforce development, individual counseling, and employment. The objectives of the program is to assist families in obtaining employment that will allow them to become economically self-sufficient and independent on welfare assistance within five (5) years of enrolling in the program.

Families enrolling in FSS work with an assigned case manager to develop goals that will be achievable within a five (5) year period. The goals are included as a component of the contract, which is signed by the head of household and a representative of Columbia Housing. The goals must include seeking and maintaining suitable employment and independent of welfare assistance for twelve (12) consecutive months prior to the contract expiration or completion of goals. Other FSS goals may include but are not limited to education, job readiness, career counseling, homeownership, financial literacy education, and substance abuse counseling.

The FSS goals are outlined on the contract in the Individual Training and Services Plan (ITSP). As the family meets their goals and completes the contract, they become eligible to receive the funds from an escrow account established on their behalf. The amount credited to the escrow account is based upon increases in the family's income from employment relative to the baseline earned income included on the Contract of Participation (COP) during the term of enrollment.

II. Goals and Objectives

- A. To assist Public Housing and Housing Choice Voucher (formerly 'Section 8') participants enter or re-enter the economic mainstream.

- B. Connect families to required services and resources needed to achieve independence.
- C. Develop sustainable public and private partnerships to provide resources for families participating in the program.
- D. Establish a network of supportive services to avoid duplication of services.
- E. Break the dependency cycle perpetrated from two or more generations of families with a significant rate of unemployment or underemployment.
- F. Decrease and/or eliminate dependency on government assistance to sustain households.
- G. Develop and implement an exemplary Family Self Sufficiency Program that will promote economic self-sufficiency.
- H. Increase the number of households with incomes at or above 80% of the AMI.
- I. Increase the number of wage earning households.

Columbia Housing ensures that development of services and activities under the FSS program are coordinated with Workforce Development Boards, education institutions, Health and Human Services Agencies, and private industries. Implementation will continue to be coordinated in order to avoid duplication of service and activities.

III. Participant Demographics

Initially, Columbia Housing had 174 slots to be issued to residents – ninety-eight (98) slots for public housing residents and seventy-six (76) slots for Housing Choice Voucher residents (Mod Rehab participants are exempt from participating). The information below provides demographics for both public housing and HCV FSS participants.

A. Public Housing

Number of Households in FSS Program - 28

Number of Male HOH - 3

Number of Female HOH - 25

Number of Disabled Households - 2

% Blacks/African American – 100%

Percent of White - 0%

Percent of Other - 0.0%

Average Household Income - \$23,612

Number of Wage Earning Households - 26

Number 30% of AMI – 12

Number 50% of AMI – 7

Number 80% of AMI – 8

Number greater than 80% of AMI - 1

B. Housing Choice Voucher/Section 8

Number of Households in Program - 20

Number of Male HOH - 0

Number of Female HOH - 20

Number of Disabled Households - 1

% Blacks/African American – 100%

Percent of White - 0%

Percent of Other - 0%

Average Household Income - \$19,821.00

Number of Wage Earning Households - 16

Number 30% of AMI – 10

Number 50% of AMI – 5

Number 80% of AMI – 5

IV. Program Size

In accordance with the Quality Housing and Work Responsibility Act of 1998, a PHA's minimum program size is reduced by one slot for every FSS Contract of participants that is completed after October 21, 1998.

Public Housing: Columbia Housing initially had ninety-eight (98) slots, the FSS minimum program size obligation to HUD. As of June 2019, the current minimum program size is 37 slots. Columbia Housing is requesting to add an additional thirty (30) voluntary slots to the public

housing program to expand the number of households eligible to participate in the program. This would bring the program size to a total of 67 participants for public housing.

Housing Choice Voucher/Section 8: The HCV FSS Program has successfully graduated all participants of the seventy-four (74) slots that were initially obligated by HUD. The current program size is 20. Columbia Housing is requesting to expand the program to add an additional thirty (30) slots to maximize the number of participants in the program. This would equate to a program size of fifty (50).

With the expansion of Project Based Voucher (PBV) developments, there are a number of families who would benefit from participating in the FSS Program. Columbia Housing will allow families residing in the PBV developments to enroll in the FSS Program. The PBV program size will be forty (40).

V. Outreach Efforts

Columbia Housing's FSS Supportive Services team makes consistent effort to recruit minority and non-minority families to participate in the FSS Program. Any family with language and disability barriers will receive comprehensive services to eliminate such barriers that would prevent them from participating in the FSS Program. Columbia Housing will ensure that all information dissemination tools be transcribed into the household's primary language. Interpretation services will be provided when the need is applicable for individuals with disabilities that require such services. Some of the various methods used will consist of:

- A. Presenting the FSS Program at Columbia Housing's HCV and Public Housing orientations
- B. Direct outreach through the service coordinators meeting with individual and families and introducing the program
- C. Disseminating flyers and placing brochures in public housing and HCV operations offices
- D. Agency wide resident newsletter
- E. Presentation of the FSS Program at public housing community meetings
- F. Referrals from public housing management staff and HCV Contract Specialists
- G. Agency's social media
- H. Interpreters for non-English speaking families

VI. Incentives to Encourage Participation

FSS is a highly incentivized program with the escrow account being the primary incentive that promotes participation. The incentives are in place to encourage participation and help families eliminate barriers to successfully completing the program. The Columbia Housing Authority reserves the right to provide other appropriate incentives as resources are available to promote program participation. All other incentives not included in the list below are subject to availability

of resources and not mandated by the program. The following are incentives for program participants:

- A. Escrow Account - is an interest bearing account established by the housing authority for each participating family. An escrow credit is based on increases in income from employment only. FSS families must increase their earned income in order for credits to be applied to the escrow account. This information must be reported to the property management office or HCV Specialist so that recertification can be conducted to determine the appropriate credit. The escrow credits are applied to the account on a monthly basis. A family who completes all of the goals in the FSS Contract of Participation will be eligible to receive the funds from the escrow account.
- B. Individuals and/or families engaged in the program will be paired with an FSS Coordinator to provide case management services. The Coordinator will help individuals and/or families develop the ITSP which is a component of the Contract of Participation. The Service Coordinator serves as a mentor, contract monitor, and supportive services coordinator for program participants.
- C. Supportive Services are provided for individuals enrolled in the FSS Program. The services include, however are not limited to, the following and are only applicable when resources are available: assistance with education programs, job training, financial literacy counseling, debt management, homeownership counseling, down payment assistance programs, childcare assistance, transportation, individual counseling services, and workforce development training.

VII. Method for Identification of Family Support Needs

The FSS Coordinator will conduct an initial needs assessment on each household to identify the needs of the entire household. It is imperative that the needs of all members of the household are addressed to ensure that threats to self-sufficiency are eliminated. Information obtained from the assessment will be used to determine which supportive services are required and establish the ITSP. The needs of the family will be assessed on an annual basis to determine new gaps in services and whether existing needs have been addressed.

The assessments will be completed in a face-to-face interview during the initial one-on-one meeting with the head of household. The assessment will be used to establish goals, strategies, identify resources, and target dates of completion. Some of the common issues of concern identified in assessments are: lack of transportation, childcare, education barriers, poor work history, derogatory credit, criminal convictions, lack of health insurance, substance abuse, health issues, and unemployment. Completion of goals and receipt of supportive services are tracked by

the FSS Coordinator and program participant on a continual basis. The participant bears the responsibility of providing documentation that goals have been completed.

VIII. FSS Activities and Supportive Services

Services to Be Provided

A. Workforce Development Program

Those participating families receiving TANF, unemployed and/or underemployed are encouraged to participate in workforce development activities. Columbia Housing's FSS staff will provide individualized job development for such persons in order to assist securing employment in jobs that match their skill level with livable wages.

B. Education and Training

1. FSS participants not enrolled in the South Carolina Department of Social Services' (SC DSS) Work Support Program will have an opportunity to attend the Career Development Training Program offered by Columbia Housing. The program will provide work readiness training in the areas of interviewing techniques, employment searching, effective communication skills, resumé writing, proper workplace dress, safety on the job, ethics, and goal setting. Columbia Housing will work with the local WIOA and youth WIOA Programs to assist residents with obtaining resources for training and employment opportunities.
2. Participants who do not have a high school diploma or GED will be referred to an adult education program to enroll in classes. They will be tested by the institutions to determine education levels and placed in the appropriate program based upon their knowledge assessment. Those individuals with low literacy scores will be referred to programs that focus on adult literacy learning. The FSS Coordinator will work with participants to determine if the desire to complete advance education and/or training programs through local colleges, technical schools, and skilled based training programs are present. The FSS Case Manager will assist participants in completing paperwork to obtain financial aid, grants, and loans, if applicable.

C. Childcare

Childcare for TANF/FI clients is provided by DSS through its Work Support Program. Non-TANF participants' childcare will be coordinated by the FSS Coordinator and participant. Childcare centers, private nursery schools and churches will be contacted in an effort to secure scholarships or discounted childcare services for FSS participants. A participant may use FSS escrow funds on

a limited basis to pay for childcare services if assessed as a barrier to employment, education, or training goals. The FSS Coordinator and participant must have a long term childcare plan in place and present it to the VP of Resident and Family Services when requesting approval to utilize escrow funds. The VP of Resident and Family Services may establish limitations on the maximum amount of funds that could be used for childcare services. It is the responsibility of the participant to select and coordinate services with a provider.

D. Transportation

1. Most of the services and agencies identified in the needs assessments are accessible by public transportation. Columbia Housing will make every effort to assist with transportation as needed.
2. The FSS Coordinator will seek additional avenues for providing transportation utilizing the coordinating committee as resources.
3. Transportation resources may include, but not limited to, bus tickets, cab services, and car repairs. Funds and/or resources must be available in order for the services to be provided.

E. Counseling

1. Columbia Housing will provide or assist with connecting families to various counseling resources in the following areas:
 - (a) Home Buying
 - (b) Financial Literacy and Credit Counseling
 - (c) Home and Yard Maintenance
 - (d) Opportunities for home ownership/responsibilities of home ownership
 - (e) Individual counseling such as substance abuse and mental health

Any additional services and resources needed to assist participating families in reaching their goals.

2. The FSS Coordinator will coordinate career counseling and personal development training. Community resources will be effectively coordinated for the most beneficial outcome for the client. The client's full participation will be encouraged. Available community resources include both the "people support system" (natural environment, family, friends, etc.) and the human service delivery system.

F. Other Supportive Services

Stabilizing the family is a major obstacle to economic self-sufficiency. The FSS Coordinator will ensure that participants are connected with supportive services that address the needs of the entire household. Addressing issues related to health care, utility payments, and food insecurities are just a few other supportive service issues the FSS Coordinator will address with participants and ensure that the families are stable in all aspects.

Public and private sector providers will include but not be limited to:

1. Richland One Adult Ed.
2. Columbia Housing Authority
3. Midlands Technical College
4. GLEAMNS Headstart
5. Richland County Public Library
6. Salvation Army
7. Richland County First Steps
8. City of Columbia
9. Security Federal Bank
10. Columbia Urban League
11. Richland County Department of Social Services
12. Columbia Cooperative Ministries
13. Midlands Workforce Development Board
14. Goodwill Industries
15. Wateree Community Action Agency
16. Harvest Hope Food Bank
17. United Way of the Midlands
18. Benedict College
19. The COMET Transit System

Case Management

It is imperative that working relationships be developed between the FSS Coordinator and participant. The Coordinator will be responsible for coordinating services, ensuring that the C.O.P. is adhered, maintaining the FSS escrow account, documenting successfully completion of the goals established in the contract.

IX. Contract of Participation

- A. A Contract of Participation will be signed between Columbia Housing and the participating family that sets forth the provisions of their individualized action plan. The contract will specify the resources and appropriate FSS supportive services available.

- B. The person designated in the Contract of Participation as the head of the household will be required under the contract to seek and maintain suitable employment. The FSS head of household must be the head of the family as specified in the lease. The only exception is if the head of family were unable to participate due to age or disability.
- C. The contract will provide that each participating family be required to fulfill those obligations for which the family has committed itself - no longer than five (5) years after entering into the contract. The person designated in the Contract of Participation as the head of the participating family will be required under the contract to seek and maintain suitable employment. Columbia Housing has the ultimate responsibility for determining job suitability. Suitability will be based on individual skills, educations and available jobs objectives of the FSS program. Lack of adherence to the Contract of Participation will be grounds for termination.
- D. The parties to the Contract of Participation may mutually agree to make changes to the contract on terms acceptable to both parties; provided the changes are consistent with the objectives of the FSS program. Lack of adherence to the Contract of Participation will be grounds for termination.
- E. The contract specifies the responsibilities and obligations of the participating family. The effective date of the FSS contract will be on the first day of the month following execution. The term of the FSS contract between the first participant and Columbia Housing will be for five (5) years. Per regulations, the contract may be extended at the family's request for up to two additional years for good cause. "Good cause" is defined as circumstances beyond the control of the participant that s/he could document prevented completion of the contract within the five (5) year allotted time period. Extensions are made at the discretion of Columbia Housing.

X. Participant Monitoring

The ITSP is maintained on each participant and includes all information beginning with the program's application form until the completion of the program. As the participant progresses through the program, status updates will be gathered and integrated into the participant's file. Coordination among service providers plays a major role in the monitoring process. The FSS Coordinator is responsible for development of the evaluation activities, monitoring the C.O.P, as well as overall evaluation of participants on a quarterly basis. This information is entered into the participant's file and updated on the ITSP. Completion of the ITSP goals will be included in the Annual Evaluation Reports to HUD.

XI. Assurances of Non-Interference with Rights of Non-Participating Families

Participation in the FSS Program is strictly voluntary. Columbia Housing encourages participation in the FSS program; however, a family's decision not to participate will not affect its right to occupancy or assistance in accordance with its lease or voucher. Public housing tenancy and Housing Choice Voucher rental assistance will not be impacted by families who elect not to participate in the FSS Program.

XII. Timetable for Program Implementation

Columbia Housing has already begun implementation of the program. Any vacant slots will be filled upon following the following procedures:

- A. Continual outreach using the strategies identified in the Action Plan
- B. Contact will be initiated via mail and/or e-mail to families who expressed interest in enrolling in the program
- C. Appointments will be scheduled for prospective participants
- D. A waiting list will be maintained by the FSS Coordinator if all slots are filled

XIII. Certification of Coordination

Columbia Housing has certified coordination of services with public and private partners to include programs funded by the Department of Labor, Department of Health and Human Services, local colleges, school districts, private institutions, non-profits, and government entities to provide supportive services and resources to FSS families. Implementation will continue to be coordinated to avoid duplication of services.

XIV. FSS Participant Screening Selection Procedures

- A. The Program is offered to residents presently living in public housing, receiving assistance under the Housing Choice Voucher and Project Based Developments (Mod Rehab and ineligible to participate) who are interested in the FSS Program.
- B. Columbia Housing will use limited motivational screening to select among families who express an interest in FSS in accordance with HUD guidelines. This screening will not be based on the family's education, training or their likelihood to succeed. Limited motivational screening will be based on the completion of pre-selection tasks, such as completion of the FSS application forms, attendance at orientation sessions, and meetings with the FSS Coordinator.
- C. The participants will be required to attend an orientation which is facilitated by the FSS Coordinator to learn more about the program. Prospective participants are required to complete an FSS Interest Form. This form will identify basic contact information and has

questions related to how the prospective participant learned about the program and why they are interested in being a participant of the program.

D. The next stages consists of the interview process. This affords the FSS Coordinator an opportunity to observe applicants' demonstrated willingness to participate in FSS and interest in completing tasks to develop the ITSP. Each applicant will be required to participate in three intake sessions with the FSS Coordinator.

1. The initial session will be comprised of completing the assessment and thorough review of the FSS Program policies and procedures.
2. The second session will consist of developing the ITSP and demonstrating how escrow accounts accrue monthly credits. During this session, the FSS Coordinator will use information from the needs assessment to assist the applicant with identifying barriers impacting him/her from completing their goals and resources available to assist with overcoming the obstacles.
3. The final session is established for reviewing and signing the FSS Contract of Participation. The entire process may take more than three sessions to complete. The FSS Coordinator is not obligated to only conducting three intake sessions with the applicant. Three is the minimum of meetings an applicant must adhere to in order to move to the final stage of enrollment. Participants are given copies of the signed documents for their records and a "What's next to expect" information sheet.

XV. Standards for "Seek and Maintain Employment"

According to the FSS program regulations and the FSS contract, the head of the FSS family must "seek and maintain suitable employment" throughout the duration of the contract. The FSS participant must meet with the Case Manager monthly if s/he becomes unemployed. The requirement to seek and maintain employment during the contract term does not preclude a family's head of household from attending school for four years and obtaining a job in the fifth year. Columbia Housing does encourage participants who are attending school on a part-time or obtain concurrent job training.

XVI. Method of Establishing Participant List

A. If Columbia Housing has more FSS applicants than it has available slots in its FSS Program, a separate FSS waiting list by date and time will be established. Names of those families who are interested in participating in the FSS Programs will be placed on the FSS waiting list by:

1. Date and time that resident/participant submits the FSS interest Form; and

2. Attendance at the mandatory briefing session and submission FSS Interest Application.

NOTE: If a family does not attend mandatory briefing sessions, his/her name may also be removed from the waiting list.

- B. If a family attends the mandatory briefing session and does not submit FSS Interest Form within (21) days after the briefing, his/her name may be removed from the waiting list.

XVII. Grievance Procedure/ Penalties for Non-Compliance

- A. In the event that the family is found to be in breach of his/her contract, the family may remain in public housing providing the terms of their contract were not violated. The family is entitled to present a grievance in accordance with the Public Housing Grievance Procedures.
- B. A family's decision not to participate or to withdraw from the program may not affect its admission or right to occupancy in ordinance with the lease.
- C. Termination decisions will be recommended by the FSS Coordinator with approval of the VP of Resident and Family Services. This decision will be based upon information documented in the FSS file, regulations, and policies established in the FSS Action Plan.
- D. If for any reason Columbia Housing terminates the Contract of Participation, the FSS participant may not be allowed to participate in the FSS program for two (2) years, without approval of the VP of Resident and Family Services, FSS Coordinator, and the Executive Director of Columbia Housing.
- E. Termination from the FSS Program will not result in termination of the family's rental assistance.
- F. If the head of the FSS family does not seek and maintain employment or never finds employment during the contract's five year term, the family has not met its FSS obligations. Columbia Housing may terminate the family's participation in the FSS Program. The family may request an informal hearing in accordance with the Authority's grievance procedure.

XVIII. Cause for Termination

There are common reasons why families are terminated from the program. If terminated, participants forfeit all rights to receiving any escrow monies. The reasons for termination are:

- A. Failure to Maintain Contact with the FSS Coordinator - Participants are required to meet with the FSS Coordinator at least once quarterly to update on progress toward completing their goals. The Coordinator may require the participant to meet on a more frequent basis if needed until self-sufficiency have been resolved. In this case, the Coordinator will document the frequency of meeting and make adjustments as necessary.
- B. Failure to be present for appointments – The FSS Coordinator will initiate contact with participants and provide appointments flexible to their schedules. Failure to be present for three (3) scheduled appointments consecutively may result in immediate termination from the program.
- C. Failure to Meet and Complete Goals – Failure to meet obligations in the ITSP to complete FSS goals is grounds for termination. The FSS Coordinator will monitor goals and target dates of completion. Participants must provide proof that they are working on goals and/or he or she has successfully completed each goal listed in the ITSP.
- D. Any lease violation will result in termination from the program. Lease violations include, but are not limited to, failure to report income changes in a timely manner, failure to pay rent, involvement in criminal activities, etc.
- E. At the request of the Head of Household (HOH), the contract may be terminated without cause.

XIV. Termination of Participation

- A. FSS Participants are required to meet all HUD regulatory and statutory requirements
- B. The Contract of Participation may be terminated by:
 - 1. Mutual consent of the parties
 - 2. A recommendation after reviewing relevant information that the contract be terminated due to failure of the participating family to honor the terms of contract without good cause is defined as circumstances by the control of the participating family.
 - 3. Failure by the Head of the Household in the contract to seek and maintain employment.
 - 4. Completion of the FSS contract/ Self Sufficiency.
 - 5. Expiration of the terms of the Contract and any extension thereof.
 - 6. Automatically terminated if HCV or public housing assistance is terminated.

- C. In the case of participating family that has opted to move, as provided under federal guidelines, but is unable to fulfill its obligations under the contract of participation, or any modification thereto, Columbia Housing may terminate the participating family from the FSS Program and the escrow account be forfeited.

XX. Portability and FSS

HCV residents must complete the first year of the FSS program before s/he can to another PHA jurisdiction. The participating family shall continue in the FSS program after they demonstrate their ability to fulfill their responsibilities under the initial or modified contract at the new residence. The established escrow may be transferred to the future PHA.

XXI. Escrow Account for Self-Sufficiency Programs

Each FSS participant will have its own escrow account. Each escrow account will have a separate General Ledger Account in Columbia Housing's accounting system. This FSS General Ledger Account will consist of subsidiary ledgers containing individual information on each individual FSS participant including but not limited to name of participant, date participant entered the program, individual escrow transaction by date and amount, interest earned on individual's balances and date that account was terminated or fully disbursed. Interest earned on an escrow account will be earned on a monthly basis and allocated to the individual accounts.

FSS participants may receive interim disbursements after they have attained certain interim goals as stated in their ITSP. Interim disbursements must be determined to be essential for completion of the contract. Interim Disbursements will not be made to participants who are not in good standing with Columbia Housing, i.e. late rental payment. All interim disbursements must be justified in accordance with the Contract of Participation and solely based upon assisting the family with completing the goals in the ITSP. The FSS HOH has the responsibility of providing documentation of the need for an interim disbursement. The family may not receive a disbursement of greater than 25% of the existing escrow balance. Columbia Housing has sole discretion of approving all interim disbursements.

Participants will be provided escrow balance statements annually. The statements will include beginning reporting balance, current balance as of the statement period, interest accrued, adjustments, escrow credits, and payouts.

XXII. FSS Program Coordinating Committee

The FSS Program is required to develop a Program Coordinating Committee (PCC) to coordinate services for FSS participants. The PCC meets on a quarterly basis and must have one representative of Columbia Housing, one HCV participant, and one public housing participant. The Columbia Housing PCC will also include representatives from community partner agencies and will play a vital role in providing support and bringing resources to the FSS Program. The FSS staff in

partnership with PCC members will work together to ensure that the program is operating in accordance with HUD regulations and the approved FSS Action Plan.

XXIII. The Columbia Housing Discretionary Policies

There are specific policies Columbia Housing will have discretion over pertaining to the FSS Program. Columbia Housing reserves the right to establish specific guidelines and policies relative to FSS operations and escrow disbursements.

- A. Columbia Housing may allow participants to withdraw funds from escrow accounts in order to complete goals in the C.O.P. and/or eliminating barriers. The maximum escrow interim disbursement will be 25% of the total balance of the account. Participants must complete a request for interim disbursement and provide documentation that the funds are needed in accordance with accomplishing goals in the ITSP. Columbia Housing may request that the participant provide three (3) quotes for disbursements related to activities such as, but not limited to, car repairs. It is the discretion of Columbia Housing to approve whether or not a participant will be able to withdraw funds from the account for specified activities.
- B. Columbia Housing reserves the right to deny a participant from re-enrolling in the FSS Program.
- C. Columbia Housing will determine completion of the “suitable employment” goal for FSS participants. Suitable employment will be based upon a number of factors to include increase in earned income from initial intake, benefits, employment status, length of employment, and stability of employment.

XXIV. Equal Opportunity

It is the policy of Columbia Housing that no person will experience discrimination because of race, color, creed, religion, sex national origin, age, disability or familial status in processing of the application, the issuance of certificates of Family Participation/Housing Vouchers, or any aspects of the Family Self-Sufficiency Program. Columbia Housing will comply with Federal, State, and Local equal opportunity laws and regulations and requirements pursuant thereto and make reasonable accommodations to persons with disabilities in order to ensure access to services provided by the program.

**HOUSING AUTHORITY OF THE
CITY OF COLUMBIA**
Columbia, South Carolina

AUDIT REPORT

For the Year Ended June 30, 2019

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

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June 30, 2019

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**Barton,
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Independent Auditor's Report

Board of Commissioners
Housing Authority of the City of Columbia
Columbia, South Carolina

We have audited the accompanying financial statements of the business-type activities and the aggregate discretely presented component units of the Housing Authority of the City of Columbia ("Authority") as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We did not audit the financial statements of Celia Saxon I, LP and Celia Saxon II, LP (two discretely presented component units combined with Lorick Place, LLC collectively referred to as the "Discrete Component Units"), which represent 5 percent, 5 percent, and 1 percent, respectively, of the assets, net position, and revenues of the Authority. Those financial statements were audited by other auditors whose reports have been furnished to us, and our opinion, insofar as it relates to the amounts included for the Discrete Component Units (for Celia Saxon I, LP and Celia Saxon II, LP), is based solely on the reports of the other auditors.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, based on our audit and the report of other auditors, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities and the aggregate discretely presented component units of the Housing Authority of the City of Columbia, as of June 30, 2019, and the changes in financial position and cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter

As discussed in Note 19 to the financial statements, the Housing Authority of the City of Columbia is a defendant in various lawsuits as the result of two individuals losing their lives to carbon monoxide poisoning at its Allen Benedict Court facility. Our opinion is not modified with respect to this matter.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 3 through 7 be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

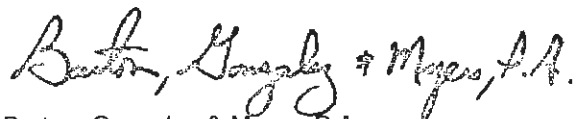
Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Housing Authority of the City of Columbia's basic financial statements. The accompanying financial information listed in the Table of Contents as Supplementary Information and the Financial Data Schedule are presented for additional analysis and are not a required part of the financial statements. The accompanying schedule of expenditures of federal awards, as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, is presented for purposes of additional analysis and is also not a required part of the financial statements.

This other information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the financial information listed in the Table of Contents as Supplementary Information, the Financial Data Schedule and the schedule of expenditures of federal awards are fairly stated in all material respects in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated February 24, 2020, on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.



Barton, Gonzalez & Myers, P.A.
Certified Public Accountants
February 24, 2020

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Management's Discussion and Analysis

June 30, 2019

This discussion and analysis of the Columbia's financial performance should be read in conjunction with the auditor's opinion letter and the financial statements.

Entity-Wide Statements

The combined financial statements show, in one place, all the Authority's operations. Our statements are prepared on the accrual basis of accounting, which is similar to that used by most businesses. Under this method, all revenues and expenses connected with the fiscal year are taken into account even if the cash involved has not actually been received or paid. The Financial Data Schedule included within the audit report contains all the programs of the Authority including the discretely presented component units that are excluded from this analysis.

Fund Statements

The Financial Data Schedule reports the Authority's operations in more detail. The Authority reports all its activities using Proprietary Fund types. These funds are used to show activities that operate more like commercial enterprises. The Financial Data Schedule is organized by the government Catalogue of Financial Domestic Assistance (CFDA) numbers.

Entity-Wide Financial Highlights

**Housing Authority of the City of Columbia
Comparative Statement of Net Position**

	2019	2018	Total Change
Current Assets	\$ 17,846,408	\$ 18,296,967	\$ (450,559)
Capital Assets	91,456,622	97,457,022	(6,000,400)
Other Non-current Assets	146,666	224,313	(77,647)
Deferred Outflow of Resources	2,046,469	2,483,134	(436,665)
Total Assets & Deferred Outflows	\$ 111,496,165	\$ 118,461,436	\$ (6,965,271)
Current Liabilities	\$ 5,065,739	\$ 4,914,778	\$ 150,961
Noncurrent Liabilities	36,910,099	36,040,007	870,092
Deferred Inflow of Resources	1,363,061	1,264,820	98,241
Total Liabilities & Deferred Inflows	43,338,899	42,219,605	1,119,294
Investment in Capital Assets	70,616,055	76,074,581	(5,458,526)
Restricted	1,227,944	1,138,769	89,175
Unrestricted	(3,686,733)	(971,519)	(2,715,214)
Total Net Position	68,157,266	76,241,831	(8,084,565)
Total Liabilities, Deferred Inflows & Net Position	\$ 111,496,165	\$ 118,461,436	\$ (6,965,271)

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Management's Discussion and Analysis

June 30, 2019

Items affecting the Statement of Net Position

As of June 30, 2019, Total Assets were \$111,496,165 which represents a decrease of \$6,965,271 from the \$118,461,436 balance as of June 30, 2018.

The Authority's current assets decreased \$450,559 which was primarily the result of the reduction in cash and investments of \$2,291,546 offset somewhat by a \$1,889,279 increase in accounts receivable due to higher amounts due from HUD (\$1,033,311) and higher receivables amounts owed to Business activities and CHAD due to development activities (\$705,977). Capital assets decreased by \$6,000,400 due to dispositions of \$3,365,835 (related to Allen Benedict and Gonzales Gardens) and depreciation expense \$6,297,318 offset by \$3,662,753 of additions.

The Authority's liabilities and deferred outflows increased \$1,119,294, primarily due to an increase in accounts payable (\$853,467), other current liabilities (\$130,148) and other accrued liabilities (\$489,518) offset somewhat by a decrease of \$541,874 of outstanding debt as described in detail in the notes to the financial statements.

Housing Authority of the City of Columbia
Comparative Statement of Revenues and Expenses
TABLE II

	<u>2019</u>	<u>2018</u>	<u>Total Change</u>
Tenant Revenue	\$ 7,131,963	\$ 6,540,202	\$ 591,761
Operating Subsidies	38,530,195	40,458,373	(1,928,178)
Capital Grants	2,332,079	1,052,734	1,279,345
Fraud Income	7,862	8,713	(851)
Interest Income	175,264	74,003	101,261
Other Income	466,967	726,448	(259,481)
Gain/(Loss) on dispositions	(2,501,697)	96,605	(2,598,302)
Total Revenue	<u>46,142,633</u>	<u>48,957,078</u>	<u>(2,814,445)</u>
Administrative	7,981,181	6,889,368	1,091,813
Tenant Services	2,047,658	858,119	1,189,539
Utilities	2,076,922	2,051,431	25,491
Maintenance	6,161,723	5,125,149	1,036,574
Insurance	476,978	502,145	(25,167)
Protective services	1,004,413	608,942	395,471
Interest expense	754,587	739,330	15,257
General	1,942,369	3,118,629	(1,176,260)
Casualty losses- Non-capitalized	27,330	(5,826)	33,156
Housing Assistance Payments	25,456,719	25,945,135	(488,416)
Depreciation	6,297,318	6,996,898	(699,580)
Total Expenses	<u>54,227,198</u>	<u>52,829,320</u>	<u>1,397,878</u>
Change in Net Position	(8,084,565)	(3,872,242)	(4,212,323)
Prior period adjustments	-	(7,031,253)	7,031,253
Beginning Net Position	76,241,831	87,145,326	(10,903,495)
Ending Net Position	<u>\$ 68,157,266</u>	<u>\$ 76,241,831</u>	<u>\$ (8,084,565)</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Management's Discussion and Analysis

June 30, 2019

Grant revenue was \$648,833 or 1.56% lower in FY2019 in relation to FY2018 and consisted of the following Federal Assistance:

	<u>2019</u>	<u>2018</u>
Public Housing Subsidy	\$ 8,484,172	\$ 8,475,401
Capital Projects Funds	3,655,066	2,168,852
Section 8 Housing Choice Vouchers & Community Development Block Grant	28,470,241	29,112,687
Summer Food Program, ROSS Program and FEMA Disaster Aid	252,795	159,069
NIP Other Government Grant (for 2018 - none for 2019)	-	1,595,098
	<u>\$40,862,274</u>	<u>\$41,511,107</u>

HUD provides subsidy for the Public Housing, the Housing Choice Voucher programs and the Capital Fund. The Authority receives additional funding for smaller grants. The Housing Choice Voucher funding decreased \$642,446 which represents a decrease of 2.2% due to decreased HAP expense and utilization of reserves. Public Housing funding increased \$8,771 over the prior year. The subsidy formula is comprised of rental income, occupancy, allowable utilities and a calculated expense level provided by HUD. Capital Grants are requisitioned from HUD to cover eligible capital expenditures. Capital Grants increased \$1,486,214 as compared to the prior year, due to more activity for the grant.

Administrative Expenses increased \$1,091,813 from \$6,889,368 in FY2018 to \$7,981,181 in FY2019. The most significant changes occurred in salary and benefits which were \$975,756 higher as Administrative Employee Benefits which accounted for \$644,737 of the increase primarily due to higher post-employment benefit expenses related to retiree health care and pensions while administrative salaries increased \$331,019 or 9%.

Tenant services expense increased \$1,189,539 due to the \$1,243,240 of relocation costs associated with the relocation of residents from Allen Benedict Court which was condemned by the City of Columbia during January 2019.

General expenses decreased \$1,176,260. This is mainly due to the higher non-capitalized demolition costs incurred in fiscal year 2018 due to demolition costs at Gonzales Gardens in relation to FY2019 expenses.

Financial expenses increased \$15,257. This is due to higher interest obligations in mortgage payable.

Maintenance and operations increased \$1,036,574. This is due mainly to the increase in contract costs of \$711,327 and higher maintenance material costs of \$ 274,125.

Housing Assistance Payments decreased from \$25,945,135 to \$25,456,719, a decrease of \$488,416 due to lower utilization in relation to Fiscal 2018 levels as the Authority was in a shortfall position in Calendar 2018 and had to dramatically reduce leasing as a result.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Management's Discussion and Analysis

June 30, 2019

Depreciation expense was \$699,580 lower than in FY2018 due to reductions of assets in service due to Allen Benedict Court and Gonzales Gardens being taken offline.

Entity Wide Capital Assets

Housing Authority of the City of Columbia
Comparative Statement of Capital Assets

	<u>2019</u>	<u>2018</u>	<u>Total Change</u>	<u>% Change</u>
Land	\$ 15,907,226	\$ 16,939,407	\$ (1,032,181)	-6.09%
Buildings & improvements	170,431,236	172,123,070	(1,691,834)	-0.98%
Equipment	1,865,460	1,706,253	159,207	9.33%
Construction in progress	263,219	3,626,698	(3,363,479)	-92.74%
	188,467,141	194,395,428	(5,928,287)	-3.05%
Accumulated Depreciation	(97,010,519)	(96,938,406)	(72,113)	0.07%
Total Capital Assets	\$ 91,456,622	\$ 97,457,022	\$ (6,000,400)	-6.16%

A summary of changes in Capital Asset balances consisted of the following:

Summary of Capital Activities

Balance per prior audit	97,457,022
Capital Fund improvements	2,332,079
Additions - operations	393,591
Component Unit - TS Martin Improvements	474,081
Business Activities -Yorketown Additions	157,061
Business Activities -Purchase of Carter street	305,941
Net disposals - Allen Benedict Court	(1,703,980)
Net disposals - Gonzales gardens	(323,147)
Net disposals - Lorick Place	(1,338,708)
Depreciation	(6,297,318)
Ending Balance @ 06/30/219	91,456,622

DEBT ADMINISTRATION:

Capital Lease Obligation:

The Authority entered into a master equipment lease purchase agreement to finance energy improvements being made to Public Housing units. Such agreements are, in substance, purchases (capital leases) and are reported as capital lease obligations. All leased equipment is included in depreciable capital assets and is to be depreciated over 15 years. The balance of the lease was \$2,704,167.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Management's Discussion and Analysis

June 30, 2019

Notes Payable:

For the year ended June 30, 2019, the Authority had the following changes in its long-term notes payable:

Balance at June 30, 2018	\$ 18,588,274
Principal additions	1,604,888
Principal retirements	<u>(2,056,762)</u>
Balance at June 30, 2019	18,136,400
Less current maturities	<u>(1,071,069)</u>
 Balance at June 30, 2019, net of current portion	 <u>\$ 17,065,331</u>

The details of these notes are described in depth in the Notes to the Financial Statements which should be read in conjunction with this report.

ECONOMIC FACTORS AND EVENTS AFFECTING OPERATIONS:

Several factors may affect the financial position of the Authority in the subsequent fiscal year. These factors include:

- (1) The Unemployment Rate for the City of Columbia, South Carolina as of June 30, 2019 was 3.5%.¹
- (2) The median household income, per the 2018 census data, was \$43,650.²
- (3) The level of Federal funding for both Public Housing and the Housing Choice Voucher programs continue to be at prorated levels that are significantly below formula eligibility amounts.
- (4) Fuel prices and other inflationary pressures are expected to increase supplies and other costs.

CONCLUSIONS:

While the overall financial performance was difficult in FY 2019, the Authority continues to restructure its operations to ensure that it is operated in a fiscally prudent manner. Since the Authority relies so heavily on the funding received from HUD, consistent underfunding has contributed to an environment whereby Management will need to evaluate its portfolio in order to ensure that the agency remains viable. The Agency is also committed to staying abreast of regulations and appropriations as well as maintaining an ongoing analysis of all budgets and expenses to ensure that the Authority continues to operate at the highest standards established by the Real Estate Assessment Center and the Department of Housing and Urban Development.

This financial report is designed to provide our residents, the citizens of Richland County, South Carolina, all federal and state regulatory bodies, and any creditors with a general overview of the Authority's finances. If you have any questions regarding these financial statements or supplemental information, you may contact Ivory Matthews, Interim Executive Director, by writing: Housing Authority of the City of Columbia, 1917 Harden St., Columbia, SC 29204.

1 Bureau of Labor Statistics Data website www.bls.gov

2 Census Bureau website www.census.gov

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

STATEMENT OF NET POSITION - PROPRIETARY FUND TYPE

	Primary Government June 30, 2019	Discrete Component Dec 31, 2018	Totals (Memorandum Only)
ASSETS AND DEFERRED OUTFLOWS OF RESOURCES			
<u>Current Assets</u>			
Cash and cash equivalents - unrestricted	\$ 2,564,204	\$ 312,108	\$ 2,876,312
Cash and cash equivalents - restricted	1,794,872	1,214,866	3,009,738
Investments - unrestricted	9,937,969	-	9,937,969
Accounts receivable	2,565,595	7,587	2,573,182
Prepaid expenses	276,176	1,364	277,540
Inventories	225,972	-	225,972
Assets held for sale	481,620	-	481,620
	<u>17,846,408</u>	<u>1,535,925</u>	<u>19,382,333</u>
Total Current Assets			
<u>Noncurrent Assets</u>			
Notes receivable	146,666	-	146,666
Other assets	-	9,237	9,237
	<u>146,666</u>	<u>9,237</u>	<u>155,903</u>
Total Other Noncurrent Assets			
Capital Assets:			
Land & Improvements	15,907,226	1,023,640	16,930,866
Buildings	170,431,236	7,129,728	177,560,964
Furniture & equipment	1,865,460	232,995	2,098,455
Construction in progress	263,219	2,181,953	2,445,172
	<u>188,467,141</u>	<u>10,568,316</u>	<u>199,035,457</u>
Less: Accumulated depreciation	(97,010,519)	(2,996,856)	(100,007,375)
Total Capital Assets	<u>91,456,622</u>	<u>7,571,460</u>	<u>99,028,082</u>
Total Noncurrent Assets	<u>91,603,288</u>	<u>7,580,697</u>	<u>99,183,985</u>
TOTAL ASSETS	<u>\$ 109,449,696</u>	<u>\$ 9,116,622</u>	<u>\$ 118,566,318</u>
<u>Deferred Outflows of Resources</u>	<u>2,046,469</u>	<u>-</u>	<u>2,046,469</u>
TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES	<u>\$ 111,496,165</u>	<u>\$ 9,116,622</u>	<u>\$ 120,612,787</u>

See auditor's report.

The notes to the financial statements are an integral part of this statement.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

STATEMENT OF NET POSITION - PROPRIETARY FUND TYPE

	Primary Government June 30, 2019	Discrete Component Dec 31, 2018	Totals (Memorandum Only)
LIABILITIES, DEFERRED INFLOWS OF RESOURCES AND NET POSITION			
<u>Current Liabilities</u>			
Accounts payable and accrued liabilities	\$ 1,900,591	\$ 438,354	\$ 2,338,945
Accrued compensated absences	456,214	-	456,214
Unearned revenue	263,239	3,799	267,038
Current portion of capital lease obligation	100,000	-	100,000
Long term debt - current portion	1,071,069	67,319	1,138,388
Other current liabilities	676,813	307,554	984,367
Tenant security deposits	597,813	29,118	626,931
	<u>5,065,739</u>	<u>846,144</u>	<u>5,911,883</u>
Total Current Liabilities			
<u>Noncurrent Liabilities</u>			
Long-term portion of capital lease obligation	2,604,167	-	2,604,167
Long term debt, net of current portion	17,065,331	3,173,969	20,239,300
Accrued compensated absences	152,072	-	152,072
Other noncurrent liabilities	225,108	-	225,108
OPEB liability	6,561,482	-	6,561,482
Pension liability	10,301,939	-	10,301,939
	<u>36,910,099</u>	<u>3,173,969</u>	<u>40,084,068</u>
Total Noncurrent Liabilities			
TOTAL LIABILITIES	<u>41,975,838</u>	<u>4,020,113</u>	<u>45,995,951</u>
<u>Deferred Inflows of Resources</u>	<u>1,363,061</u>	<u>-</u>	<u>1,363,061</u>
<u>Net Position</u>			
Net investment in capital assets	70,616,055	4,330,172	74,946,227
Restricted	1,227,944	1,185,748	2,413,692
Unrestricted	(3,686,733)	(419,411)	(4,106,144)
	<u>68,157,266</u>	<u>5,096,509</u>	<u>73,253,775</u>
TOTAL NET POSITION			
TOTAL LIABILITIES, DEFERRED INFLOWS OF RESOURCES AND NET POSITION	<u>\$ 111,496,165</u>	<u>\$ 9,116,622</u>	<u>\$ 120,612,787</u>

See auditor's report.

The notes to the financial statements are an integral part of this statement.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

**STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN FUND
NET POSITION - PROPRIETARY FUND TYPE**

	Primary Government Year Ended June 30, 2019	Discrete Component Year Ended Dec 31, 2018	Totals (Memorandum Only)
<u>Operating Revenues</u>			
Dwelling rent	\$ 7,131,963	\$ 490,944	\$ 7,622,907
Governmental grants & subsidy	38,530,195	-	38,530,195
Other income	474,829	-	474,829
Total Operating Revenues	46,136,987	490,944	46,627,931
<u>Operating Expenses</u>			
Administration	7,981,181	122,799	8,103,980
Tenant services	2,047,658	478	2,048,136
Utilities	2,076,922	3,260	2,080,182
Maintenance & operations	6,189,053	103,069	6,292,122
Protective services	1,004,413	-	1,004,413
General expense	2,419,347	58,951	2,478,298
Housing assistance payments	25,456,719	-	25,456,719
Depreciation & amortization	6,297,318	217,097	6,514,415
Total Operating Expense	53,472,611	505,654	53,978,265
Net Operating Income/(Loss)	(7,335,624)	(14,710)	(7,350,334)
<u>Nonoperating Revenues/(Expenses)</u>			
Investment income	175,264	54	175,318
Interest expense	(754,587)	(116,043)	(870,630)
Gain/(Loss) on sale of assets	(2,501,697)	-	(2,501,697)
Net Nonoperating Revenues/(Expenses)	(3,081,020)	(115,989)	(3,197,009)
Net Loss before capital grants / contributions	(10,416,644)	(130,699)	(10,547,343)
Capital grants / contributions	2,332,079	1,107,906	3,439,985
Increase/(Decrease) in Net Position	(8,084,565)	977,207	(7,107,358)
Total Net Position, beginning	76,241,831	4,119,302	80,361,133
Total Net Position, ending	\$ 68,157,266	\$ 5,096,509	\$ 73,253,775

See auditor's report.

The notes to the financial statements are an integral part of this statement.

**Housing Authority of the City of Columbia
Columbia, South Carolina**

Statement of Cash Flows - Proprietary Fund Type

For the Year Ended June 30, 2019

	<u>Primary Government</u>
<u>Cash flows from operating activities:</u>	
Cash received from tenants and others	\$ 6,691,725
Cash from operating grants and subsidies	38,495,496
Cash paid for goods and services	(13,482,049)
Housing assistance payments	(25,456,719)
Cash paid to employees for services	(6,081,134)
Net cash provided by operating activities	<u>167,319</u>
<u>Cash flows from capital and related financing activities:</u>	
Proceeds from capital grants	1,453,279
Proceeds from borrowing of debt	1,157,896
Principal paid on debt	(2,156,832)
Net proceeds from sale of capital assets	653,859
Net acquisition of capital assets	(2,995,412)
Interest paid on debt	(722,187)
Net cash used by capital and related financing activities	<u>(2,609,397)</u>
<u>Cash flows from investing activities:</u>	
Interest on investments	131,799
Purchase of investments, net	(4,093,137)
Proceeds from sale of assets held for sale	18,733
Net cash flows used by investing activities	<u>(3,942,605)</u>
Net decrease in cash and cash equivalents	(6,384,683)
Cash and cash equivalents, beginning of year	<u>10,743,759</u>
Cash and cash equivalents, end of year	<u><u>\$ 4,359,076</u></u>

See auditor's report.

The notes to the financial statements are an integral part of this statement.

**Housing Authority of the City of Columbia
Columbia, South Carolina**

Statement of Cash Flows - Proprietary Fund Type

For the Year Ended June 30, 2019

	<u>Primary Government</u>
Reconciliation of operating loss to net cash provided from operating activities:	
Operating loss:	\$ (7,335,624)
Adjustments to reconcile operating loss to net cash provided by operating activities:	
Depreciation	6,297,318
Increase in receivables	(889,367)
Decrease in inventory	55,165
Increase in prepaid expenses	(25,606)
Increase in accounts payable, accrued liabilities and security deposits	1,566,819
Decrease in unearned revenue and other liabilities	(117,878)
Increase in accrued compensated absences	59,696
Increase in pension and OPEB liability and related deferred outflows and deferred inflows of resources	556,796
Total adjustments	<u>7,502,943</u>
Net cash provided by operating activities	<u>\$ 167,319</u>
<u>Supplemental Disclosure of Noncash Capital and Related Financing Activities:</u>	
Purchase of fixed assets financed with notes payable at June 30, 2019	<u>\$ 457,062</u>

See auditor's report.

The notes to the financial statements are an integral part of this statement.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies:

Introduction

The financial statements of the Authority have been prepared in conformity with generally accepted accounting principles (GAAP). The Authority has adopted the provisions of GASB Statement No. 62, *"Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements."* The objective of this Statement is to incorporate the GASB's authoritative literature and certain FASB and American Institute of Certified Public Accountants' ("AICPA") accounting and financial reporting guidance issued on or before November 30, 1989, which does not conflict with or contradict GASB pronouncements.

GASB Statement No. 62 also supersedes Statement No. 20, *Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities that Use Proprietary Fund Accounting*, thereby eliminating the election provided in that Statement for enterprise funds and business-type activities to apply post-November 30, 1989 FASB pronouncements that do not conflict with or contradict GASB pronouncements. However, those entities can continue to apply, as other accounting literature, post-November 30, 1989 FASB pronouncements that do not conflict with or contradict GASB pronouncements, including this Statement. The more significant of the government's accounting policies are described below.

Organization

The Housing Authority of the City of Columbia ("The Authority") is a public body and a body corporate and politic organized under the laws of the State of South Carolina by the City of Columbia for the purpose of providing adequate housing for qualified low-income individuals. To accomplish this purpose, the City appoints a Governing Board, but the Board designates its own management. Additionally, the Authority has entered into annual contribution contracts with the U. S. Department of Housing and Urban Development ("HUD") to be the administrator of the housing and housing related programs described herein.

Reporting Entity

PRIMARY GOVERNMENT

In determining how to define the reporting entity, management has considered all potential component units by applying the criteria set forth in Section 2100 and 2600 of the *Codification of Government Accounting Standards Board and Financial Accounting Standards Board and Statement Number 14 of the Government Accounting Standards Board, the Financial Reporting Entity*.

Financial Accountability - The Authority is responsible for its debts, does not impose a financial burden on the City of Columbia and is entitled to all surpluses. No separate agency receives a financial benefit nor imposes a financial burden on the Authority.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Reporting Entity (Continued)

Appointment of a Voting Majority - The Authority is governed by a Board of Commissioners appointed by the City of Columbia and has governance responsibilities over all activities related to all housing activities within the City of Columbia. The Board of Commissioners has decision making authority and the power to designate management. The members do not serve at the discretion of the City; i.e., they can be removed only for cause. The Authority's Board elects its own chairperson.

Imposition of Will - The City has no influence over the management, budget, or policies of the Authority. The Authority's Board of Commissioners has the responsibility to significantly influence the Authority's operations. This includes, but is not limited to, adoption of the budget, personnel management, sole title to, and residual interest in all assets (including facilities and properties), signing contracts, issuing bonds, and deciding which programs are to be provided.

On the basis of the application of these criteria, the Authority is a legally separate entity that is fiscally independent of other governments, and there are no other entities that are to be reported as a component unit of the Authority, except for the Columbia Housing Authority Development, Inc. which is considered to be a blended component unit. Also, the Authority is not to be included in the City of Columbia financial reports therefore, the Authority reports independently. During the review of the Authority's budgets, annual contributions contract, minutes of the Board of Commissioner's meetings, cash receipts and cash disbursements for the reporting period disclosed that the Authority operated the following programs:

Public Housing Agency Owned Housing Program - Funding for public housing authorities is received from the United States Department of Housing and Urban Development (HUD) and from participants in public housing programs. Under the Low Rent Housing Program, low income tenants pay monthly rents which are determined by their need for assistance. This program (referred to in the general purpose financial statements as PHA Owned Housing) is designed to provide low-cost housing within the City of Columbia and Richland County. Funding is provided by eligible residents who are charged monthly rent based on family size, family income, and other determinates, as well as by subsidies provided by HUD. HUD pays operating subsidies to the housing authority to enable the authority to maintain the low-income character of the neighborhood while providing adequate services and maintaining adequate reserves.

Capital Fund Program - The purpose of the capital fund program is to provide another source of funding to cover the cost of physical and management improvements and rehabilitation on existing low-income housing and upgrading the program. Funding for this program is provided by grants from HUD through a formula driven computation. The grant funding is consolidated with the Public Housing in the year end detailed reports. Each year's grant funds must be entirely obligated within two years of inception of the grant and entirely expended within four years.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Reporting Entity (Continued)

Resident Opportunities and Supportive Services Program - The Authority administers this support services program to provide reliable transportation for all elderly and disabled residents of the Housing Authority of the City of Columbia and to contract for housekeeping and personal assistance for residents who meet certain criteria. Funding for this program is provided by grants from HUD.

Housing Opportunities for Persons with AIDS (HOPWA) - The HOPWA program is a Federal program dedicated to addressing the housing needs of persons living with HIV/AIDS and their families. The Authority provides housing and support to these beneficiaries. Funding for this program is provided by grants from HUD.

Housing Choice Voucher Program, Mainstream Vouchers, Moderate Rehab Program & Disaster Vouchers - Section 8 of the Housing and Community Development Act of 1974 provides subsidies ("Housing Assistance Payments") on behalf of lower-income families to participating housing owners. Under this program, the landlord-tenant relationship is between a housing owner and a family rather than the Authority and a family as in other low-income housing programs. For existing housing, and in some cases in new construction and substantial rehabilitation, HUD contracts with the Authority to enter into contracts with owners to make assistance payments for the difference between the approved contract rent and the actual rent paid by the lower-income families. With regard to new or substantially rehabilitated housing under the Housing Assistance Payments Program, the Authority may also be the owner-developer.

Business Activities - This program mainly operates to facilitate the acquisition, construction and sale of affordable housing to certain qualified individuals. In addition this program provides assistance to the HOPE VI & public housing objectives to provide decent, safe and sanitary housing for qualified individuals.

Blended Component Units -

Columbia Housing Authority Development, Inc. (CHAD) - This is a nonprofit corporation set up using a Board of Directors controlled by the Columbia Housing Authority. The purpose of this corporation is to acquire, construct and manage property within the jurisdiction of the Authority, to perform contractual services in the field of housing management, and to assist in providing housing for low and moderate income purposes.

South Carolina Affordable Housing Initiative, Inc. (SCAHI) - This is a nonprofit corporation set up using a Board of Directors controlled by the Columbia Housing Authority. The purpose of this corporation is a second development arm to acquire, construct and manage property within the jurisdiction of the Authority, to perform contractual services in the field of housing management, and to assist in providing housing for low and moderate-income purposes.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Reporting Entity (Continued)

DISCRETE COMPONENT UNITS

The Columbia Housing Authority Development, Inc. ("CHAD"), a blended component unit of the Authority, is the general partner in three real estate partnerships. As the general partner CHAD has certain rights and responsibilities which enable it to impose its will on the partnerships. Neither the Authority nor CHAD are served exclusively or almost exclusively by the partnerships. Therefore, the partnerships are presented as discretely presented component units. The discretely-presented financial statements include the operations of three entities, Celia Saxon I, LP, Celia Saxon II, LP and Lorick Place LLC, collectively known as the "Partnerships" or "DCU". The discretely presented components have a calendar year end of December 31st and as such the balances between the Authority and the discretely presented component units may not agree due to timing differences.

Celia Saxon I, LP (CS1) was organized on January 31, 2003 for the purpose of developing, constructing, owning and operating a 39-unit low-income housing complex (the "Project") located on a 2.44-acre leased parcel within the former Saxon Homes site in Columbia, South Carolina. The Project was completed and began rental operations in October 2005. The Company shall continue in existence until December 31, 2053 unless otherwise modified in accordance with the partnership agreement. The ownership of CS1 is as follows: Managing member, Columbia Housing Authority Development, Inc., ("CHAD")- (0.01%) and Investor member: The Housing Outreach Fund IX Limited Partnership (99.99%). The Project received an allocation of low-income housing tax credits from the South Carolina Housing Finance Development Authority under Section 42 of the Internal Revenue Code of 1986, as amended.

Celia Saxon II, LLC (CS2) was organized on February 24, 2004 for the purpose of developing, constructing, owning and operating a 32-unit low-income housing apartment complex for the elderly (the "Project") located in Richland, South Carolina. The Project began rental operations in June 2006. The ownership of CS2 is as follows: Managing member, Columbia Housing Authority Development, Inc. ("CHAD")- (0.01%) and Investor member: Community Equity Fund XI Limited Partnership(99.99%).

Lorick Place, LLC (LP) was organized on October 6, 2014 for the purpose of developing, constructing, owning and operating an 87-unit low-income housing apartment complex located in Columbia, South Carolina. As of December 31, 2018, the project was under construction and it is expected to begin rental operations during the Spring of 2020. The ownership of LP is as follows: Managing member, Columbia Housing Authority Development, Inc. (0.01%) and Investor member: PNC Bank, National Association (99.99%).

The above discretely presented component unit separately issued financial statements (for Celia Saxon I, LP and Celia Saxon II, LLC) can be obtained from the Authority. See also summary financial statement information for the discretely presented component units at Note 24.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Basis of Presentation

The Authority accounts for its operation in one fund type, the enterprise fund, that reflects the business type activities of the Authority. An enterprise fund is used to account for operations (a) that are financed and operated in a manner similar to private business enterprises where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenue earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability, or other purposes. The Housing Authority of the City of Columbia maintains one enterprise fund.

Basis of Accounting

The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. The enterprise fund is accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and all liabilities associated with the operation of this fund are included on the statement of net position. Enterprise fund type equity (i.e., net total position) is segregated into net investment in capital assets, and restricted and unrestricted net position components. Operating activities for this fund present increases (e.g., revenues) and decreases (e.g., expenses) in net total position.

The financial statements for the Authority have been presented on the accrual basis. Under this basis, revenues are recorded when earned and expenses are recorded when incurred. Operating income reported includes rental income, other tenant charges, operating grants and other revenue for the continuing operations of the fund. Operating expenses are the costs of providing goods and services. Other revenues and expenses are classified as non-operating in the financial statements.

Budgetary Data

The Authority maintains budgetary controls over its fund, as required by the terms of the Authority's annual contributions contract with HUD. The Authority adopts budgets on the basis of accounting consistent with the basis of accounting for the fund to which the budget applies. The Authority prepares annual operating budgets, which are formally adopted by its Governing Board of Commissioners. The budgets for programs funded by HUD form the basis of the Federal Financial Assistance received through HUD.

Subsidies

Subsidies received from the Department of Housing and Urban Development or other grantor agencies, for operating purposes, are recorded as operating revenue in the operating statement while capital grant funds are treated as an increase to net position after net income or loss. The operating grant revenue is offset by the operating expenses in the financial statements.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Cash and Investments

The Authority's cash and cash equivalents are considered to be cash on hand, demand deposits, and short-term investments with an original maturity of three months or less when purchased. Investments are stated at fair value, except for U. S. Treasury Bills, which are reported at amortized cost. The Authority reports all money market investments having a remaining maturity at time of purchase of one year or less at amortized cost. Investment securities are normally held to mature at par value and adjustments are made to the investment portfolio to reflect increases/ (decreases) in gains made. As required by the annual contributions contract, the Authority prepares cash forecasts for each program to determine the amount of funds available for investment and to maximize investment earnings.

Inventories

Inventories are recorded at average cost. The consumption method is used to account for inventories. Under the consumption method, inventories are charged to expense when consumed.

Capital Assets

Capital assets are stated at historical cost. Donated capital assets are stated at their fair value on the date donated. This includes site acquisition and improvement, structures and equipment. All infra-structure assets were capitalized at the conclusion of development then dedicated to the City of Columbia for maintenance and repairs. Depreciation of exhaustible capital assets is charged as an expense against operations, and accumulated depreciation is normally reported on the proprietary funds' Statement of Net Position.

The estimated useful lives for each major class of depreciable capital assets are as follows:

Buildings & Improvements	10 – 30 years
Furniture, fixtures & equipment	5 – 10 years

Capitalization of Interest

Interest costs relating to the capital lease obligation are capitalized during the construction period relating to the construction of building improvements, net of interest earned on the investment of funds borrowed for construction. Construction was completed in a prior period and as such, interest costs totaling \$-0- were capitalized during the year. Interest charged to expense relating to capital lease obligations was \$54,847.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Unearned Revenue

Unearned revenues consist of low-income housing program payments from HUD that have been drawn in advance according to their operating subsidy agreement and rental income received in advance from tenants.

Pensions

For purposes of measuring the net pension liability, deferred outflows of resources and deferred inflows of resources related to pensions, and pension expense, information about the fiduciary net position of the South Carolina Retirement System (SCRS) and additions to/deductions from SCRS's fiduciary net position have been determined on the same basis as they are reported by SCRS. For this purpose, benefit payments (including refunds of employee contributions) are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

Insurance

The primary technique used for risk financing is the purchase of insurance policies from commercial insurers that include a large deductible amount. The coverage of the insurance is at 80% of the estimated fair value of the property, and should losses occur, the portion of the uninsured loss is not expected to be significant with respect to the financial position of the Authority. The Authority secures required insurance coverage through State of South Carolina policies which is more competitive than regional vendors can offer for the identical coverage.

Compensated Absences

Compensated absences are absences for which, employees will be paid; i.e., sick leave, vacation, and other approved leaves. In accordance with GASB Statement No.16, *Accounting for Compensated Absences*, the Authority accrues the liability for those absences that the employee has earned the rights to the benefits. Accrued amounts are based on the current salary rates. Full time, permanent employees are granted vacation and sick leave benefits in varying amounts to specified maximums depending on tenure with the Authority. Vacation pay is recorded as an expense and related liability in the year earned.

Collection Losses

Collection losses on accounts receivable are expensed, in the appropriate Fund, using the allowance method.

Income Taxes

The Housing Authority of the City of Columbia is a Quasi-governmental entity. The Authority is not subject to Federal or State income taxes.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Net Position

Net Investment in Capital Assets represents funds received for development and modernization of the Authority's dwelling units. Capital assets purchased through operations and grant programs are included in this amount.

Restricted Net Position represents the difference between the assets and liabilities that are constrained in use by creditors or by grantors, contributors, or laws or regulations of governments. The Authority's restricted net position is comprised of cash and other assets (net of related liabilities) that are held in the various program accounts. As of June 30, 2019, the Authority's restricted net position was comprised of the following:

<u>Restricted net position (Primary Government):</u>	
Mainstream Voucher program equity	\$ 99,127
CDBG program	766,980
Business Activities	116,829
Continuum of Care program	245,008
	<u>\$ 1,227,944</u>

Unrestricted Net Position represents the difference between the Authority's assets and liabilities that are not classified as net investment in capital assets or as restricted net position.

Estimates

The preparation of the financial statements in conformity with accounting principles generally accepted in the United States requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results may differ from those estimates.

New Pronouncements

During fiscal year 2019, the Housing Authority of the City of Columbia did not implement any GASB Pronouncements impacting financial statement presentation.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Significant Accounting Policies for the Discrete Component Units

The following is a summary of significant accounting policies consistently applied in the preparation of these financial statements for the discrete component units:

Basis of Accounting

The financial statements of the Partnerships are prepared on the accrual basis of accounting and in accordance with generally accepted accounting principles.

Income Taxes

Earnings of the Partnerships are taxed directly to the members/partners; accordingly, the accompanying financial statements do not reflect a provision or liability for federal and state income taxes.

Rental Property

Rental property is stated at cost. Depreciation is provided for in amounts sufficient to relate the cost of depreciable assets to operations over their estimated useful lives under the straight-line method. The estimated lives used in determining depreciation are:

Land improvements	20 years
Buildings	40 years
Furnishings and equipment	7-10 years

Improvements are capitalized, while expenditures for maintenance and repairs are charged to expense as incurred.

Rental Income

Rental income is recognized as rentals become due. Rental payments secured in advance are deferred until earned. All leases between the Partnerships and the tenants of the property are operating leases.

Cash and Cash Equivalents

For purposes of the statement of cash flows, the Partnerships considers all unrestricted, highly liquid investments with an initial maturity of three months or less to be cash equivalents.

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 1: Summary of Significant Accounting Policies: (Continued)

Significant Accounting Policies for the Discrete Component Units (Continued)

Impairment of Long-Lived Assets

The Partnerships review its long-lived assets for impairment whenever events or changes in circumstances indicate that the carrying value may not be recoverable. Recoverability is measured by a comparison of the carrying amount to the future net undiscounted cash flow expected to be generated and any estimated proceeds from the eventual disposition. If the long-lived asset is considered to be impaired, the impairment to be recognized is measured at the amount by which the carrying amount exceeds the fair value as determined from an appraisal, discounted cash flows analysis, or other valuation technique. No impairment losses were recognized during 2018.

Accounts Receivable and Bad Debts

Tenant receivables are charged to bad debt expense when they are determined to be uncollectible based upon a periodic review of the accounts by management. Accounting principles generally accepted in the United States of America require that the allowance method be used to recognize bad debts; however, the effect of using the direct write-off method is not materially different from the results that would have been obtained under the allowance method.

Other Assets

Deferred tax credit fees are being amortized over 15 years.

Concentrations of Credit Risk

The Partnerships maintain their cash in financial institutions insured by the Federal Deposit Insurance Corporation (FDIC). Deposit accounts, at times, may exceed federally insured limits. The Partnerships have not experienced any losses in such accounts and believes they are not exposed to any significant credit risk on cash and cash equivalents.

Debt Issuance Costs

Loan costs are being amortized to interest expense over the life of the related loan.

Subsequent Events Evaluation

The Celia Saxon I, LP and Celia Saxon II, LLC evaluated the effect subsequent events would have on the financial statements through April 23, 2019, which is the date the financial statements for were available to be issued.

NOTE 2: Stewardship, Compliance, and Accountability

The Authority believes it has met its responsibilities regarding stewardship, compliance and accountability for its fund.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 3: Cash and Investments

All the deposits of the Housing Authority of the City of Columbia are either insured or collateralized by using the Dedicated Method whereby all deposits that exceed the federal depository insurance coverage level are collateralized with securities held by the Authority's agents in these units' names. The Housing Authority of the City of Columbia has no policy regarding custodial credit risk for deposits. At June 30, 2019, the Authority's deposits had a carrying amount of \$14,297,045 and bank balances of \$14,648,918. Of the bank balances held in various financial institutions, \$4,284,716 was covered by federal depository insurance and the remainder was covered by collateral held under the dedicated method. At June 30, 2019, the Authority's petty cash/change funds totaled \$3,900.

Investments - At June 30, 2019, the Authority's investment balances were as follows:

Certificates of deposit < 90 days	\$ 225,000
Certificates of deposit > 90 days	3,107,782
US Government obligations	<u>6,605,187</u>
Total	<u>\$9,937,969</u>

Interest rate risk- As a means of limiting its exposure to market value losses arising from rising interest rates, the Authority typically limits its investment portfolio to maturities of 24 months or less. The Housing Authority of the City of Columbia has no specific policy regarding interest rate risk.

Credit risk - The Authority has no policy regarding credit risk.

Custodial credit risk - For an investment, the custodial risk is the risk that in the event of the failure of the counterparty, the Authority will not be able to recover the value of its investments or collateral securities that are in the possession of an outside party. The Authority has no policy on custodial credit risk.

Collateral Credit Risk - The Authority places no limit on the amount that it may invest in any one issuer. Currently, the Authority has 22% held at BB&T, 7% held at Security Federal, 45% held at First Citizens, 2% held at South State Bank, 1% at Bank of the Ozarks, 1% held at Ameris Bank, 14% held in Multi-Bank Securities, 1% at Woodforest Bank, and 4% at First Community Bank as of June 30, 2019. The Authority has no policy regarding collateral credit risk.

Cash and investments at June 30, 2019 were as follows:

Checking and money market accounts	\$ 4,083,887
Certificates of deposit - greater than 90 days	3,107,782
Certificates of deposit - less than 90 days	225,000
Savings accounts	271,289
US Government obligations	6,605,187
Petty cash/change funds	<u>3,900</u>
	<u>\$ 14,297,045</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 3: Cash and Investments (Continued)

Restricted Cash and Investments: Of the amounts listed above, the following are considered to be restricted cash and investments:

HAP equity (including Disaster HAP of \$88,692)	\$ 103,063
Mainstream Voucher equity	99,127
CDBG program funds	284,401
Continuum of Care funds	216,270
Escrow accounts - EPC	152,261
FSS escrows	225,108
Business activities	116,829
Tenant security deposits	597,813
	<u>\$ 1,794,872</u>

Collateralization: As of June 30, 2019, the following securities were pledged as collateral to secure the deposits of the Housing Authority of the City of Columbia:

<u>Security</u>	<u>Cusip</u>	<u>Maturity Date</u>	<u>Interest Rate</u>	<u>Market Value</u>
<i>FHL Bank of Atlanta (Synovus Bank)</i>				
FNMA MORTPASS	31418CFF6	1/1/2037	2.5000%	950,000
				<u>\$ 950,000</u>
<i>FHL Bank of Atlanta (Security Federal Bank)</i>				
SBA SBLPT	83165A4T8	8/25/2042	0.0000%	\$ 850,000
				<u>\$ 850,000</u>
<i>SunTrust Bank (First Community Bank)</i>				
FHLMC REMIC	3137BLMZ8	7/25/2025	3.0100%	\$ 1,015,652
				<u>\$ 1,015,652</u>
<i>BB&T</i>				
FGRA	3137AWZG3	12/15/2042	1.750%	\$ 2,579,570
FNMS	3138WHM66	7/1/2046	3.000%	1,644,221
FGPC	313707DTL0	8/1/2028	2.500%	365,795
FNRM	3136ATHU1	3/25/2046	3.000%	261,947
FNMS	3138WHM66	7/1/2046	3.000%	627,654
				<u>\$ 5,479,187</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 3: Cash and Investments (Continued)

DISCRETE COMPONENT UNITS – the discrete component units have the following restrictions on cash:

Celia Saxon I, LP (CS1) –

Operating Reserve Funding The partnership agreement and loan agreement with First Citizens Bank requires the Partnership to fund an operating reserve account in the amount of \$60,000 using capital contributions received from the limited partner. In addition, the general partner shall fund the operating reserve from net cash flow in order to maintain, to the extent possible, a balance at all times of at least \$60,000 or such greater amounts as set forth in the projections. The general partner must obtain the permission of ESIC to use the operating reserve. The operating reserve shall be maintained throughout the term of the Partnership. An analysis of the reserve for the year ended December 31, 2018 is as follows:

Balance, beginning	\$ 65,004
Interest earned	<u>41</u>
Balance, ending	<u>\$ 65,045</u>

Replacement Reserve Funding A replacement reserve of \$250 per unit per year, increasing at 3% annually, is to be funded initially in the amount and at the times shown in the projections and thereafter in the amounts and at the times shown in the budgets. The Partnership shall utilize amounts in the replacement reserve to fund major repairs, capital expenditures and replacement of capital items in the Project. The Partnership may not utilize the replacement reserve for any capital expenditure costing \$5,000 or more unless the Partnership has obtained the consent of the limited partner to make such expenditure. Expenditures exceeding \$5,000 must be approved by the ESIC. The replacement reserve shall be deposited in an interest-bearing account in a bank designated by the limited partner. Interest earned on the replacement reserve shall be added to the replacement reserve. Upon any sale of the Project, amounts in the replacement reserve shall be utilized to make capital expenditures, repairs or improvements in connection with such sale. An analysis of the replacement reserve for the year ended December 31, 2018 is as follows:

Balance, beginning	\$ 47,837
Funding, net	8,880
Withdrawals	<u>(2,676)</u>
Balance, ending	<u>\$ 54,041</u>

At December 31, 2018, the reserve is underfunded by approximately \$23,500.

Other Restricted Cash In addition to the above restricted operating reserve and replacement reserve, Celia Saxon I, LP also has \$17,147 of restricted tenant security deposits as well as \$14,327 in restricted tax and insurance escrows.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 3: Cash and Investments (Continued)

DISCRETE COMPONENT UNITS (Continued)

Celia Saxon II, LP (CS2) –

Operating Reserve Funding The operating reserve shall be established by the managing member (CHAD) and funded from capital contributions. As required by the lender, the reserve shall be established in the amount of \$60,000. Funds in the operating reserve account shall be used to pay the operating costs and expenses of the Company to the extent the Company's collected gross receipts are insufficient for such purposes. The operating reserve is to be held in an interest-bearing segregated account. The managing member shall give the investor member notice of any intended use of the operating reserve. The investor member shall have five business days to approve or reject such use, after which time the managing member may assume approval. The managing member will not need approval for any withdrawals aggregating less than \$2,000 per annum. An analysis of the operating reserve for the year ended December 31, 2018 is as follows:

Balance, beginning of year	\$ 84,359
Interest income	<u>54</u>
Balance, end of year	<u>\$ 84,413</u>

Replacement Reserve Funding The operating agreement requires the Company to fund a replacement reserve using cash flow from operations, as defined. The amount contributed to such reserve shall be the greater of (a) \$250 per rented unit per month, which shall be increased 4% each year; (b) the level required by the relevant state allocating agency; or (c) the level required by a lender. Funds in the replacement reserve may be used by the managing member only to make substantial repairs, capital expenditures, and/or replacement of capital assets of the Company. The managing member may not utilize the replacement reserve for any withdrawal over \$2,000, or an aggregate in excess of \$10,000 over the course of four months without the investor member's written consent. The replacement reserve is to be held in an interest-bearing, segregated account with any interest earned added to the amount of the replacement reserve. An analysis of the replacement reserve for the year ended December 31, 2018 is as follows:

Balance, beginning of year	\$ 46,304
Contributions	8,999
Fees, net of interest	(58)
Withdrawals	<u>(4,467)</u>
Balance, end of year	<u>\$ 50,778</u>

As of December 31, 2018, the replacement reserve is underfunded by approximately \$12,200.

Other Restricted Cash In addition to the above restricted operating reserve and replacement reserve, Celia Saxon II, LP also has \$14,681 of restricted tenant security deposits as well as \$82,395 in restricted tax and insurance escrows.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 3: Cash and Investments (Continued)

DISCRETE COMPONENT UNITS (Continued)

Lorick Place LLC (LP) – As part of the ongoing construction activities at the development, various reserves were required as part of the Development agreements. An analysis of the reserve for the year ended December 31, 2018 is as follows:

Working capital deficit escrow account	\$ 350,400
Initial operating reserve deficit account	131,400
PNC construction period collateral account	<u>350,239</u>
 Total restricted funds as of December 31, 2018	 <u>\$ 832,039</u>

The \$832,039 of funds above was considered part of restricted net position as of Dec. 31, 2018.

NOTE 4: Accounts Receivable

As of June 30, 2019, accounts receivable consisted of the following:

A/R - HUD (CFP/Grant reimbursements)	\$ 1,201,399
Tenants A/R, net of allowance of \$32,390	253,175
City of Columbia/HOPWA	74,715
A/R - USC/Continuum	8,992
A/R - Cayce	65,902
A/R - Component units (Celia Saxon I, LP Tax Credit)	123,948
A/R - Component units (Lorick Place)	731,536
A/R - Summer Food program reimbursements	3,314
Accrued interest receivable	63,557
A/R - Miscellaneous	39,057
	<u>\$ 2,565,595</u>

\$54,850 of Interfund amounts have been eliminated from the financial statements.

NOTE 5: Assets Held for Sale

As of June 30, 2019, assets held for sale consisted of the following:

	Balance as of July 1, 2018	Net Change	Balance as of June 30, 2019
CDBG - Neighborhood Stabilization Program			
Homes for Sale - Neighborhood Stabilization program	\$ 500,353	\$ (18,733)	\$ 481,620
	<u>\$ 500,353</u>	<u>\$ (18,733)</u>	<u>\$ 481,620</u>
 Assets held for sale as of July 1, 2018	 \$ 500,353		
Cost of homes sold	(18,733)		
Assets held for sale balance as of June 30, 2019	<u>\$ 481,620</u>		

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 6: Notes Receivable

As of June 30, 2019, notes receivable consisted of the following:

	Balance as of July 1, 2018	Net Change	Balance as of June 30, 2019	Current Portion	Long-Term Portion
Component Unit					
Note Receivable - Single Family Homes	41,666	-	41,666	-	41,666
	41,666	-	41,666	-	41,666
Business Activities					
North Pointe Affordable Housing (Dated 4/23/15, 5% interest, Due 4/1/2025)	165,000	(60,000)	105,000	-	105,000
Hope VI					
Mortgage notes receivable	1,114,756	(1,114,756)	-	-	-
Less allowance	(1,097,109)	1,097,109	-	-	-
	17,647	(17,647)	-	-	-
	<u>\$ 224,313</u>	<u>\$ (77,647)</u>	<u>\$ 146,666</u>	<u>\$ -</u>	<u>\$ 146,666</u>

Activity for the fiscal year ended June 30, 2019 consisted of the following:

Notes receivable as of July 1, 2018	\$ 224,313
Payments	(60,000)
Loan forgiveness - Mortgage receivable	(17,647)
Notes receivable as of June 30, 2019	<u>\$ 146,666</u>

As part of the HOPE VI Redevelopment Plan, the Housing Authority of the City of Columbia has issued the above note receivable for a term of 18 years. Principal and interest on the outstanding principal balance and on any unpaid accrued interest will compound annually until the maturity date. The Owner Entity will be expected to pay monthly installments of principal and interest in the amount of \$1,591 to the extent of the borrower's cash flow available after first paying operating expenses, capital expenditures, and payments due the first mortgage lender pursuant to the first mortgage lender's loan documents.

To the extent that it is not paid prior to that date, all principal and accrued interest will be due and payable on the maturity date. No payment had been made as of June 30, 2019 and a \$17,647 amount was recognized as loan forgiveness. Additionally, the 18-year compliance term related to these units expired during the audit period and forgiveness of all underlying loans on the units has been forgiven.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 7: Capital Assets

The capital assets (at cost) of the Housing Authority of the City of Columbia at June 30, 2019 consisted of the following:

	Balance at June 30, 2018	Additions	Deletions	Transfers	Balance at June 30, 2019
Primary Government					
Nondepreciable capital assets:					
Land	\$ 16,939,407	\$ 64,205	\$ (1,337,051)	\$ 240,665	\$ 15,907,226
Construction in progress	3,626,698	2,332,079	(50,011)	(5,645,547)	263,219
Total nondepreciable	20,566,105	2,396,284	(1,387,062)	(5,404,882)	16,170,445
Depreciable capital assets:					
Buildings and improvements	171,676,647	896,983	(7,993,699)	5,851,305	170,431,236
Leasehold improvements	446,423	-	-	(446,423)	-
Furniture, equipment, vehicles	1,706,253	159,207	-	-	1,865,460
	173,829,323	1,056,190	(7,993,699)	5,404,882	172,296,696
Accumulated Depreciation:					
Buildings and improvements	(95,467,370)	(6,266,689)	6,225,205	-	(95,508,854)
Furniture, equipment, vehicles	(1,471,036)	(30,629)	-	-	(1,501,665)
	(96,938,406)	(6,297,318)	6,225,205	-	(97,010,519)
Total depreciable	76,890,917	(5,241,128)	(1,768,494)	5,404,882	75,286,177
Total Capital Assets, net	\$ 97,457,022	\$ (2,844,844)	\$ (3,155,556)	\$ -	\$ 91,456,622

NOTE 8: Unearned revenue

Tenant prepaid rents	\$ 151,988
Unearned revenue - DHAP program	88,692
Unearned revenue - HAP Programs	14,371
Scholarship funds/contributions	8,188
	<u>\$ 263,239</u>

NOTE 9: Accounts Payable, Accrued Liabilities and Other Current Liabilities

Accounts payable, accrued liabilities and other current liabilities at June 30, 2019 consist of the following:

Accounts Payable	
Vendors and contractors	\$ 1,430,514
Accrued wages	22,538
Accounts payable - other government	344,929
Accounts payable - HUD	102,610
	<u>\$ 1,900,591</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 9: Accounts Payable, Accrued Liabilities and Other Current Liabilities (Continued)

Accrued Liabilities

Accrued compensated absences - current	\$ 456,214
	<u>\$ 456,214</u>

Other Current Liabilities

Accrued liabilities - Capital Fund	\$ 412,798
Accrued utilities/other	224,394
Accrued interest payable	39,621
	<u>\$ 676,813</u>

NOTE 10: Capital Lease Obligation

The Authority entered into a master equipment lease purchase agreement to finance energy improvements being made to Public Housing units. Such agreements are, in substance, purchases (capital leases) and are reported as capital lease obligations. The following schedule presents future minimum lease payments:

<u>June 30,</u>	
2020	\$ 216,374
2021	223,016
2022	229,219
2023	240,077
2024	245,436
Thereafter	<u>2,608,373</u>
Total minimum lease payments	3,762,495
Less: Amount representing interest	<u>(1,058,328)</u>
Present value of minimum lease payments	<u>\$ 2,704,167</u>
Current portion	\$ 100,000
Long-term portion	<u>2,604,167</u>
Total	<u>\$ 2,704,167</u>

Capital assets under capital lease at June 30, 2019 include the following:

Building improvements	\$ 2,886,166
Less: Accumulated depreciation	<u>(997,861)</u>
Total	<u>\$ 1,888,305</u>

Amortization of leased capital assets is included with depreciation expense. Depreciation expense for assets under capital lease was \$182,998 for the year ended June 30, 2019.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable

Capital facilities and assets held for sale are financed by debt. As of June 30, 2019, notes payable consisted of the following:

Notes Payable (Business Activities)

The Authority had two notes payable to Security Federal on June 30, 2019 for principal amounts of \$498,378 and \$1,009,469. The principal amounts are due on March 17, 2024 and June 28, 2024 with principal and interest payable in monthly payments of \$5,453 and \$10,743. The interest rate at June 30, 2019 was 5.0% and 5.0%, and the total principal outstanding at year end was \$1,507,847. The loans were used to finance 44 Windsor Point apartment complex and Rosewood Townhomes. The current portion is \$121,533. \$ 1,507,847

The Authority had a note payable to First Citizens for a principal amount of \$548,964 at June 30, 2019. Monthly principal and interest payments are \$7,334 and loan matures on December 6, 2026 and has an interest rate of 4.6%. The loan was used to to build duplexes at Rosewood Hills. The current portion is \$64,114. 548,964

The Authority had a note payable to Synovus for a principal amount of \$133,614 at June 30, 2019. The loan was initially scheduled to mature on May 5, 2019 but was extended to August 5, 2019. Principal and interest is payable in monthly payments of \$1,371 and the remaining unpaid principal and interest is due at maturity. The interest rate at June 30, 2019 was 4.0%. All amounts are considered current. 133,614

The Authority had a note payable to Woodforest National Bank for a principal amount of \$3,598,323 at June 30, 2019. The loan matures on February 5, 2023. Interest only payments are due monthly until February 5, 2019. Principal and interest payments are due monthly starting March 5, 2019 until maturity at an interest rate of 3.50%. The loan was used to purchase Petan Apartments. \$113,336 of the balance is considered current. 3,598,323

The Housing Authority had a note payable to Ameris bank for a principal amount of \$301,114 as of June 30, 2019. The loan matures on January 9, 2023 and has a fixed rate of 4.85% per with \$2,098 monthly payments. The loan was used to purchase Springwood Apartments and and Windsor Hills Apartments and \$10,571 of the balance is considered current. 301,114

The Housing Authority had a note payable to Synovus for a principal amount of \$1,953,818 as June 30, 2019. The loan matures on November 29, 2022 and has a fixed rate of 3.98% per with \$12,556 monthly payments. The loan was used to purchase Bentley Court Apartments \$74,059 of the balance is considered current. 1,953,818

The Housing Authority had a note payable to Optus Bank for a principal amount of \$300,000 as of June 30, 2019. The loan matures on October 26, 2020 and has a fixed rate of 5.25% with interest-only monthly payments. The loan was used to purchase Carter Street Apartments and the loan is considered non-current. 300,000

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable (Continued)

Notes Payable (Business Activities)

The Housing Authority had a note payable to Synovus for a principal amount of \$1,501,224 at June 30, 2019. The loan matures on May 10, 2023 and has a fixed rate of 3.98% per annum and \$9,401 in monthly payments. The loan was used to purchase English Meadows Apartments. \$54,302 of the balance is considered current.

1,501,224

The Housing Authority had a line of credit payable for a principal amount of \$146,992 as of June 30, 2019. The loan matures on June 28, 2020 and has a fixed rate of 5.25% per annum with interest-only payments. The loan was used to purchase Yorketown Court Apartments and all amounts are considered current.

146,992

Subtotal - Business Activities

9,991,896

Notes Payable (HOPWA)

The Authority acquired a property financed with a \$116,548 loan from the City of Columbia for the use of the HOPWA program. The loan is interest free and is forgivable over a ten year period ending August 1, 2025. However, if the units are deemed not to be dedicated to HOPWA eligible clients, the pro-rated amount of the loan based on time period of usage meeting compliance standards would be due 60 days from when the units were found to not be in compliance, as determined by the City of Columbia. The current portion is \$23,310.

59,263

Subtotal - HOPWA

59,263

Notes Payable (Blended Component Unit)

The balance of the NSP loan at June 30, 2019 was \$19,727. The repayment is contingent upon future cash flows and \$95,273 was repaid during the audit period. There are no amounts considered currently due within the next fiscal year.

19,727

The Housing Authority issued an interest-only Line of Credit with First Citizens Bank to help finance redevelopment activities during the audit period. The balance outstanding at June 30, 2019 was \$1,157,896 and has a variable interest rate, which was 5.50% at June 30, 2019. There are no amounts considered currently due within the next fiscal year.

1,157,896

The Authority refinanced its loans on the Celia Saxon Shopping Center during 2016 with Security Federal for \$2,750,000 and has an outstanding balance of \$2,506,706 at June 30, 2019, which accrues interest at 4.25% per annum. The loan is payable over 60 months with monthly principal and interest payments of \$14,994 and a balloon payment due at maturity on October 21, 2020. The current portion is \$74,041.

2,506,706

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable (Continued)

Notes Payable (Blended Component Unit)

The Housing Authority had a note payable to First Citizens for a principal amount of \$762,154 as of June 30, 2019. The loan matures on February 1, 2028 and has a fixed rate of 5.10% per annum with \$9,110 in monthly payments. The loan was used to purchase T S Martin Apartments and \$71,483 of the balance is considered current.

762,154

The Housing Authority issued a promissory note on July 7, 2011 for \$1,870,000 for Bayberry Mews Apartments and has an outstanding balance of \$1,329,723 at June 30, 2019, which accrues interest at 4.25% per annum. The loan is payable over 60 months with monthly principal and interest payments of \$11,640. This loan has a maturity date of July 5, 2021. The current portion is \$86,642.

1,329,723

The Authority refinanced its loans on the Capital Heights Apartments with Woodforest Bank for \$2,600,000 and has an outstanding balance of \$2,309,035 at June 30, 2019, which accrues interest at 4.00% per annum. The loan is payable over 60 months with monthly principal and interest payments of \$14,994 and a balloon payment due at maturity on September 13, 2022. The current portion is \$97,072.

2,309,035

Subtotal - Component Unit

8,085,241

Total - All Notes Payable

18,136,400

Less current maturities

(1,071,069)

Long-term portion at June 30, 2019

\$ 17,065,331

For the year ended June 30, 2019, the Authority had the following changes in its long-term notes payable:

Balance at June 30, 2018	\$ 18,588,274
Principal additions	1,604,888
Principal retirements	<u>(2,056,762)</u>
	18,136,400
Less current maturities	<u>(1,071,069)</u>
Balance at June 30, 2019	<u><u>\$ 17,065,331</u></u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable (Continued)

As of June 30, 2019, the annual requirements for debt retirement are:

Year	Principal	Interest	Total
2020	\$ 1,071,069	\$ 746,416	\$ 1,817,485
2021	4,638,068	587,433	5,225,501
2022	1,827,030	450,949	2,277,979
2023	8,872,545	264,574	9,137,119
2024	1,148,702	75,198	1,223,900
2025 - 2029	559,259	44,698	603,957
2030 - 2034	19,727	-	19,727
Total	<u>\$ 18,136,400</u>	<u>\$ 2,169,268</u>	<u>\$ 20,305,668</u>

DISCRETE COMPONENT UNITS – the discrete component units have the following mortgage debt as of December 31, 2018:

Mortgage Loan Payable

Celia Saxon I, LP (CS1)

Analysis of mortgage loan payable as of December 31, 2018 is as follows:

Mortgage loan payable to First Citizens Bank in the amount of \$944,814 with payments of \$7,196 including interest at 7.73%, due monthly until maturity on March 8, 2021, at which time a final payment of all outstanding principal and accrued interest shall be due and payable. The loan is secured by a first deed of trust on the property.	\$ 675,978
Less: unamortized debt issuance costs	<u>(7,047)</u>
	668,931
Less: current maturities of notes payable	<u>(34,598)</u>
	<u>\$ 634,333</u>

Total estimated principal maturities of the mortgage loan payable subsequent to December 31, 2018 are as follows:

2019	\$ 34,598
2020	37,265
2021	<u>604,115</u>
	<u>\$ 675,978</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable (Continued)

DISCRETE COMPONENT UNITS (Continued)

Mortgage Loan Payable

Celia Saxon II, LLC (CS2)

Note payable to First Citizen Bank and Trust Company in the original amount of \$950,000, which bears interest at 7.76% per annum and is payable in monthly installments of \$7,252. Any outstanding principal and interest is payable on December 31, 2021. The loan is secured by the ground lease from Columbia Housing Authority Development, Inc.

	\$ 705,012
Less: unamortized debt issuance costs	<u>(6,424)</u>
	698,588
Less: current maturities	<u>(32,721)</u>
	<u>\$ 665,867</u>

Estimated principal maturities of mortgage payable subsequent to December 31, 2018 are as follows:

2019	\$ 32,721
2020	35,238
2021	<u>637,053</u>
	<u>\$ 705,012</u>

Lorick Place, LLC (LP)

Mortgage Loan - On November 1, 2018, Lorick Place LLC entered into a \$8,760,000 HUD 221 (d) (4) Multi-family loan with PNC Bank as the secured party to help finance construction activities at the development. The balance outstanding as of December 31, 2018 in the amount of \$1,792,034 to PNC Bank and the loan accrues interest at 4.65%. Accrued but unpaid interest totaled \$7,077 as of December 31, 2018.

Bridge Loan - On November 27, 2018, Lorick Place LLC entered into a \$3,850,000 bridge loan with PNC Bank as the secured party to help finance construction activities at the development. The balance outstanding as of December 31, 2018 in the amount of \$81,735 to PNC Bank and the loan accrues interest at 5.25%. The maturity date is May 27, 2020 unless extended to November 27, 2020. This obligation is anticipated to transition to permanent financing in February 2020 after completion of construction activities.

Housing Authority of the City of Columbia Loan - On November 28, 2018, Lorick Place LLC entered into a \$1,379,312 promissory note with the Housing Authority of the City of Columbia, SC in the amount of \$1,379,312 to help finance construction activities at the development. The maturity date of the loan is July 31, 2060 and no loan proceeds had advanced to Lorick Place LLC as of December 31, 2018.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 11: Notes Payable (Continued)

DISCRETE COMPONENT UNITS (Continued)

Lorick Place, LLC (LP) Conduit Debt Obligations

The South Carolina State Housing Finance and Development Authority issued \$7,500,000 of Multifamily Housing Revenue Bonds (Lorick Place Apartments Project) Series 2018 (CUSIP: 83712EGY4) on November 1, 2018. Proceeds of the Bonds were used to make a loan to Lorick Place, LLC, a South Carolina limited liability company (the "Borrower"), to enable the Borrower to pay a portion of the cost of acquiring, rehabilitating and equipping an 87-unit multifamily rental housing facility, located in Richland County, South Carolina known as Lorick Place Apartments (the "Project").

The Bonds will bear interest at 2.43% (the "Initial Interest Rate") from their date to but not including the Initial Mandatory Tender Date of November 1, 2020 with a final maturity date of November 1, 2021. Interest is payable on each May 1 and November 1, commencing May 1, 2019. The Bonds are a special limited obligation of the Issuer, payable solely from the revenues and other money assigned by the Indenture to secure that payment. As of December 31, 2018, \$7,500,000 of bonds were outstanding.

NOTE 12: Schedule of Changes in Other Noncurrent Liabilities:

	June 30, 2018				June 30, 2019	
	Long-Term Portion	Current Portion	Net Additions	Net Payments	Long-Term Portion	Current Portion
Accrued comp. absences	\$ 136,249	\$ 412,341	\$ 258,598	\$ (198,902)	\$ 152,072	\$ 456,214
FSS escrow /other liabilities	333,722	-	149,944	(258,558)	225,108	-
Capital lease obligation	2,704,166	90,001	-	(90,000)	2,604,167	100,000
Notes payable	16,024,339	2,563,935	1,604,888	(2,056,762)	17,065,331	1,071,069
Pension liability	10,214,866	-	87,073	-	10,301,939	-
OPEB liability	6,626,665	-	(65,183)	-	6,561,482	-
	<u>\$ 36,040,007</u>	<u>\$ 3,066,277</u>	<u>\$ 2,035,320</u>	<u>\$ (2,604,222)</u>	<u>\$ 36,910,099</u>	<u>\$ 1,627,283</u>

NOTE 13: Pension Plans

Defined Contribution Plan:

The Authority provides a defined contribution pension plan for some employees who chose not to participate (at initial enrollment) in the defined benefit plan below. The Authority currently contributes 13.7% of each covered employee's salary. Employer contributions totaled approximately \$111,328 with total covered payroll of \$812,613 for the year ended June 30, 2019.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 13: Pension Plans (Continued)

Defined Benefit Plan:

Plan Description

The Authority contributes to the South Carolina Retirement System (SCRS), which is a cost sharing, multiple employer defined benefit pension plan administered by the Retirement Division of the SC Public Employee Benefit Authority (SC PEBA). The SCRS offers retirement, disability, survivor, and death benefits to eligible members or beneficiaries. The Plan's provisions are established under Title 9 of the SC Code of Laws. The SC PEBA issues a Comprehensive Annual Financial Report (CAFR) containing financial statements and required supplementary information for the SCRS. The CAFR is publicly available online at www.retirement.sc.gov, or a copy may be obtained by submitting a request to the SC PEBA, PO Box 11960, Columbia, SC 29211-1960.

All full-time and part-time Authority employees that work more than 30 hours are required to participate in the System starting at the time of employment. Class Two members, members hired prior to July 1, 2012, are vested after 5 years of earned service. Class Three members, members hired after June 30, 2012, are vested after 8 years of earned service. Class Two members are eligible to commence their retirement benefit after they have 28 years of credited service or attained age 65 with 5 years of service. Class Three members are eligible to commence their retirement benefit after they have attained age 65 with 8 years of earned service or the combination of the member's age and years of credited service equals or exceeds 90. The monthly benefit is calculated based on 1.82% times the member's Average Final Compensation (AFC) times their years of credited service.

Contributions

Both employees and employers are required to contribute to the Plans under authority of Title 9 of the SC Code of Laws. Reference §9-1-1085(A) and §9-11-225. The base contribution rates are set by statute, but are required to be increased by the trustees on the basis of the annual actuarial valuation if necessary to maintain a thirty-year amortization period for the Plan's unfunded liabilities. The Authority is required to contribute an amount equal to 14.41% of each employee's annual compensation to the plan for fiscal year ending June 30, 2019. Employees are required to contribute an amount equal to 9% to the plan. Pension contributions for the year ended June 30, 2019 totaled \$1,160,933, which consisted of \$446,322 of required employee contributions and \$714,611 of required employer contributions. Total salaries used to calculate required contributions amounted to \$4,959,132 for the year ended June 30, 2019.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 13: Pension Plans (Continued)

Pension Liabilities, Pension Expense, Deferred Outflows of Resources, and Deferred Inflows of Resources Related to Pensions

At June 30, 2019, the Authority reported a liability of \$10,301,939 for its proportionate share of the net pension liability. The net pension liability was measured as of June 30, 2018, and the total pension liability used to calculate the net pension liability was determined by an actuarial valuation as of that date. The Authority's proportion of the net pension liability was based on a projection of the Authority's long-term share of contributions to the pension plan relative to the projected contributions of all participating entities, actuarially determined. At June 30, 2019, the Authority's proportion was 0.045977 percent.

At June 30, 2019, the Authority reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	<u>Deferred Outflows of Resources</u>	<u>Deferred Inflows of Resources</u>
Differences between expected and actual results	\$ 18,596	\$ 60,624
Changes of assumptions	408,723	-
Net difference between projected and actual earnings on Plan investments	510,091	346,444
Changes in proportion and differences between Authority contributions and proportionate share of contributions	272,243	34,369
Authority contributions subsequent to the measurement date	752,266	-
Total	<u>\$ 1,961,919</u>	<u>\$ 441,437</u>

The \$752,266 of deferred outflows of resources resulting from the Authority's contributions subsequent to the measurement date will be recognized as a reduction of the net pension liability in the year ending June 30, 2019. Other amounts reported as deferred outflows of resources and deferred inflows of resources will be recognized in pension expense as follows:

<u>Year Ending June 30,</u>	
2020	\$ 492,663
2021	368,910
2022	(78,708)
2023	(14,649)
	<u>\$ 768,216</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 13: Pension Plans (Continued)

Actuarial Assumptions. The total pension liability was determined using the following actuarial assumptions from the actuarial report on July 1, 2016, applied to all periods included in the measurement:

Actuarial Cost Method	Entry Age Normal
Asset Valuation Method	5-Year Smoothed
Amortization Method	Level % of Pay
Amortization Period	30 Years Variable, not to exceed 30 years
Investment Return	7.50%
Inflation	2.25%
Salary Increases	3.00% Plus Step Rate Increases

Mortality rates were based on the RP-2000 Mortality Table (White Collar Adjustment for Educators), projected at Scale AA from Year 2016. Male rates multiplied by 100% for non-educators and 92% for educators. Female rates multiplied by 111% for non-educators and 98% for educators.

Discount Rate. The discount rate used to measure the total pension liability was 7.25 percent. The projection of cash flows used to determine the discount rate assumed that employee contributions will be made at the current contribution rate and that contributions from employers will be made at contractually required rates, actuarially determined. Based on those assumptions, the SCRS's fiduciary net position was projected to be available to make all projected future benefit payments of current active and inactive employees. Therefore, the long-term expected rate of return on plan investments was applied to all periods of projected benefit payments to determine the total pension liability.

Sensitivity of the Authority's Proportionate Share of the Net Pension Liability to Changes in the Discount Rate. The following is the Authority's proportionate share of the net pension liability calculated using the discount rate of 7.25 percent, and what the Authority's proportionate share of the net pension liability would be if it were calculated using a discount rate that is 1-percentage-point lower (6.25%) or 1-percentage-point higher (8.25%) than the current rate:

	Discount Rate	Authority's Proportionate Share of Net Pension	
			Liability
1% decrease	6.25%	\$	13,163,966
Current discount rate	7.25%	\$	10,301,940
1% increase	8.25%	\$	8,255,865

Plan Fiduciary Net Position. Detailed information about the SCRS's fiduciary net position is available in the separately issued SCRS financial report.

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June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB)

In accordance with GASB Statement Number 75, the Authority ("CHA") has recognized an unfunded liability of \$6,561,482 as of the June 30, 2018 measurement date used to determine this valuation. Underlying particulars and assumptions related to this valuation are as follows:

Valuation Date (VD):	June 30, 2017
Prior Measurement Date:	June 30, 2017
Measurement Date (MD):	June 30, 2018
Reporting Date (RD):	June 30, 2019
Membership Data as of June 30, 2017:	
Inactive Members or Beneficiaries Currently Receiving Benefits	8
Inactive Members Entitled To But Not Yet Receiving Benefits	0
Active Members	138
Total Membership	146
Discount Rate:	
Municipal Bond Index Rate at Prior Measurement Date	3.56%
Municipal Bond Index Rate at Measurement Date	3.87%
Total OPEB Liability as of Measurement Date:	\$ 6,561,482
OPEB Expense:	\$ 263,716
Deferred I/O Balances as of the Measurement Date*	
Deferred Inflow of Resources:	\$ 921,624
Deferred Outflow of Resources:	\$ 0

Related particulars to determine eligibility and benefit amounts are as follows:

Eligibility for Allowance	To receive post-retirement Columbia Housing Authority (CHA) provided contributions towards regular health care premiums, an employee must retire under the South Carolina Retirement System (SCRS), be at least 55 years old at retirement, and have 28 or more years of Earned Service Credits under South Carolina's Public Employee Benefit Authority (PEBA) to be eligible to elect retiree coverage.
Amount of Allowance	CHA has paid and intends to continue contributing 80% of the monthly premium amount to eligible retirees.

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Notes to Financial Statements

June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB) (Continued)

Other Post-Employment Benefits Medical and prescription drug benefits are offered through the Authority's participation in the fully-insured, state health plan administered by PEBA. Once a retiree becomes eligible for Medicare, coverage moves to the PEBA Medicare Supplement Plan. Dental and vision benefits are available through the Authority's participation in PEBA at the retiree's expense.

Dependent Coverage As of June 30, 2019, CHA did not provide dependent coverage.

Representative Monthly Retiree Premium Amounts The following are sample rates for medical coverage for each tier of coverage. Employees and non-Medicare eligible retirees on the Standard plan pay the same rates for coverage. These premiums do not include the 4.90% experience load. There is no per month administrative fee. The effective date of these rates is January 1, 2018.

Tier	Standard & Medicare Supplement
Retiree Only	472.64
Retiree & Spouse	996.08
Retiree & Children	719.34
Family	1,236.46

The Total OPEB Liability ("TOL") was determined by an actuarial valuation as of June 30, 2018, using the following key actuarial assumptions and other inputs:

Inflation	2.25%
Real wage growth	0.75%
Wage inflation	3.00%
Salary increases (including wage inflation)	3.00% - 7.00%
Municipal bond index rate (prior to measurement)	3.56%
Municipal bond index rate (measurement date)	3.87%
Health care cost trends (pre-medicare)	7.50% for 2017 decreasing to an ultimate rate of 5% by 2023
Health care cost trends (medicare)	5.50% for 2016 decreasing to an ultimate rate of 5% by 2020

The discount rate used to measure the TOL was based on the June average of the Bond Buyer General Obligation 20-year Municipal Bond Index published weekly.

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Notes to Financial Statements

June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB) (Continued)

Mortality rates were based on the RP-2014 Mortality Table for Employees with a 95% multiplier to better reflect the anticipated experience and provide margin for future improvements.

The demographic actuarial assumptions for retirement, disability incidence, withdrawal, and salary increases used in the June 30, 2017 valuation were based on the results of an actuarial experience study adopted by SCRS.

The remaining actuarial assumptions (e.g., initial per capita costs, health care cost trends, rate of plan participation, rates of plan election, etc.) used in the June 30, 2017 valuation were based on a review of recent plan experience done concurrently with the June 30, 2017 valuation.

The TOL of the Plan, calculated using the health care cost trend rates, as well as what the Plan's TOL would be if it were calculated using a health care cost trend rate that is 1-percentage-point lower or 1-percentage-point higher than the current rate.

Health Care Cost Trend Rate Sensitivity			
	1% Decrease	Current	1% Increase
Total OPEB Liability	\$ 5,386,188	\$ 6,561,482	\$ 8,098,116

The following exhibits present the TOL of the Plan, calculated using the discount rate of 3.87%, as well as what the Plan's TOL would be if it were calculated using a Discount Rate that is 1-percentage-point lower or 1-percentage-point higher than the current rate:

Discount Rate Sensitivity			
	1% Decrease (2.87%)	Current Discount Rate (3.87%)	1% Increase (4.87%)
Total OPEB Liability	\$ 7,899,464	\$ 6,561,482	\$ 5,511,030

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Notes to Financial Statements

June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB) (Continued)

A review of activity during the June 30, 2018 measurement period used to determine the June 30, 2019 liability is as follows:

Changes in the TOL	
Total OPEB Liability as of June 30, 2017	\$ 6,626,665
Changes for the year:	
Service Cost at the end of the year*	167,244
Interest on TOL and Cash Flows	234,809
Change in benefit terms	0
Difference between expected and actual experience	(24,694)
Changes of assumptions or other inputs	(380,208)
Benefit payments and implicit subsidy credit	(62,334)
Other	<u>0</u>
Net changes	\$ (65,183)
Total OPEB Liability as of June 30, 2018	<u>\$ 6,561,482</u>

*The service cost includes interest for the year.

The following table provides a summary of the Deferred Outflows of Resources and Deferred Inflows of Resources as of June 30, 2018:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ 0	\$ 33,091
Changes of assumptions	0	888,533
Deferred Inflows subsequent to the measurement date	<u>84,550</u>	<u>0</u>
Total	<u>\$ 84,550</u>	<u>\$ 921,624</u>

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Notes to Financial Statements

June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB) (Continued)

The Deferred Outflows of Resources and Deferred Inflows of Resources related to OPEB benefits will be recognized in OPEB Expense in the following periods:

Measurement Period Ended June 30:		
2019	\$	(138,337)
2020	\$	(138,337)
2021	\$	(138,337)
2022	\$	(138,337)
2023	\$	(138,337)
Thereafter	\$	(229,939)

The calculation of the OPEB Expense for the year ended June 30, 2019 is shown in the following table:

OPEB Expense For Year Ending June 30, 2019	
Service Cost at end of year	\$ 167,244
Interest on the Total OPEB Liability and Cash Flow	234,809
Current-period benefit changes	0
Expensed portion of current-period difference between expected and actual experience in the Total OPEB Liability	(2,972)
Expensed portion of current-period changes of assumptions or other inputs	(45,753)
Recognition of beginning Deferred Outflows of Resources as OPEB Expense	0
Recognition of beginning Deferred Inflows of Resources as OPEB Expense	(89,612)
OPEB Expense	\$ 263,716

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Notes to Financial Statements

June 30, 2019

NOTE 14: Other Post-Employment Benefit (OPEB) (Continued)

Additional information related to the June 30, 2019 GASB Statement No. 75 Report of the Health Care Plan of the Columbia Housing Authority may be obtained upon request by contacting Director of Human Resources, 1917 Harden Street, Columbia, SC 29204.

NOTE 15: Net Position (for the Authority) and Members/Partners Equity for the Discrete Component Units

See below for a schedule of changes in Net Position for the Authority:

	Net Investment in Capital Assets	Restricted Net Position	Unrestricted Net Position	Total
Balance, beginning of year	\$ 76,074,581	\$ 1,138,769	\$ (971,519)	\$ 76,241,831
Prior period adjustment	-	-	-	-
Balance, beginning of year - Restated	76,074,581	1,138,769	(971,519)	76,241,831
Decrease in net position	-	-	(8,084,565)	(8,084,565)
Changes in restricted net position	-	89,175	(89,175)	-
Changes in net investment in capital assets	(5,458,526)	-	5,458,526	-
Balance, end of year	<u>\$ 70,616,055</u>	<u>\$ 1,227,944</u>	<u>\$ (3,686,733)</u>	<u>\$ 68,157,266</u>

DISCRETE COMPONENT UNITS – information on partner capital contributions and distributions for the discrete component units are as follows as of December 31, 2018:

Partners' Capital Contributions

Celia Saxon I, LP (CS1) - The Partnership has one general partner - Columbia Housing Authority Developments, Inc. (CHAD) and one limited partner - The Housing Outreach Fund IX Limited Partnership. The limited partner is required to make capital contributions of \$3,109,920 after a tax credit adjuster of \$130,080, all of which has been received as of December 31, 2018.

Celia Saxon II, LLC (CS2) – Total managing member capital contributions, in accordance with the operating agreement, amount to \$1,000, of which the entire amount has been paid as of December 31, 2018. Total investor member capital contributions amount to \$3,081,360, all of which has been received as of December 31, 2018.

Lorick Place, LLC (LP) - Total managing member capital contributions, in accordance with the operating agreement, amount to \$100, of which no amounts had been paid as of December 31, 2018. Total investor member capital contributions amount to \$1,107,906, all of which has been received as of December 31, 2018.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 15: Net Position (for the Authority) and Members/Partners Equity for the Discrete Component Units (Continued)

Distributions from Cash Flow

Celia Saxon I, LP (CS1) - The interest of the general partner (CHAD) is .01% and the interest of the limited partners is 99.99%. Payment of fees and other expenses contingent on cash flow shall be made in the following order of priority: First, to the limited partner, an amount equal to the credit deficiency; Second, to the limited partner, an amount sufficient to pay federal income taxes on taxable income allocated to the limited partner for such fiscal year by the Partnership, assuming the highest marginal tax rates applicable to corporations; Third, to pay the investor services fee in accordance with the investor services agreement; Fourth, to fund the operating reserve after the capital contributions of the limited partner have been paid, up to the operating reserve amount; Fifth, to pay the deferred development fee in accordance with the amended and restated development services agreement; Sixth, to the general partner to repay any operating deficit contribution; Seventh, to pay the partnership administration fee* in accordance with the partnership administration agreement; Eighth, to pay the tenant services fee* in accordance with the tenant services agreement; and Ninth, any remaining cash flow shall constitute net cash flow which is distributable to the partners in accordance with their partnership interests.

*Notwithstanding the above priority, to the extent that more than 80% of cash flow available to pay the investor services fee, the tenant services fee and the partnership administration fee would pay the partnership administration fee and tenant services fee, the excess shall either be deposited in the Partnership's operating reserve or distributed to the partners in accordance with their interests.

Celia Saxon II, LP (CS2) - Net cash flow is to be distributed as follows, as per the operating agreement: First, reimbursement of the investor member for any credit deficiency or any loans made to the Company; Second, replenishment of the operating reserve to the required amount; Third, payment of the asset management fee, including any unpaid amounts; Fourth, payment of any amount of the deferred developer fee then due (if applicable); Fifth, reimbursement of any operating deficit loans or credit adjuster advances; Sixth, payment of any management fee to an affiliate of the managing member; Seventh, payment of the incentive management fee to the managing member; and Eighth, the remainder to the members according to their percentage interests: Managing member (CHAD) - .01% and Investor member - 99.99%. At December 31, 2018, there was no net cash flow available to be distributed.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 15: Net Position (for the Authority) and Members/Partners Equity for the Discrete Component Units (Continued)

Distributions from Cash Flow (Continued)

Lorick Place, LLC (LP) - Beginning in the first year in which the achievement of Stabilized Occupancy has occurred, available net cash flow generated by the project after payment of operating expenses, debt service and replacement reserve deposits would be distributed within 45 days of the end of the year as follows: A: to PNC, \$75 per unit as a cumulative annual investors services fee, increasing 3.00% per year; B: To PNC, as a reimbursement for any fees, debts or liabilities owed to PNC; C: To the required replenishment of the Operating Reserve Account (hereinafter defined); D: To the extent taxable income is allocated to PNC, 40.00% of the taxable income; E: To the Developer(s), until payment in full of the development fee; F: To the General Partner(s), \$150 per unit as a cumulative annual partnership management fee, increasing 3.00% per year; G: To the General Partner(s) 10.00% of effective gross income, as an annual incentive management fee; H: To the General Partner(s), as a reimbursement for any fees, debts or liabilities owed to the General Partner(s) or subordinate loans; I: Any remaining net cash flow shall be distributed 90.00% to the General Partner(s) and 10.00% to PNC.

Interest reserve draws would be limited to that amount of monthly debt service which exceeds available net cash flow. The total amount of fees and distributions to the General Partner(s) in its capacity as General Partner would not be permitted to exceed 90.00% of available net cash flow annually. No distribution of net cash flow would be made prior to Stabilized Occupancy at any time without the consent of the Special Limited Partner.

NOTE 16: Discrete Component Unit Property Management Agreements and Fees

Property Management Fees

Celia Saxon I, LP (CS1) - The Company entered into an agreement with Superior Management, LLC ("Superior"). Under this agreement, the property management fee is calculated as a flat fee of \$40 per occupied unit per month. Up to 40% of the fee payable to Superior will be subordinated and deferred as necessary so that the Project does not have an operating deficit. For the year ended December 31, 2018, \$18,290 was charged to operations for management fees paid to Superior.

Celia Saxon II, LP (CS2) - The Company entered into an agreement with Superior Management, LLC ("Superior"). Under this agreement, the property management fee is calculated as a flat fee of \$40 per occupied unit per month. Up to 40% of the fee payable to Superior will be subordinated and deferred as necessary so that the Project does not have an operating deficit. For the year ended December 31, 2018, \$15,128 was charged to operations for management fees paid to Superior.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 16: Discrete Component Unit Property Management Agreements and Fees (Continued)

Miscellaneous Fees

Celia Saxon I, LP (CS1) - Per the investor services agreement, the Partnership shall pay The Enterprise Social Investment Corporation ("ESIC"), an affiliate of the limited partner, an annual investor services fee of \$3,000 beginning in 2005. For each year after 2005, the fee shall increase at 3% per year. The investor service fee shall be paid from available cash flow, as defined. Any unpaid fees shall accumulate and shall be payable out of available cash flow, as defined; provided however, that no amount of such fee shall be deducted as an expense by the Partnership until such amount is actually paid. During the year ended December 31, 2018, investor service fee expense amounted to \$4,406.

Celia Saxon II, LP (CS2) - The Company is required to pay the investor member a cumulative, annual asset management fee equal to \$3,500 beginning with the year ended December 31, 2006, for which a partial year was required, and will be paid out of net cash flow increasing 4% each year thereafter. During the year ended December 31, 2018, asset management fee expense amounted to \$5,388 of which \$10,569 remained payable at December 31, 2018.

See also Note 22 for related party transactions between the Authority, its blended component unit (CHAD) and the discrete component unit.

NOTE 17: Risk Management

The Authority is exposed to all common perils associated with the ownership and rental of real estate properties. A risk management program has been established to minimize loss occurrence and to transfer risk through various levels of insurance. Property, casualty, employee dishonesty and public official's liability forms are used to cover the respective perils. The State of South Carolina Insurance Reserve Fund insures all common perils such as business auto, computer and other miscellaneous policies.

NOTE 18: Economic Dependency

Both the PHA Owned Housing Program and the Section 8 Program are economically dependent on annual contributions and grants from HUD. Both programs operate at a loss prior to receiving the contributions and grants.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 19: Commitments & Contingencies

Legal: The Authority is party to various pending or threatened legal actions arising from the normal course of operations. Although the outcome of these actions is not presently determinable, it is the Authority's opinion that any resulting liability is not expected to have a material effect on the Authority's financial position.

On January 18, 2019, Columbia public safety officials ordered an evacuation of Allen Benedict Court after two men lost their lives as a result of carbon monoxide poisoning. As a result, over 400 residents of Allen Benedict were immediately relocated to replacement housing. The Allen Benedict Court Apartments will not to be returned to inventory and will be demolished in 2020. As of February 11, 2020, eight lawsuits have been filed against the Columbia Housing Authority as a result of this incidence. No liabilities have been recorded as of June 30, 2019 given that the potential liabilities associated with these lawsuits cannot be readily determined or reasonably estimated. If there is a negative outcome, the Authority's liability insurance is expected to cover \$1.2 million of any awards or settlements.

Grants and contracts: The Authority participates in various federally-assisted grant programs that are subject to review and audit by the grantor agencies. Entitlement to these resources is generally conditional based upon compliance with the terms and conditions of grant agreements and applicable federal regulations, including the expenditure of resources for allowable purposes. Any disallowance resulting from a federal audit may become a liability of the Authority. There were no such liabilities recorded as of June 30, 2019.

Rivers Edge contingency: In prior years, the Authority was awarded an American Recovery and Reinvestment Act Competitive grant (CFRC) in the amount of \$10 million for the River's Edge project. As a condition for receiving this award the Authority certified that it would be providing an additional \$7.6 million in leveraged funds. HUD required that if the leverage is not documented by the end of the grant period, the Authority will be responsible for repaying the CFRC in a proportionate amount. All of the CFRC funds have been drawn down by the Authority. The leverage ratio that must be sustained is \$1 CFRC funds to \$.76 of private and other public funds and any reduction in the leverage ratio would result in a corresponding reduction of the CFRC grant.

In the agreement, the developer was to provide \$6 million in funds to build 36 homeownership units, and the City committed to provide \$1.6 million for site improvements. To date, the City has provided its funds and during the audit period, the developer completed construction of this development that consists of 124 multi-family project based units with a total development costs in excess of \$10 million. Management believes all of the requirements have been met and that the ARRA grant is completed.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
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Notes to Financial Statements

June 30, 2019

NOTE 19: Commitments & Contingencies (Continued)

Other contingency: The Gonzales Gardens land and building were demolished with a Neighborhood Initiative Program ("NIP") grant in the amount of \$1,595,098 (received during the fiscal year ending June 30, 2018). These properties are encumbered and have a lien and a NIP Loan and Modification Agreement to SC Housing Corporation (SCHC) and the outstanding balance is due and payable upon sale, transfer or unauthorized use of the property and is forgivable after three years as long as program requirements are met. The Authority has not recorded these notes payable as it believes the notes are ultimately forgivable.

Discrete Component Unit Current Vulnerability Due to Certain Concentrations: The Discretely-presented Component Units (DCU) consist of three low-income housing complexes located in Columbia, South Carolina. The DCU's operations are concentrated in the affordable housing real estate market that operates in a heavily regulated environment. The operations of the Partnership are subject to the administrative directives, rules and regulations of federal, state and local regulatory agencies, including, but not limited to, the State Housing Agency. Such administrative directives, rules and regulations are subject to change by an act of Congress or an administrative change mandated by the State Housing Agency. Such changes may occur with little notice or inadequate funding to pay for the related cost, including the additional administrative burden, to comply with a change.

NOTE 20: Impairment of Capital Assets

In accordance with financial reporting standards issued by the Government Accounting Standards Board's, Statement No. 42, "Accounting and Financial Reporting for Impairment of Capital Assets and for Insurance Recoveries" requires certain note disclosures. During the fiscal year ended June 30, 2019, the Housing Authority of the City of Columbia incurred the following loss experience:

1. On January 18, 2019, Columbia public safety officials ordered an evacuation of Allen Benedict Court after two men were found dead from carbon monoxide poisoning due to natural gas leaks at the complex. Follow up inspections by Columbia Fire Department and public safety officials confirmed numerous gas leaks in multiple buildings. As a result, 411 residents of Allen Benedict were relocated and the Authority temporarily housed the residents in hotels throughout the Midlands area. The Allen Benedict Court Apartments have been subsequently condemned by the City of Columbia and it has been determined that the units will not be returned to inventory.
2. There were \$38,503 of net recoveries for capital asset related perils received from FEMA during the year and no unexpended proceeds were restricted on the Statement of Net Position as of June 30, 2019.
3. Based upon the condemnation of Allen Benedict Court, the permanent impairment at this site resulted in the recognition of an impairment loss of \$1,703,980 in the financial statement for the year ended June 30, 2019.

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Notes to Financial Statements

June 30, 2019

NOTE 21: Supplemental Information

The supplemental information has been included in order to show the financial statements of the Housing Authority on the GAAP basis of accounting but in the format of the HUD Handbook 7476.3, *Audit Guide*. This is due to the fact that some supplemental information is reviewed by the field office and provides greater detail concerning the operations of the Authority.

NOTE 22: Related Party Transactions

Transactions between the Authority and its blended and discrete component units are as follows:

Transactions between the Authority and the Discrete Component Units

Repairs and Maintenance

Celia Saxon II, LP (CS2) - The Partnership contracted with Columbia Housing Authority ("CHA"), an affiliate of the general partner, for repairs and maintenance services amounting to expenses of \$3,432 for the year ended December 31, 2018. As of December 31, 2018, no outstanding amounts remained payable.

Lease Agreements

Celia Saxon I, LP (CS1) - The Partnership entered into a lease agreement on February 25, 2004 with The Housing Authority of the city of Columbia, South Carolina, a municipal housing corporation under the laws of South Carolina, to lease the 2.44- acre parcel on which the Project is located. The term of the lease is for 98 years, and requires that the leased land be used by the Partnership for at least 40 years as a qualified low-income housing project. Annual rental for the leased land is \$1.

Celia Saxon II, LP (CS2) - The Company entered into a lease agreement on June 27, 2005 with The Housing Authority of the City of Columbia, South Carolina, a municipal housing corporation under the laws of South Carolina, to lease the 1.82 acre parcel on which the Project is located. The term of the lease is for 98 years, and requires that the leased land be used by the Company for at least 40 years as a qualified low-income housing project. Annual rental for the leased land is \$1.

Transactions between the Blended Component Unit (CHAD) and the Discrete Component Units

Accounts Payable

Celia Saxon I, LP (CS1) - Accounts payable, affiliate at December 31, 2018 consisted of \$266,383 for construction costs payable to CHAD. The payable is non-interest bearing and is due on demand.

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Notes to Financial Statements

June 30, 2019

NOTE 22: Related Party Transactions (Continued)

Transactions between the Blended Component Unit (CHAD) and the Discrete Component Units (Continued)

Partnership Administration Fee

Celia Saxon I, LP (CS1) - Per the partnership administration agreement, the Partnership shall pay to CHAD an annual partnership administration fee in the amount of \$25,000 starting in 2004 and increasing by 3% in subsequent years. The fee is payable from cash flow available, as defined. If not paid, the fee shall not accrue from year to year. During the year ended December 31, 2018, partnership administration fees amounted to \$6,598. As of December 31, 2018, \$30,338 remained payable.

Tenant Service Fee

Celia Saxon I, LP (CS1) - Per the tenant services agreement, the Partnership shall pay CHAD an annual tenant service fee of \$12,000. For each year after 2005, the fee shall increase at 3% per year. The fee shall be paid from remaining cash flow, as defined. No tenant service fee was paid during the year ended December 31, 2018.

Incentive Management Fee

Celia Saxon II, LP (CS2) - The Company shall pay the managing member (CHAD) an annual incentive management fee equal to 100% of the Company's net cash flow remaining after payment of the priority payments set forth in Section 7.01 of the operating agreement provided, however, that the incentive management fee shall in no event exceed the maximum amount of \$23,400 for the year. The incentive management fee shall not accrue from year to year. During the year ended December 31, 2018, no incentive management fees were charged to operations. As of December 31, 2018, no incentive management fees remained payable.

NOTE 23: Subsequent Events

Management for the primary government has evaluated subsequent events after June 30, 2019, and through February 24, 2020, the date which the financial statements were available to be issued, and no events were identified that would require recognition or disclosure within these financial statements except for the items noted above.

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Notes to Financial Statements

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NOTE 24: Financial Statement Information – Discrete Component Units

The combining statement of net position for the discretely presented component units as of December 31, 2018 is as follows:

	CELIA SAXON I, LP (CS1)	CELIA SAXON II, LLC (CS2)	LORICK PLACE, LLC (LP)	TOTAL
ASSETS				
CURRENT ASSETS				
CASH AND CASH EQUIVALENTS				
UNRESTRICTED	\$ 306,239	\$ 5,869	\$ -	\$ 312,108
RESTRICTED - OTHER	135,582	218,127	481,800	835,509
RESTRICTED - MODERNIZATION	-	-	350,239	350,239
RESTRICTED - SECURITY DEPOSIT	14,978	14,140	-	29,118
TOTAL RESTRICTED CASH	<u>160,560</u>	<u>232,267</u>	<u>832,039</u>	<u>1,214,866</u>
TOTAL CASH AND EQUIVALENTS	<u>466,799</u>	<u>238,136</u>	<u>832,039</u>	<u>1,526,974</u>
ACCOUNTS RECEIVABLE				
ACCOUNTS RECEIVABLE- TENANTS	1,735	5,039	-	6,774
ACCOUNTS RECEIVABLE- MISCELLANEOUS	813	-	-	813
TOTAL ACCOUNTS RECEIVABLE	<u>2,548</u>	<u>5,039</u>	<u>-</u>	<u>7,587</u>
PREPAID EXPENSES				
TOTAL CURRENT ASSETS	<u>469,347</u>	<u>243,175</u>	<u>832,039</u>	<u>1,536,925</u>
FIXED ASSETS				
LAND	314,850	383,790	325,000	1,023,640
BUILDING & IMPROVEMENTS	3,726,743	3,402,985	-	7,129,728
FURNITURE & EQUIPMENT	97,035	135,960	-	232,995
CONSTRUCTION IN PROGRESS	-	-	2,181,953	2,181,953
ACCUMULATED DEPRECIATION	<u>(1,548,906)</u>	<u>(1,447,950)</u>	<u>-</u>	<u>(2,996,856)</u>
NET FIXED ASSETS	<u>2,689,722</u>	<u>2,474,785</u>	<u>2,506,953</u>	<u>7,571,460</u>
OTHER ASSETS:				
OTHER ASSETS	<u>3,468</u>	<u>5,769</u>	<u>-</u>	<u>9,237</u>
TOTAL OTHER ASSETS	<u>3,468</u>	<u>5,769</u>	<u>-</u>	<u>9,237</u>
TOTAL ASSETS	<u>\$ 3,063,901</u>	<u>\$ 2,723,729</u>	<u>\$ 3,338,992</u>	<u>\$ 9,116,622</u>
LIABILITIES AND NET POSITION				
CURRENT LIABILITIES				
ACCOUNTS PAYABLE AND CURRENT LIABILITIES				
ACCOUNTS PAYABLE	\$ 9,299	\$ 11,391	\$ 357,317	\$ 378,007
ACCRUED SALARIES	-	264	-	264
ACCRUED INTEREST PAYABLE	4,500	4,711	-	9,211
ACCOUNTS PAYABLE OTHER GOVERNMENT	22,690	28,182	-	50,872
TOTAL ACCOUNTS PAYABLE	<u>36,489</u>	<u>44,548</u>	<u>357,317</u>	<u>438,354</u>
OTHER CURRENT LIABILITIES				
OTHER CURRENT LIABILITIES	30,602	10,569	-	41,171
ACCRUED LIABILITIES OTHER	266,383	-	-	266,383
TOTAL OTHER CURRENT LIABILITIES	<u>296,985</u>	<u>10,569</u>	<u>-</u>	<u>307,554</u>
UNEARNED REVENUE	2,792	1,007	-	3,799
CURRENT MATURITIES OF LONG TERM DEBT	34,598	32,721	-	67,319
TENANT SECURITY DEPOSITS	14,978	14,140	-	29,118
TOTAL CURRENT LIABILITIES	<u>385,842</u>	<u>102,985</u>	<u>357,317</u>	<u>846,144</u>
LONG TERM LIABILITIES				
NOTES/MORTGAGES PAYABLE	634,333	665,867	1,873,769	3,173,969
TOTAL LONG TERM LIABILITIES	<u>634,333</u>	<u>665,867</u>	<u>1,873,769</u>	<u>3,173,969</u>
TOTAL LIABILITIES	<u>1,020,175</u>	<u>768,852</u>	<u>2,231,086</u>	<u>4,020,113</u>
NET POSITION:				
NET INVESTMENT IN CAPITAL ASSETS	1,920,791	1,776,197	633,184	4,330,172
RESTRICTED NET POSITION	135,582	218,127	832,039	1,185,748
UNRESTRICTED NET POSITION	(22,647)	(39,447)	(357,317)	(419,411)
TOTAL NET POSITION	<u>2,033,726</u>	<u>1,954,877</u>	<u>1,107,906</u>	<u>5,096,509</u>
TOTAL LIABILITIES AND NET POSITION	<u>\$ 3,063,901</u>	<u>\$ 2,723,729</u>	<u>\$ 3,338,992</u>	<u>\$ 9,116,622</u>

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Notes to Financial Statements

June 30, 2019

NOTE 24: Financial Statement Information – Discrete Component Units (Continued)

The combining statement of revenue, expenses and changes in fund net position for the discretely presented component units for the year ended December 31, 2018 is as follows:

	CELIA SAXON I, LP (CS1)	CELIA SAXON II, LLC (CS2)	LORICK PLACE, LLC (LP)	TOTAL
OPERATING REVENUE				
RENTAL INCOME	\$ 256,423	\$ 229,543	\$ -	\$ 485,966
TENANT REVENUE - OTHER	2,713	2,265	-	4,978
TOTAL OPERATING REVENUE	259,136	231,808	-	490,944
OPERATING EXPENSES				
ADMINISTRATIVE SALARIES	17,889	17,701	-	35,590
AUDITING FEES	10,387	10,030	-	20,417
MANAGEMENT FEES	29,294	15,128	-	44,422
ADVERTISING AND MARKETING	387	-	-	387
EMPLOYEE BENEFITS - ADMIN	1,861	2,043	-	3,904
OFFICE EXPENSE	3,628	4,015	-	7,643
LEGAL EXPENSE	791	2,590	-	3,381
TRAVEL EXPENSE	182	-	-	182
OTHER OPERATING - ADMIN	1,485	-	-	1,485
ASSET MANAGEMENT FEES	-	5,388	-	5,388
TOTAL ADMINISTRATIVE EXPENSES	65,904	56,895	-	122,799
TENANT SERVICES	-	478	-	478
WATER	1,244	913	-	2,157
ELECTRICITY	749	354	-	1,103
TOTAL UTILITIES	1,993	1,267	-	3,260
ORDINARY MAINTENANCE (CONTRACT COSTS)	54,007	49,062	-	103,069
PROPERTY INSURANCE	14,152	17,857	-	32,009
PAYMENTS IN LIEU OF TAXES	12,195	14,747	-	26,942
TOTAL GENERAL EXPENSES	26,347	32,604	-	58,951
DEPRECIATION	110,911	106,186	-	217,097
TOTAL OPERATING EXPENSES	259,162	246,492	-	505,654
NET INCOME OR LOSS FROM OPERATIONS	(26)	(14,684)	-	(14,710)
NON OPERATING REVENUES (EXPENSES)				
INTEREST INCOME	-	54	-	54
INTEREST EXPENSE	(57,209)	(58,834)	-	(116,043)
TOTAL OTHER Expenses	(57,209)	(58,780)	-	(115,989)
NET LOSS BEFORE CAPITAL GRANTS	(57,235)	(73,464)	-	(130,699)
NET CAPITAL CONTRIBUTIONS (DISTRIBUTIONS)	-	-	1,107,906	1,107,906
CHANGE IN NET POSITION	(57,235)	(73,464)	1,107,906	977,207
NET POSITION - BEGINNING	2,090,961	2,028,341	-	4,119,302
NET POSITION - BEGINNING	2,090,961	2,028,341	-	4,119,302
NET POSITION - ENDING	\$ 2,033,726	\$ 1,954,877	\$ 1,107,906	\$ 5,096,509

Housing Authority of the City of Columbia
Columbia, South Carolina

Statement and Certification of Actual Capital Fund Program Costs

June 30, 2019

Annual Contributions Contract A-2392

1. The capital fund program costs are as follows:

	<u>SC16P002501-16</u>	<u>SC16P002501-17</u>	<u>Total</u>
Funds approved	\$ 2,730,936	\$ 3,044,834	\$ 5,775,770
Funds expended	<u>2,730,936</u>	<u>3,044,834</u>	<u>5,775,770</u>
Excess (deficiency) of funds approved	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Funds advanced	\$ 2,730,936	\$ 2,297,007	\$ 5,027,943
Funds expended	<u>2,730,936</u>	<u>3,044,834</u>	<u>5,775,770</u>
Excess (deficiency) of funds advanced	<u>\$ -</u>	<u>\$ (747,827)</u>	<u>\$ (747,827)</u>
2. Costs incurred during the current audit period	<u>\$ 463,507</u>	<u>\$ 2,995,155</u>	<u>\$ 3,458,662</u>

3. All costs have been paid and all related liabilities have been discharged through payment.
4. The Actual Modernization Cost Certificate, submitted to HUD, is in agreement with the Authority's records.

See auditor's report.

Housing Authority of the City of Columbia
Columbia, South Carolina

Statements of Capital Fund Program Costs - Uncompleted

June 30, 2019

Annual Contributions Contract A-2392

1. The capital fund program costs are as follows:

	<u>SC16P002501-18</u>	<u>SC16P002501-19</u>	<u>Total</u>
Funds approved	\$ 4,425,749	\$ 4,606,405	\$ 9,032,154
Funds expended	<u>217,258</u>	<u>-</u>	<u>217,258</u>
Excess (deficiency) of funds approved	<u>\$ 4,208,491</u>	<u>\$ 4,606,405</u>	<u>\$ 8,814,896</u>
 Funds advanced	 \$ 20,854	 \$ -	 \$ 20,854
Funds expended	<u>217,258</u>	<u>-</u>	<u>217,258</u>
Excess (deficiency) of funds advanced	<u>\$ (196,404)</u>	<u>\$ -</u>	<u>\$ (196,404)</u>
 2. Costs incurred during the current audit period	 <u>\$ 196,404</u>	 <u>\$ -</u>	 <u>\$ 196,404</u>

See auditor's report.

Housing Authority of the City of Columbia
Columbia, South Carolina

Schedule of Authority's Proportionate Share of the Net Pension Liability

SCRS Pension Plan

Last 5 Fiscal Years *

	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>Restated 2015</u>
Authority's proportion of the net pension liability (asset)	0.045977%	0.045376%	0.043625%	0.044305%	0.043263%
Authority's proportionate share of the net pension liability (asset)	\$ 10,301,940	\$ 10,214,867	\$ 9,318,236	\$ 8,402,657	\$ 7,448,454
Authority's covered-employee payroll	\$ 4,959,132	\$ 4,767,464	\$ 4,563,800	\$ 4,224,502	\$ 4,148,065
Authority's proportionate share of the net pension liability (asset) as a percentage of its covered-employee payroll	207.74%	214.26%	204.18%	198.90%	179.56%
Plan fiduciary net position as a percentage of the total pension liability	54.10%	53.30%	52.90%	57.00%	59.90%

Note to Schedule:

* This schedule is intended to show information for 10 years. Additional years will be displayed as they become available.

See auditor's report.

Housing Authority of the City of Columbia
Columbia, South Carolina

Schedule of Authority Contributions

SCRS Pension Plan

Last 5 Fiscal Years *

	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>2015</u>
Contractually required contribution	\$ 714,611	\$ 529,250	\$ 527,575	\$ 467,230	\$ 452,139
Contributions in relation to the contractually required contribution	<u>(714,611)</u>	<u>(529,250)</u>	<u>(527,575)</u>	<u>(467,230)</u>	<u>(452,139)</u>
Contribution deficiency (excess)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Authority's covered-employee payroll	\$ 4,959,132	\$ 4,767,464	\$ 4,563,800	\$ 4,224,502	\$ 4,148,065
Contributions as a percentage of covered-employee payroll	14.41%	11.10%	11.56%	11.06%	10.90%

Note to Schedule:

* This schedule is intended to show information for 10 years. Additional years will be displayed as they become available.

See auditor's report.

Housing Authority of the City of Columbia
Columbia, South Carolina

REQUIRED SUPPLEMENTARY INFORMATION
OTHER POSTEMPLOYMENT BENEFITS (OPEB) - HEALTHCARE
SCHEDULE OF CHANGES IN NET OPEB LIABILITY AND RELATED RATIOS

June 30, 2019 and 2018 *

	<u>2019</u>	<u>2018</u>
Total OPEB Liability		
Service Cost at end of year	\$ 167,244	\$ 195,882
Interest	234,809	210,648
Differences between expected and actual	(24,694)	(14,973)
Changes of assumptions	(380,208)	(729,698)
Changes of benefit terms	-	-
Benefit payments	<u>(62,334)</u>	<u>(66,447)</u>
Net change in total OPEB liability	(65,183)	(404,588)
Total OPEB Liability - beginning of year	<u>6,626,665</u>	<u>7,031,253</u>
Total OPEB Liability - end of year	<u><u>\$ 6,561,482</u></u>	<u><u>\$ 6,626,665</u></u>
Covered employee payroll	\$ 5,699,537	\$ 5,699,537
Net OPEB liability as a percentage of covered employee payroll	115.12%	116.27%

Note to Schedule:

* This schedule is intended to show information for 10 years. Additional years will be displayed as they become available.

See auditor's report.

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL
REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN
ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

Board of Commissioners
Housing Authority of the City of Columbia
Columbia, South Carolina

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standard* issued by the Comptroller General of the United States, the financial statements of the business-type activities and the aggregate discretely presented component units of the Housing Authority of the City of Columbia (the "Authority"), as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated February 24, 2020.

Our report includes a reference to other auditors who audited the financial statements of Celia Saxon I, LP and Celia Saxon II, LP (two discretely presented component units combined with Lorick Place, LLC collectively referred to as the "Discrete Component Units"), as described in our report on the Authority's financial statements. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors. The financial statements of the Discrete Component Units were not audited in accordance with *Government Auditing Standards*.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Authority's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be a material weakness. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

We noted certain matters that we reported to management of the Authority in a separate letter dated February 24, 2020.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in black ink that reads "Barton, Gonzalez & Myers, P.A." in a cursive script.

Barton, Gonzalez & Myers, P.A.
Certified Public Accountants
February 24, 2020



**Barton,
Gonzalez
& Myers, P.A.**
Certified Public Accountants

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**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR
PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE
REQUIRED BY THE UNIFORM GUIDANCE**

Board of Commissioners
Housing Authority of the City of Columbia
Columbia, South Carolina

Report on Compliance for Each Major Federal Program

We have audited the Housing Authority of the City of Columbia's (the "Authority") compliance with the types of compliance requirements described in the *OMB Circular Compliance Supplement* that could have a direct and material effect on each of the Authority's major federal programs for the year ended June 30, 2019. The Authority's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the Authority's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the Authority's compliance.

Basis for Qualified Opinion on Housing Voucher Cluster Program

As described in the accompanying schedule of findings and questioned costs, the Authority did not comply with requirements regarding the Housing Voucher Cluster (for CFDA 14.871 Section 8 Housing Choice Vouchers and for 14.879 Mainstream Vouchers) as described in finding numbers 2019-001 for Eligibility, 2019-002 to 2019-004 for Special Tests and Provisions and 2019-005 for Reporting. Compliance with such requirements is necessary, in our opinion, for the Authority to comply with the requirements applicable to that program.

Qualified Opinion on Housing Voucher Cluster Program

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion paragraph, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on the Housing Voucher Cluster Program for the year ended June 30, 2019.

Basis for Qualified Opinion on Continuum of Care Program

As described in the accompanying schedule of findings and questioned costs, the Authority did not comply with requirements regarding CFDA 14.267 Continuum of Care Program as described in finding number 2019-006 for Special Tests and Provisions. Compliance with such requirements is necessary, in our opinion, for the Authority to comply with the requirements applicable to that program.

Qualified Opinion on Continuum of Care Program

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion paragraph, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on the Continuum of Care Program for the year ended June 30, 2019.

Other Matters

The Authority's response to the noncompliance findings identified in our audit is described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control Over Compliance

Management of the Authority is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Authority's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2019-001, 2019-002, 2019-003, 2019-004, 2019-005, and 2019-006 to be material weaknesses.

A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

The Authority's response to the internal control over compliance findings identified in our audit is described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

A handwritten signature in black ink that reads "Barton, Gonzalez & Myers, P.A." in a cursive script.

Barton, Gonzalez & Myers, P.A.
Certified Public Accountants
February 24, 2020

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

Section I - Summary of Auditor's Results:

Financial Statements

Type of report issued on the financial statements:	Unmodified
Internal control over financial reporting:	
Material weakness(es) identified?	No
Significant deficiencies identified not considered to be material weaknesses?	None Reported
Noncompliance material to the financial statements noted?	No

Federal Awards

Internal controls over major program:	
Material weakness(es) identified?	Yes
Significant deficiencies identified not considered to be material weaknesses?	No
Type of report issued on the compliance for major program:	Qualified
Any audit findings disclosed that are required to be reported in accordance with 2 CFR section 200.516(a)?	Yes
Identification of major program:	<u>Housing Voucher Cluster (Section 8)</u>
	14.871 Section 8 Housing Choice Vouchers
	14.879 Mainstream Vouchers (MP)
	14.267 Continuum of Care Program
Dollar threshold used to distinguish between Type A and Type B programs:	\$1,225,868
Did the Authority qualify as a low-risk auditee?	No

Section II - Financial Statement Findings:

There were no findings related to this area for the period ended June 30, 2019.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

Section III - Federal Awards:

The findings related to this area for the year ended June 30, 2019 are as follows:

2019-001 Eligibility – Tenant Files

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: Out of a total tenant population of approximately 3,400 vouchers, 25 files were selected for testing. Exceptions were noted as follows:

- 2 tenant files had no support for the tenant's annual or interim re-certifications for the 2019 fiscal year. As a result, tenant's income, assets, deductions, expenses and allowances were not verified and the EIV report was not obtained. As such, HAP payments may be incorrect and the Form 50058 may not be reporting correct data. In addition, tenant's eligibility in the Section 8 program could not be determined.
- 1 tenant file was missing a tenant application
- 1 tenant file did not have an established HAP contract between the Authority and the landlord.
- 1 tenant file where the HAP contract was not signed or dated by the landlord.
- 1 tenant file that did not have an established lease agreement between the tenant and the landlord.
- 1 tenant file was missing a signed lead paint form.
- 1 tenant file where the social security number was reported incorrectly on the Form 50058.
- 1 tenant file where the HAP rent should have been reported on the 50058 form for \$564 instead of \$476. The HAP rent of \$476 (as reported on the 50058 form) was miscalculated due to an incorrect utility allowance amount used and due to child care income not being verified in the current year annual recertification.

In addition, we also noted as part of new admissions testing (25 files tested out of approximately 425 new admissions) the following:

- 9 tenant files where the tenants signed the 214 Affidavit forms 6-8 months after the tenants move-in date.
- 1 tenant file where the 214 form was never signed by the tenant.
- 4 tenant files where the criminal backgrounds were performed on VASH applicants.
- 1 tenant file where the Request for Tenancy Addendum was not executed within the voucher period.
- 1 tenant file where a voucher was issued for the incorrect bedroom size based on the family size. However, the 50058 form shows that the authority is using the correct voucher size (payment standard) for the family.
- 2 tenant files where the rent reasonableness procedures were never performed or the forms are missing from the tenant files.
- 3 tenant files where the HAP contract was signed 4-6 months after the tenant's move-in date.
- 2 tenant files where the HAP contract was not signed or dated by the landlord.
- 1 tenant file where the signature page of the HAP contract is missing from the tenant file.
- 1 tenant file where the passed inspection form is missing from the tenant file.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-001 Eligibility – Tenant Files (Continued)

Criteria: 24 CFR 982.516 requires internal controls to be in place to ensure compliance with HUD requirements, as well as complete and accurate tenant files. In addition, the Authority's administrative plan also requires following proper procedures for determination of HAP and documentation in the tenant files.

Questioned Costs: None.

Effect: The Authority is not in compliance with all of the HUD requirements regarding eligibility and tenant recertification, which could result in incorrect total tenant payments for rent and HAP payments to landlords.

Cause: During the last 6 months of the fiscal year, Section 8 personnel appeared to be overtasked by maintaining the Section 8 program while simultaneously issuing tenant protection vouchers for Public Housing tenants impacted by the condemnation of the Allen Benedict Court property. As such, procedures to ensure compliance with all of the HUD requirements were not being carefully followed.

Auditor's Recommendation: The Authority should correct the deficiencies noted in the tested files and utilize an ongoing quality control review process on the entire tenant population to ensure proper compliance with the requirements related to tenant eligibility. Ongoing staff training and timely management reviews should be utilized to ensure staff are aware of acceptable procedures. In addition, the Authority should review staffing levels, skill sets and case load.

Views of Responsible Officials of the Auditee: New leadership at the Authority recognized the deficiencies in the tenant files and limited staff knowledge and skills. The Director of the Housing Choice Voucher program has been replaced with an extremely qualified Leader for the department. Nan McKay and Associates conducted a skill assessment of all staff and an agency wide reorganization is underway. A Comprehensive Training Plan and Quality Control Program will also be implemented in 2020. Corrections required in the identified files will be completed by March 31, 2020.

2019-002 Special Tests and Provisions - Housing Quality Standard (HQS) Failed Inspections

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: Out of a population of approximately 590 failed inspections, 25 inspections were selected for testing, but stopped testing after 19 files after it was determined this would be a finding. Exceptions were noted as follows:

- 1 file where an abatement never occurred for the months of November and December 2018.
- 1 file where an abatement never occurred for the month of July 2019.
- 1 file where there was no documentation showing that the unit passed inspection and an abatement never occurred 30 days after the initial failed inspection.
- 1 file where an abatement never occurred for the months of February to April 2019.
- 1 file where the re-inspection did not occur until two and a half months after the initial failed inspection. In addition, an abatement never occurred for the months of August and September 2019.
- 1 file where the re-inspection did not occur until 40 days after the initial failed inspection.
- 1 file where the re-inspection did not occur until 6 months after the initial failed inspection. In addition, an abatement never occurred for the months of October 2018 to February 2019.
- 1 file where the re-inspection never occurred and an abatement of the HAP rent never occurred.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-002 Special Tests and Provisions - Housing Quality Standard (HQS) Failed Inspections (Continued)

Criteria: HUD regulations require that units leased to a family are inspected at least annually to determine if the unit meets Housing Quality Standards (HQS). In addition, inspections must be documented on a unit inspection report. For units that fail inspections, any life threatening deficiencies must be corrected within 24 hours and all other deficiencies must be corrected within 30 calendar days or within a specified PHA-approved extension. If the deficiency is not corrected, the HAP payment must be abated no later than the first of the following month.

Questioned Costs: None.

Effect: The Authority is not in compliance with applicable HUD regulations.

Cause: During the last 6 months of the fiscal year, Section 8 personnel appeared to be overtasked by maintaining the Section 8 program while simultaneously issuing tenant protection vouchers for Public Housing tenants impacted by the condemnation of the Allen Benedict Court property. As such, procedures to ensure compliance with all of the HUD requirements were not being carefully followed.

Auditor's Recommendation: The Authority should make sure that failed HQS inspections are properly documented on the inspection report and done within the required time frame or are properly abated. If the Authority doesn't do the inspection within the required time frame and doesn't abate the HAP payment, the Authority should document the reason in order to determine if it was reasonable. Also, the Authority should assure that all critical repairs for life threatening deficiencies are completed within 24 hours.

Views of Responsible Officials of the Auditee: New leadership at the Authority recognized the deficiencies in the HQS inspections process and limited staff knowledge and skills. HQS inspections will be out-sourced to a Professional Inspections firm in 2020. The independent vendor will also be required to provide a Quality Control Program to include reinspection of a minimum of 5% of all inspections with monthly reports of all results to the Authority. The Authority will also randomly select a sample of the QC inspections and conduct monitoring inspections for an additional layer of QC. Corrections required in the identified files will be completed by March 31, 2020.

2019-003 Special Tests and Provisions: Quality Control Inspections

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: The Authority was required to perform 38 quality control inspections and conducted the required amount. However, 9 quality control inspections were performed outside the required 90-day time frame. In addition, all of the quality control inspections were selected from initial inspections occurring in the months of March through June 2019. No quality control inspections occurred for the months of July 2018 through February 2019.

Criteria: The PHA must inspect the unit leased to a family at least annually to determine if the unit meets Housing Quality Standards (HQS) and the PHA must conduct quality control re-inspections. The PHA must prepare a unit inspection report (24 CFR sections 982.158(d) and 982.405(b)). The re-inspection must occur within 90 days of the original inspection.

Questioned Costs: None.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-003 Special Tests and Provisions: Quality Control Inspections (Continued)

Effect: The Authority is not in compliance with Housing Quality Standards (HQS) which may result in unit HQS deficiencies and unsafe living accommodations.

Cause: The Authority did not have adequate internal controls in place over Housing Quality Standards (HQS) and did not perform the re-inspection timely.

Auditor's Recommendation: The Authority should increase training to employees to insure that the Authority is in compliance with HUD rules for quality control re-inspections. In addition, the Authority should assure that proper records are maintained for inspections and quality control re-inspections.

Views of Responsible Officials of the Auditee: New leadership at the Authority recognized the deficiencies in the HQS inspections process and limited staff knowledge and skills. HQS inspections will be out-sourced to a Professional Inspections firm in 2020. The independent vendor will also be required to provide a Quality Control Program to include reinspection of a minimum of 5% of all inspections with monthly reports of all results to the Authority. The Authority will also randomly select a sample of the QC inspections and conduct monitoring inspections for an additional layer of QC. Corrections required in the identified files will be completed by March 31, 2020.

2019-004 Special Tests and Provisions: Utility Allowance Study

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: A utility allowance study was not conducted for the 2019 fiscal year and the utility allowance rates used were based on a study conducted in 2017.

Criteria: The PHA must maintain an up-to-date utility allowance schedule. The PHA must review utility rate data for each utility category each year and must adjust its utility allowance schedule if there has been a rate change of 10 percent or more for a utility category or fuel type since the last time the utility allowance schedule was revised.

Questioned Costs: None.

Effect: The Authority is not in compliance with HUD regulations regarding utility allowances and, as such, the tenant rents calculated may not be accurate.

Cause: The Authority did not have adequate internal controls in place over the determination of utility allowance schedule amounts and a recent study of the utility rates was not performed.

Auditor's Recommendation: The Authority should increase training to employees to insure that the Authority is in compliance with HUD rules for utility allowance determination. In addition, the Authority should assure that the utility allowance schedule is modified if a rate change of 10% or more for utilities occurred by performing a study and documenting the results of the study.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-004 Special Tests and Provisions: Utility Allowance Study (Continued)

Views of Responsible Officials of the Auditee: New leadership at the Authority recognized the deficiencies in establishing and updating utility allowance studies and schedules. Action was taken to contract with the Nelrod Company, a national company with expertise in conducting the required HUD utility allowance studies. As of the date of this response, the study has been completed and appropriate utility allowances have been implemented. Corrections required in the identified files will be completed by March 31, 2020.

2019-005 Reporting: HCV SEMAP

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Material Weakness in Internal Control, Material Noncompliance

Condition: The Authority did not have adequate controls over the Section 8 Management Assessment Program (SEMAP) reporting to assure that the Authority is in compliance with this requirement. The self assessment did not include sufficient amounts for testing and the documentation provided for the SEMAP reporting did not appear to substantiate some of the SEMAP results.

For 3 indicators, the Authority did not select sufficient amounts to test and/or the Authority's results did not agree with the self assessment score as follows:

- Indicator 2 – Rent Reasonableness: The Authority was required to select a sample size of 38 tenant files to determine whether or not rent reasonableness procedures are being followed. The PHA only selected 35 tenant files for testing.
 - From the tenant files selected by the Authority, there was 1 file where the tenant's unit was not comparable to the other comparable units.
 - From the tenant files selected by the Authority, there were 3 files where there was no support of the rent comparable form.

Based on the above, the Authority should have reported a total of 15 points and not 20 points on the SEMAP for this indicator.

- Indicator 5 – HQS Quality Control: The Authority selected a sample size of 38 tenant files for their quality control inspections. However, the sample only included inspections from March 2019 – June 2019. The PHA should select inspections throughout the year for testing. In addition, there were 9 quality control inspections that occurred after the 90 day time frame.

Based on the above, the Authority should have reported 0 points and not 5 points on the SEMAP.

- Indicator 6 – HQS Enforcements: The Authority was required to select a sample size of 38 tenant files to determine whether or not HQS enforcement procedures are being performed. The PHA only selected 5 inspections for testing.

Based on the finding above, the Authority should have reported 0 points and not 10 points.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-005 Reporting: HCV SEMAP (Continued)

Criteria: The Section 8 Management Assessment Program (SEMAP) is a self-assessment tool that measures the performance of public housing agencies (PHAs) that administer the housing choice voucher program in 14 key areas. SEMAP helps HUD target monitoring and assistance to PHA programs that need the most improvement. The 14 indicators of performance show whether PHAs help eligible families to afford decent rental units at a reasonable subsidy cost as intended by Federal housing legislation. HUD annually assigns each PHA a rating on each of the 14 indicators and an overall performance rating of high, standard, or troubled.

Questioned Costs: None.

Effect: The Authority does not appear to be in compliance with HCV SEMAP reporting requirements and as such is not reporting accurate information to HUD which could change the performance rating.

Cause: The Authority did not have sufficient internal controls to assure accurate SEMAP reporting.

Auditor's Recommendation: We recommend that the Authority design and implement internal controls over SEMAP to assure the Authority is in compliance with HUD requirements.

Views of Responsible Officials of the Auditee: New leadership at the Authority recognized the deficiencies in tracking and monitoring the SEMAP performance indicators. The Director of the Housing Choice Voucher program has been replaced with an extremely qualified Leader for the department. An internal confirmatory review will be conducted by Management prior to submission of the annual SEMAP certification. The random sample for the applicable indicators will be selected by Executive Management outside the HCV Department and the corresponding SEMAP PIC reports will be monitored on a quarterly basis to address any outstanding issues prior to year end.

2019-006 Special Tests and Provisions: Tenant File Testing and Reasonable Rental Rates

Continuum of Care Program – CFDA Number 14.267

Material Weakness in Internal Control, Material Noncompliance

Condition: In our review of 6 Continuum of Care tenant files (out of population of 60 tenants), we noted the following:

- 6 files reviewed where there was no evidence of rent reasonableness being performed on the units.
- 6 files where no evidence of HQS inspections being performed during the fiscal year.
- 3 files where there was no documentation of the initial unit inspection at move-in being performed.
- 5 files where the tenant sublease agreement was not in the file.
- 3 files where the tenant rental income calculation was not in the file and we were not able to verify the tenant rent.
- 1 file where there was an error in the tenant rent calculation which resulted in the tenant paying \$301 per month (instead of the correct tenant rent amount of \$366).
- 1 file where there was no documentation in the file of case management services being provided.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Schedule of Findings and Questioned Costs

June 30, 2019

2019-006 Special Tests and Provisions: Tenant File Testing and Reasonable Rental Rates (Continued)

Criteria: The Continuum of Care (CoC) Program is designed to (1) promote community-wide commitment to the goal of ending homelessness; (2) provide funding for efforts by non-profit providers, States, and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; (3) promote access to and effective utilization of mainstream programs by homeless individuals and families; and (4) optimize self-sufficiency among individuals and families experiencing homelessness. Internal controls should be in place to ensure compliance with HUD requirements, as well as complete and accurate tenant files.

Where grants are used to pay rent for individual housing units, the rent paid must be reasonable in relation to rents being charged for comparable units taking into account relevant features. In addition, the rents may not exceed rents currently being charged by the same owner for comparable unassisted units, and the portion of rents paid with grant funds may not exceed HUD-determined fair market rents.

Questioned Costs: None.

Effect: The Authority is not in compliance with all of the HUD requirements regarding rent reasonableness, HQS standards and tenant certification and recertification, which could result in incorrect total tenant payments for rent and payments to landlords.

Cause: Procedures to ensure compliance with all of the HUD requirements were not being carefully followed.

Auditor's Recommendation: The Authority should correct the deficiencies noted in the tested files and utilize an ongoing quality control review process on the entire tenant population to ensure proper compliance with the requirements related to tenant certification and recertification, rent reasonableness and HQS inspections. Ongoing staff training and timely management reviews should be utilized to ensure staff is aware of acceptable procedures. In addition, the Authority should review staffing levels, skill sets and case load.

Views of Responsible Officials of the Auditee: Procedures described above will also be implemented for the COC Programs to assure compliance with all program regulatory requirements. Corrections required in the identified files will be completed by March 31, 2020.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Summary Schedule of Prior Year Findings

June 30, 2019

The prior audit report for the year ended June 30, 2018 contained the following audit findings:

2018-001 Inadequate Controls Over Financial Reporting
Material Weakness in Internal Control

Condition: The Authority did not have adequate controls over the financial reporting process to detect material misstatements. As a result of the audit, several material adjustments were posted including a depreciation adjustment of \$793,534 and an adjustment to write-off demolition costs of \$1,614,289 (that were originally capitalized). In addition, other entries were recorded (including recording the GASB 75 OPEB liability and prior period effect as proposed by the Authority).

Recommendation: The Authority should establish controls to ensure that appropriate year-end adjustments are recorded so that the financial statements are fairly presented.

Status

This finding has been corrected and will not be repeated.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Corrective Action Plan

June 30, 2019

The following is the corrective action planned by the Authority regarding the current finding:

Finding

No.

2019-001 Eligibility – Tenant Files

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: Out of a total tenant population of approximately 3,400 vouchers, 25 files were selected for testing. Exceptions were noted as follows:

- 2 tenant files had no support for the tenant's annual or interim re-certifications for the 2019 fiscal year. As a result, tenant's income, assets, deductions, expenses and allowances were not verified and the EIV report was not obtained. As such, HAP payments may be incorrect and the Form 50058 may not be reporting correct data. In addition, tenant's eligibility in the Section 8 program could not be determined.
- 1 tenant file was missing a tenant application
- 1 tenant file did not have an established HAP contract between the Authority and the landlord.
- 1 tenant file where the HAP contract was not signed or dated by the landlord.
- 1 tenant file that did not have an established lease agreement between the tenant and the landlord.
- 1 tenant file was missing a signed lead paint form.
- 1 tenant file where the social security number was reported incorrectly on the Form 50058.
- 1 tenant file where the HAP rent should have been reported on the 50058 form for \$564 instead of \$476. The HAP rent of \$476 (as reported on the 50058 form) was miscalculated due to an incorrect utility allowance amount used and due to child care income not being verified in the current year annual recertification.

In addition, we also noted as part of new admissions testing (25 files tested out of approximately 425 new admissions) the following:

- 9 tenant files where the tenants signed the 214 Affidavit forms 6-8 months after the tenants move-in date.
- 1 tenant file where the 214 form was never signed by the tenant.
- 4 tenant files where the criminal backgrounds were performed on VASH applicants.
- 1 tenant file where the Request for Tenancy Addendum was not executed within the voucher period.
- 1 tenant file where a voucher was issued for the incorrect bedroom size based on the family size. However, the 50058 form shows that the authority is using the correct voucher size (payment standard) for the family.
- 2 tenant files where the rent reasonableness procedures were never performed or the forms are missing from the tenant files.
- 3 tenant files where the HAP contract was signed 4-6 months after the tenant's move-in date.
- 2 tenant files where the HAP contract was not signed or dated by the landlord.
- 1 tenant file where the signature page of the HAP contract is missing from the tenant file.
- 1 tenant file where the passed inspection form is missing from the tenant file.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Corrective Action Plan

June 30, 2019

2019-001 Eligibility – Tenant Files (Continued)

Auditor's Recommendation: The Authority should correct the deficiencies noted in the tested files and utilize an ongoing quality control review process on the entire tenant population to ensure proper compliance with the requirements related to tenant eligibility. Ongoing staff training and timely management reviews should be utilized to ensure staff are aware of acceptable procedures. In addition, the Authority should review staffing levels, skill sets and case load.

Action Taken: New leadership at the Authority recognized the deficiencies in the tenant files and limited staff knowledge and skills. The Director of the Housing Choice Voucher program has been replaced with an extremely qualified Leader for the department. Nan McKay and Associates conducted a skill assessment of all staff and an agency wide reorganization is underway. A Comprehensive Training Plan and Quality Control Program will also be implemented in 2020. Corrections required in the identified files will be completed by March 31, 2020.

2019-002 Special Tests and Provisions - Housing Quality Standard (HQS) Failed Inspections

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: Out of a population of approximately 590 failed inspections, 25 inspections were selected for testing, but stopped testing after 19 files after it was determined this would be a finding. Exceptions were noted as follows:

- 1 file where an abatement never occurred for the months of November and December 2018.
- 1 file where an abatement never occurred for the month of July 2019.
- 1 file where there was no documentation showing that the unit passed inspection and an abatement never occurred 30 days after the initial failed inspection.
- 1 file where an abatement never occurred for the months of February to April 2019.
- 1 file where the re-inspection did not occur until two and a half months after the initial failed inspection. In addition, an abatement never occurred for the months of August and September 2019.
- 1 file where the re-inspection did not occur until 40 days after the initial failed inspection.
- 1 file where the re-inspection did not occur until 6 months after the initial failed inspection. In addition, an abatement never occurred for the months of October 2018 to February 2019.
- 1 file where the re-inspection never occurred and an abatement of the HAP rent never occurred.

Auditor's Recommendation: The Authority should make sure that failed HQS inspections are properly documented on the inspection report, and done within the required time frame or are properly abated. If the Authority doesn't do the inspection within the required time frame and doesn't abate the HAP payment, the Authority should document the reason in order to determine if it was reasonable. Also, the Authority should assure that all critical repairs for life threatening deficiencies are completed within 24 hours.

Action Taken: New leadership at the Authority recognized the deficiencies in the HQS inspections process and limited staff knowledge and skills. HQS inspections will be out-sourced to a Professional Inspections firm in 2020. The independent vendor will also be required to provide a Quality Control Program to include reinspection of a minimum of 5% of all inspections with monthly reports of all results to the Authority. The Authority will also randomly select a sample of the QC inspections and conduct monitoring inspections for an additional layer of QC. Corrections required in the identified files will be completed by March 31, 2020.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Corrective Action Plan

June 30, 2019

2019-003 Special Tests and Provisions: Quality Control Inspections

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: The Authority was required to perform 38 quality control inspections and conducted the required amount. However, 9 quality control inspections were performed outside the required 90-day time frame. In addition, all of the quality control inspections were selected from initial inspections occurring in the months of March through June 2019. No quality control inspections occurred for the months of July 2018 through February 2019.

Auditor's Recommendation: The Authority should increase training to employees to insure that the Authority is in compliance with HUD rules for quality control re-inspections. In addition, the Authority should assure that proper records are maintained for inspections and quality control re-inspections.

Action Taken: New leadership at the Authority recognized the deficiencies in the HQS inspections process and limited staff knowledge and skills. HQS inspections will be out-sourced to a Professional Inspections firm in 2020. The independent vendor will also be required to provide a Quality Control Program to include reinspection of a minimum of 5% of all inspections with monthly reports of all results to the Authority. The Authority will also randomly select a sample of the QC inspections and conduct monitoring inspections for an additional layer of QC. Corrections required in the identified files will be completed by March 31, 2020.

2019-004 Special Tests and Provisions: Utility Allowance Study

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Mainstream Vouchers – CFDA 14.879

Material Weakness in Internal Control, Material Noncompliance

Condition: A utility allowance study was not conducted for the 2019 fiscal year and the utility allowance rates used were based on a study conducted in 2017.

Auditor's Recommendation: The Authority should increase training to employees to insure that the Authority is in compliance with HUD rules for utility allowance determination. In addition, the Authority should assure that the utility allowance schedule is modified if a rate change of 10% or more for utilities occurred by performing a study and documenting the results of the study.

Action Taken: New leadership at the Authority recognized the deficiencies in establishing and updating utility allowance studies and schedules. Action was taken to contract with the Nelrod Company, a national company with expertise in conducting the required HUD utility allowance studies. As of the date of this response, the study has been completed and appropriate utility allowances have been implemented. Corrections required in the identified files will be completed by March 31, 2020.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Corrective Action Plan

June 30, 2019

2019-005 Reporting: HCV SEMAP

Section 8 Housing Choice Vouchers Program – CFDA Number 14.871

Material Weakness in Internal Control, Material Noncompliance

Condition: The Authority did not have adequate controls over the Section 8 Management Assessment Program (SEMAP) reporting to assure that the Authority is in compliance with this requirement. The self assessment did not include sufficient amounts for testing and the documentation provided for the SEMAP reporting did not appear to substantiate some of the SEMAP results.

For 3 indicators, the Authority did not select sufficient amounts to test and/or the Authority's results did not agree with the self assessment score as follows:

- Indicator 2 – Rent Reasonableness: The Authority was required to select a sample size of 38 tenant files to determine whether or not rent reasonableness procedures are being followed. The PHA only selected 35 tenant files for testing.
 - From the tenant files selected by the Authority, there was 1 file where the tenant's unit was not comparable to the other comparable units.
 - From the tenant files selected by the Authority, there were 3 files where there was no support of the rent comparable form.

Based on the above, the Authority should have reported a total of 15 points and not 20 points on the SEMAP for this indicator.

- Indicator 5 – HQS Quality Control: The Authority selected a sample size of 38 tenant files for their quality control inspections. However, the sample only included inspections from March 2019 – June 2019. The PHA should select inspections throughout the year for testing. In addition, there were 9 quality control inspections that occurred after the 90 day time frame.

Based on the above, the Authority should have reported 0 points and not 5 points on the SEMAP.

- Indicator 6 – HQS Enforcements: The Authority was required to select a sample size of 38 tenant files to determine whether or not HQS enforcement procedures are being performed. The PHA only selected 5 inspections for testing.

Based on the finding above, the Authority should have reported 0 points and not 10 points.

Auditor's Recommendation: We recommend that the Authority design and implement internal controls over SEMAP to assure the Authority is in compliance with HUD requirements.

Action Taken: New leadership at the Authority recognized the deficiencies in tracking and monitoring the SEMAP performance indicators. The Director of the Housing Choice Voucher program has been replaced with an extremely qualified Leader for the department. An internal confirmatory review will be conducted by Management prior to submission of the annual SEMAP certification. The random sample for the applicable indicators will be selected by Executive Management outside the HCV Department and the corresponding SEMAP PIC reports will be monitored on a quarterly basis to address any outstanding issues prior to year end..

HOUSING AUTHORITY OF THE CITY OF COLUMBIA
Columbia, South Carolina

Corrective Action Plan

June 30, 2019

2019-006 Special Tests and Provisions: Tenant File Testing and Reasonable Rental Rates

Continuum of Care Program – CFDA Number 14.267

Material Weakness in Internal Control, Material Noncompliance

Condition: In our review of 6 Continuum of Care tenant files (out of population of 60 tenants), we noted the following:

- 6 files reviewed where there was no evidence of rent reasonableness being performed on the units.
- 6 files where no evidence of HQS inspections being performed during the fiscal year.
- 3 files where there was no documentation of the initial unit inspection at move-in being performed.
- 5 files where the tenant sublease agreement was not in the file.
- 3 files where the tenant rental income calculation was not in the file and we were not able to verify the tenant rent.
- 1 file where there was an error in the tenant rent calculation which resulted in the tenant paying \$301 per month (instead of the correct tenant rent amount of \$366).
- 1 file where there was no documentation in the file of case management services being provided.

Auditor's Recommendation: The Authority should correct the deficiencies noted in the tested files and utilize an ongoing quality control review process on the entire tenant population to ensure proper compliance with the requirements related to tenant certification and recertification, rent reasonableness and HQS inspections. Ongoing staff training and timely management reviews should be utilized to ensure staff is aware of acceptable procedures. In addition, the Authority should review staffing levels, skill sets and case load.

Action Taken: Procedures described above will also be implemented for the COC Programs to assure compliance with all program regulatory requirements. Corrections required in the identified files will be completed by March 31, 2020..

Effective Date: February 24, 2020

Contact Information

Ivory Mathews, Interim Executive Director
Housing Authority of the City of Columbia
1917 Harden Street
Columbia, South Carolina 29204
(803) 254-3886

Housing Authority of the City of Columbia
Columbia, South Carolina

Schedule of Expenditures of Federal Awards

For the twelve months ended June 30, 2019

<u>FEDERAL GRANTOR</u>	<u>Federal CFDA Number</u>	<u>Program or Award Amount</u>	<u>Disbursements or Expenditures</u>
U. S. Department of HUD			
Housing Voucher Cluster Program:			
Section 8 Housing Choice Voucher	* + 14.871	\$ 26,673,564	\$ 26,673,564
Mainstream Vouchers	* + 14.879	192,564	192,564
Subtotal Housing Voucher Cluster		26,866,128	26,866,128
Public Housing:			
Public and Indian Housing	* 14.850	8,484,172	8,484,172
Public Housing Capital Fund	* 14.872	14,807,924	3,655,066
Resident Opportunities Supportive Services	** 14.870	186,936	186,936
Continuum of Care Program	** + 14.267	591,823	591,823
Section 8 Moderate Rehabilitation	** 14.856	600,148	600,148
Housing Opportunities for Persons with AIDS	** 14.241	412,142	412,142
Other Federal Agencies			
FEMA Disaster Aid (Public Assistance)	** 97.036	38,503	38,503
USDA Summer Food Program	** 10.559	27,356	27,356
Total		<u>\$ 52,015,132</u>	<u>\$ 40,862,274</u>

Basis of Accounting and Presentation:

This schedule includes the federal grant activity of the Housing Authority of the City of Columbia and is presented on the full accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of the Uniform Guidance (Title 2 U.S. Code of Federal Regulations (CFR), Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of the basic financial statements. The Authority has not elected to use the 10% de minimis cost rate.

Reconciliation of Total Federal Awards Expenditures to the Financial Data Schedule (FDS):

FDS Line 70600 HUD PHA Operating Grants	\$ 38,464,336
FDS Line 70610 HUD Capital Grants	2,332,079
FDS Line 70800 Other Government Grants (CFDA #10.559)	27,356
FDS Line 70800 Other Government Grants (Other Federal Program 1)	38,503
	<u>\$ 40,862,274</u>

- * Type A Program
- ** Type B Program
- + Major Program

See auditor's report.



**Barton,
Gonzalez
& Myers, P.A.**
Certified Public Accountants

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February 24, 2020

Ivory Mathews, Interim Executive Director
and Board of Commissioners
Housing Authority of the City of Columbia
1917 Harden Street
Columbia, South Carolina 29204

Dear Ms. Mathews and Board of Commissioners:

In planning and performing our audit of the financial statements of the Housing Authority of the City of Columbia for the year ended June 30, 2019, in accordance with auditing standards generally accepted in the United States of America, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the organization's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

However, during our audit we became aware of certain matters that are opportunities for strengthening internal controls and operating efficiency. This letter does not affect our report dated February 24, 2020, on the financial statements of the Housing Authority of the City of Columbia.

We will review the status of these comments during our next audit engagement. We have already discussed these comments and suggestions with various Authority personnel, and we will be pleased to discuss it in further detail at your convenience, to perform any additional study of this matter, or to assist you in implementing the recommendation. Our comments are summarized as follows:

PRIOR YEAR COMMENTS THAT CONTINUE TO APPLY:

HCV Tenant File Testing

The prior year management comment regarding HCV tenant file testing deficiencies is a finding in the current year. See finding 2019-001.

HCV Failed Inspection Testing

The prior year management comment regarding HCV failed inspection testing deficiencies is a finding in the current year. See finding 2019-002.

CURRENT YEAR COMMENTS:

Audit Readiness

We noted the Authority was not sufficiently prepared for the audit as significant adjustments and reclassifications to the unaudited FDS occurred after the unaudited FDS filing had been submitted and after the audit had begun. Not having accounting and financial amounts ready for audit has been a recurring issue over the last several years which has led to audit inefficiencies and additional time and effort on the audit. In planning for the future, we recommend that all audit related schedules be completed prior to submission of the unaudited FDS.

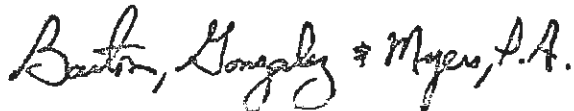
Payrate Documentation

As part of our payroll testing, we noted that the current approved payrates were not documented in the employee's personnel file. We recommend (as a best practice), to document the employee's current payrates and approval of those payrates in the employee's personnel file.

We wish to thank the Executive Director and her staff for their support and assistance during our audit.

This report is intended solely for the information and use of management, Board of Commissioners, others within the Authority, and the Department of Housing and Urban Development (HUD), and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

A handwritten signature in cursive script that reads "Barton, Gonzalez & Myers, P.A.".

Barton, Gonzalez & Myers, P.A.
Certified Public Accountants

Financial Data Schedule

HOUSING AUTHORITY OF THE CITY OF COLUMBIA (SC002)
COLUMBIA, SC

Entity Wide Balance Sheet Summary

Submission Type: Audited/Single Audit

Fiscal Year End: 06/30/2019

	Project Total	14.267 Continuum of Care Program	14.228 Community Development Block Grants/State's Program	10.559 Summer Food Service Program for Children	14.870 Resident Opportunity and Supportive Services	14.871 Housing Choice Vouchers	14.879 Mainstream Vouchers	6.1 Component Unit - Discretely Presented	6.2 Component Unit - Blended	14.866 Revitalization of Severely Distressed Public Housing	14.241 Housing Opportunities for Persons with AIDS	1 Business Activities	8 Other Federal Program 1	14.866 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	Subtotal	ELIM	Total
111 Cash - Unrestricted	\$178,735					\$596,578		\$312,108	\$300,856			\$25,223		\$233,093	\$1,229,720	\$2,876,312		\$2,876,312
112 Cash - Restricted - Modernization and Development								\$1,185,748						\$0		\$1,185,748		\$1,185,748
113 Cash - Other Restricted	\$260,478	\$216,270	\$284,401			\$219,954	\$99,127					\$116,829		\$0		\$1,197,059		\$1,197,059
114 Cash - Tenant Security Deposits	\$417,720		\$23					\$29,118	\$81,952		\$2,015	\$96,103		\$0		\$626,931		\$626,931
115 Cash - Restricted for Payment of Current Liabilities														\$0				
100 Total Cash	\$856,933	\$216,270	\$284,424	\$0	\$0	\$816,532	\$99,127	\$1,526,974	\$382,807	\$0	\$2,015	\$238,155	\$0	\$233,093	\$1,229,720	\$5,886,050	\$0	\$5,886,050
121 Accounts Receivable - PHA Projects														\$0				
122 Accounts Receivable - HUD Other Projects	\$944,230	\$39,015			\$4,190	\$213,964	\$0				\$0			\$0		\$1,201,399		\$1,201,399
124 Accounts Receivable - Other Government		\$8,992		\$3,314							\$74,715			\$0	\$156,466	\$243,507		\$243,507
125 Accounts Receivable - Miscellaneous	\$33,096	\$0						\$813	\$900,763			\$0		\$0	\$2,548	\$937,220		\$937,220
126 Accounts Receivable - Tenants	\$122,819		\$1,480					\$6,774	\$15,722		\$634	\$144,910		\$0		\$292,339		\$292,339
126.1 Allowance for Doubtful Accounts - Tenants	-\$19,312	\$0	-\$80					\$0	\$0	\$0	-\$342	-\$12,656		\$0	\$0	-\$32,390		-\$32,390
126.2 Allowance for Doubtful Accounts - Other	\$0	\$0		\$0	\$0	\$0	\$0	\$0	-\$132,450	\$0	\$0	\$0		\$0	\$0	-\$132,450		-\$132,450
127 Notes, Loans, & Mortgages Receivable - Current														\$0				
128 Fraud Recovery														\$0				
128.1 Allowance for Doubtful Accounts - Fraud														\$0				
129 Accrued Interest Receivable	\$31,879								\$2,495			\$9,091		\$0	\$20,092	\$63,557		\$63,557
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$1,112,712	\$48,007	\$1,400	\$3,314	\$4,190	\$213,964	\$0	\$7,587	\$786,530	\$0	\$75,007	\$141,345	\$0	\$0	\$179,126	\$2,573,182	\$0	\$2,573,182
131 Investments - Unrestricted	\$6,715,683								\$586,044			\$2,467,531		\$0	\$168,711	\$9,837,969		\$9,837,969
132 Investments - Restricted														\$0				
135 Investments - Restricted for Payment of Current Liability														\$0				
142 Prepaid Expenses and Other Assets	\$174,214		\$201			\$18,675		\$1,364	\$21,827		\$646	\$32,763		\$0	\$27,850	\$277,540		\$277,540
143 Inventories														\$0	\$225,972	\$225,972		\$225,972
143.1 Allowance for Obsolete Inventories	\$0													\$0	\$0	\$0		\$0
144 Inter Program Due From						\$45,331								\$0	\$9,519	\$54,850	-\$54,850	\$0
145 Assets Held for Sale			\$481,620											\$0		\$481,620		\$481,620
150 Total Current Assets	\$8,859,542	\$264,277	\$767,645	\$3,314	\$4,190	\$1,094,502	\$99,127	\$1,535,925	\$1,777,208	\$0	\$77,668	\$2,879,794	\$0	\$233,093	\$1,840,898	\$19,437,183	-\$54,850	\$19,382,333
161 Land	\$9,491,756							\$1,023,640	\$1,926,835			\$4,488,635		\$0		\$16,930,866		\$16,930,866
162 Buildings	\$145,989,729							\$7,129,728	\$10,665,011		\$595,350	\$10,356,516		\$0	\$2,824,630	\$177,560,964		\$177,560,964
163 Furniture, Equipment & Machinery - Dwellings														\$0				
164 Furniture, Equipment & Machinery - Administration	\$827,982					\$147,923		\$232,995	\$7,897					\$0	\$881,658	\$2,096,455		\$2,096,455
165 Leasehold Improvements														\$0				
166 Accumulated Depreciation	-\$87,873,185					-\$147,923		\$2,996,856	-\$2,747,658		-\$125,918	-\$3,207,385		\$0	-\$2,908,450	-\$100,007,375		-\$100,007,375
167 Construction in Progress	\$263,219							\$2,181,953						\$0		\$2,445,172		\$2,445,172
168 Infrastructure														\$0				
160 Total Capital Assets, Net of Accumulated Depreciation	\$68,699,501	\$0	\$0	\$0	\$0	\$0	\$0	\$7,571,460	\$9,852,085	\$0	\$469,432	\$11,637,766	\$0	\$0	\$797,838	\$99,028,082	\$0	\$99,028,082
171 Notes, Loans and Mortgages Receivable - Non-Current									\$41,666	\$0		\$105,000		\$0		\$146,666		\$146,666
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due														\$0				
173 Grants Receivable - Non Current														\$0				
174 Other Assets								\$9,237	\$0			\$0		\$0		\$9,237		\$9,237
176 Investments in Joint Ventures														\$0				
180 Total Non-Current Assets	\$68,699,501	\$0	\$0	\$0	\$0	\$0	\$0	\$7,580,697	\$9,893,751	\$0	\$469,432	\$11,742,766	\$0	\$0	\$797,838	\$99,183,985	\$0	\$99,183,985
200 Deferred Outflow of Resources	\$1,109,382					\$295,084			\$1,614			\$34,612		\$0	\$605,777	\$2,046,469		\$2,046,469
290 Total Assets and Deferred Outflow of Resources	\$78,668,425	\$264,277	\$767,645	\$3,314	\$4,190	\$1,389,586	\$99,127	\$9,116,622	\$11,672,573	\$0	\$547,100	\$14,657,172	\$0	\$233,093	\$3,244,513	\$120,667,637	-\$54,850	\$120,612,787
311 Bank Overdraft														\$0				
312 Accounts Payable <= 90 Days	\$589,977	\$19,269	\$634			\$59,281		\$378,007	\$464,212		\$2,499	\$95,315		\$0	\$199,327	\$1,808,521		\$1,808,521
313 Accounts Payable >90 Days Past Due														\$0				
321 Accrued Wage/Payroll Taxes Payable								\$264	\$14,327					\$0	\$8,211	\$22,802		\$22,802
322 Accrued Compensated Absences - Current Portion	\$216,905					\$53,907			\$909			\$13,718		\$0	\$170,775	\$456,214		\$456,214
324 Accrued Contingency Liability														\$0				
325 Accrued Interest Payable								\$9,211	\$20,371			\$19,250		\$0		\$48,832		\$48,832
331 Accounts Payable - HUD PHA Programs														\$102,610		\$102,610		\$102,610
332 Accounts Payable - PHA Projects														\$0				
333 Accounts Payable - Other Government	\$172,243							\$50,872			\$654	\$172,032		\$0		\$395,801		\$395,801
341 Tenant Security Deposits	\$417,720		\$23					\$29,118	\$81,952		\$2,015	\$96,103		\$0		\$626,931		\$626,931
342 Unearned Revenue	\$116,661		\$8			\$103,063		\$3,799	\$18,914		\$324	\$16,081		\$0	\$8,188	\$267,038		\$267,038
343 Current Portion of Long-term Debt - Capital Projects/Mortgage Revenue	\$100,000							\$67,319	\$329,238		\$23,310	\$718,521		\$0		\$1,238,388		\$1,238,388
344 Current Portion of Long-term Debt - Operating Borrowings														\$0				
345 Other Current Liabilities	\$132,932							\$41,171						\$0		\$174,103		\$174,103
346 Accrued Liabilities - Other	\$412,798					\$5,105		\$266,383						\$0	\$86,357	\$770,643		\$770,643
347 Inter Program - Due To				\$3,314	\$4,190						\$47,346			\$0		\$54,850	-\$54,850	\$0

HOUSING AUTHORITY OF THE CITY OF COLUMBIA (SC002)
COLUMBIA, SC

Entity Wide Balance Sheet Summary

Submission Type: Audited/Single Audit

Fiscal Year End: 06/30/2019

	Project Total	14.267 Continuum of Care Program	14.228 Community Development Block Grants/State's Program	10.559 Summer Food Service Program for Children	14.870 Resident Opportunity and Supportive Services	14.871 Housing Choice Vouchers	14.879 Mainstream Vouchers	6.1 Component Unit - Discretely Presented	6.2 Component Unit - Blended	14.866 Revitalization of Severely Distressed Public Housing	14.241 Housing Opportunities for Persons with AIDS	1 Business Activities	8 Other Federal Program 1	14.866 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	Subtotal	ELIM	Total
348 Loan Liability - Current																		
310 Total Current Liabilities	\$2,159,236	\$19,269	\$665	\$3,314	\$4,190	\$221,356	\$0	\$846,144	\$929,923	\$0	\$76,148	\$1,131,020	\$0	\$102,610	\$472,858	\$5,966,733	-\$54,850	\$5,911,883
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$2,604,167							\$3,173,969	\$7,756,003		\$35,953	\$9,273,375		\$0		\$22,843,467		\$22,843,467
352 Long-term Debt, Net of Current - Operating Borrowings														\$0				
353 Non-current Liabilities - Other	\$108,217					\$116,891								\$0		\$225,108		\$225,108
354 Accrued Compensated Absences - Non Current	\$72,302					\$17,969			\$303			\$4,573		\$0	\$56,925	\$152,072		\$152,072
355 Loan Liability - Non Current														\$0				
356 FASB 5 Liabilities														\$0				
357 Accrued Pension and OPEB Liabilities	\$9,141,003					\$2,430,393			\$19,570			\$291,367		\$0	\$4,981,088	\$16,863,421		\$16,863,421
350 Total Non-Current Liabilities	\$11,925,689	\$0	\$0	\$0	\$0	\$2,565,253	\$0	\$3,173,969	\$7,775,876	\$0	\$35,953	\$9,569,315	\$0	\$0	\$5,038,013	\$40,084,068	\$0	\$40,084,068
300 Total Liabilities	\$14,084,925	\$19,269	\$665	\$3,314	\$4,190	\$2,786,609	\$0	\$4,020,113	\$8,705,799	\$0	\$112,101	\$10,700,335	\$0	\$102,610	\$5,510,871	\$46,050,801	-\$54,850	\$45,995,951
400 Deferred Inflow of Resources	\$738,822					\$196,369			\$4,450			\$18,952		\$0	\$404,468	\$1,363,061		\$1,363,061
508.3 Nonspendable Fund Balance														\$0				
508.4 Net Investment in Capital Assets	\$65,995,334							\$4,330,172	\$1,766,844		\$410,169	\$1,645,870		\$0	\$797,838	\$74,946,227		\$74,946,227
509.3 Restricted Fund Balance														\$0				
510.3 Committed Fund Balance														\$0				
511.3 Assigned Fund Balance														\$0				
511.4 Restricted Net Position		\$245,008	\$766,980			\$0	\$99,127	\$1,185,748				\$116,829		\$0		\$2,413,692		\$2,413,692
512.3 Unassigned Fund Balance														\$0				
512.4 Unrestricted Net Position	-\$2,150,656	\$0	\$0	\$0	\$0	-\$1,593,392	\$0	-\$419,411	\$1,195,480	\$0	\$24,830	\$2,175,186	\$0	\$130,483	-\$3,468,664	-\$4,106,144		-\$4,106,144
513 Total Equity - Net Assets / Position	\$63,844,678	\$245,008	\$766,980	\$0	\$0	-\$1,593,392	\$99,127	\$5,096,509	\$2,962,324	\$0	\$434,999	\$3,937,885	\$0	\$130,483	-\$2,670,826	\$73,253,775	\$0	\$73,253,775
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$78,668,425	\$264,277	\$767,645	\$3,314	\$4,190	\$1,389,586	\$99,127	\$9,116,622	\$11,672,573	\$0	\$547,100	\$14,657,172	\$0	\$233,093	\$3,244,513	\$120,667,637	-\$54,850	\$120,612,787

HOUSING AUTHORITY OF THE CITY OF COLUMBIA (SC002)
COLUMBIA, SC

Entity Wide Revenue and Expense Summary

Submission Type: Audited/Single Audit

Fiscal Year End: 06/30/2019

	Project Total	14.267 Continuum of Care Program	14.228 Community Development Block Grants/State's Program	10.559 Summer Food Service Program for Children	14.870 Resident Opportunity and Supportive Services	14.871 Housing Choice Vouchers	14.879 Mainstream Vouchers	6.1 Component Unit - Discretely Presented	6.2 Component Unit - Blended	14.866 Revitalization of Severely Distressed Public Housing	14.241 Housing Opportunities for Persons with AIDS	1 Business Activities	8 Other Federal Program 1	14.866 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	Subtotal	ELIM	Total
70300 Net Tenant Rental Revenue	\$3,468,237	\$133,796	\$17,555					\$485,966	\$1,891,926		\$10,002	\$2,065,324				\$8,072,806	-\$678,668	\$7,394,138
70400 Tenant Revenue - Other	\$181,592		\$156					\$4,978	\$6,043			\$0		\$0	\$36,000	\$228,769		\$228,769
70500 Total Tenant Revenue	\$3,649,829	\$133,796	\$17,711	\$0	\$0	\$0	\$0	\$490,944	\$1,897,969	\$0	\$10,002	\$2,065,324	\$0	\$0	\$36,000	\$8,301,575	-\$678,668	\$7,622,907
70600 HUD PHA Operating Grants	\$9,807,159	\$591,823			\$186,936	\$26,673,564	\$192,564				\$412,142			\$600,148		\$38,464,336		\$38,464,336
70610 Capital Grants	\$2,332,079													\$0		\$2,332,079		\$2,332,079
70710 Management Fee														\$0	\$2,198,925		-\$2,198,925	\$0
70720 Asset Management Fee														\$0	\$226,200		-\$226,200	\$0
70730 Book Keeping Fee														\$0	\$480,023		-\$480,023	\$0
70740 Front Line Service Fee														\$0				
70750 Other Fees														\$0				
70700 Total Fee Revenue														\$0	\$2,905,148		-\$2,905,148	\$0
70800 Other Government Grants				\$27,356									\$38,503	\$0		\$65,859		\$65,859
71100 Investment Income - Unrestricted	\$118,620								\$8,165			\$48,479		\$0	\$0	\$175,264		\$175,264
71200 Mortgage Interest Income														\$0				
71300 Proceeds from Disposition of Assets Held for Sale									\$1,767,912					\$0		\$1,767,912		\$1,767,912
71310 Cost of Sale of Assets									-\$1,764,075					\$0		-\$1,764,075		-\$1,764,075
71400 Fraud Recovery						\$7,862								\$0		\$7,862		\$7,862
71500 Other Revenue	\$42,655	\$35,967				\$127,606		\$54	\$202,786		\$23,325			\$0	\$34,628	\$467,021		\$467,021
71600 Gain or Loss on Sale of Capital Assets	-\$1,700,421								-\$805,113					\$0		-\$2,505,534		-\$2,505,534
72000 Investment Income - Restricted	\$0													\$0		\$0		\$0
70000 Total Revenue	\$14,249,921	\$761,586	\$17,711	\$27,356	\$186,936	\$26,809,032	\$192,564	\$490,998	\$1,307,644	\$0	\$445,469	\$2,113,803	\$38,503	\$600,148	\$2,975,778	\$50,217,447	-\$3,583,816	\$46,633,631
91100 Administrative Salaries	\$1,152,112	\$203,102				\$834,473		\$35,590	\$119,974		\$28,662	\$65,361		\$25,816	\$1,400,403	\$3,865,493		\$3,865,493
91200 Auditing Fees	\$39,919					\$9,745		\$20,417	\$4,865					\$235		\$75,181		\$75,181
91300 Management Fee	\$1,681,563					\$500,916		\$44,422				\$34,380		\$16,416		\$2,277,697	-\$2,198,925	\$78,772
91310 Book-keeping Fee	\$156,721					\$313,042								\$10,260		\$480,023	-\$480,023	\$0
91400 Advertising and Marketing								\$387						\$0		\$387		\$387
91500 Employee Benefit contributions - Administrative	\$1,078,657	\$80,805				\$455,920		\$3,904	\$21,189		\$11,746	\$49,157		\$8,262	\$799,767	\$2,509,407		\$2,509,407
91600 Office Expenses	\$190,577					\$11,168		\$7,643						\$0		\$327,497		\$327,497
91700 Legal Expense	\$52,430							\$3,381	\$46,265			\$1,009		\$0	\$154,873	\$257,958		\$257,958
91800 Travel						\$575		\$182	\$404					\$0	\$30	\$1,191		\$1,191
91810 Allocated Overhead														\$0				
91900 Other	\$176,724		\$23,145			\$36,038		\$1,485	\$495,643			\$38,936		\$39,238	\$171,497	\$982,706		\$982,706
91000 Total Operating - Administrative	\$4,528,703	\$283,907	\$23,145	\$0	\$0	\$2,161,877	\$0	\$117,411	\$688,340	\$0	\$40,408	\$190,686	\$0	\$100,227	\$2,642,836	\$10,777,540	-\$2,678,948	\$8,098,592
92000 Asset Management Fee	\$226,200							\$5,388						\$0		\$231,588	-\$226,200	\$5,388
92100 Tenant Services - Salaries	\$372,801			\$7,098	\$119,448									\$0		\$499,347		\$499,347
92200 Relocation Costs	\$1,243,240													\$0		\$1,243,240		\$1,243,240
92300 Employee Benefit Contributions - Tenant Services	\$190,068			\$1,774	\$29,862									\$0		\$181,704		\$181,704
92400 Tenant Services - Other	\$67,257			\$18,484	\$37,626			\$478						\$0		\$123,845		\$123,845
92500 Total Tenant Services	\$1,833,366	\$0	\$0	\$27,356	\$186,936	\$0	\$0	\$478	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,048,136	\$0	\$2,048,136
93100 Water	\$691,930							\$2,157	\$125,909		\$2,787	\$155,118		\$0	\$14,441	\$992,342		\$992,342
93200 Electricity	\$694,181		\$680					\$1,103	\$44,693		\$83	\$68,222		\$0	\$88,281	\$897,243		\$897,243
93300 Gas	\$24,988													\$0		\$24,988		\$24,988
93400 Fuel														\$0				
93500 Labor														\$0				
93600 Sewer														\$0				
93700 Employee Benefit Contributions - Utilities									\$10,130					\$0		\$26,465		\$26,465
93800 Other Utilities Expense	\$115,628		\$154											\$0		\$139,144		\$139,144
93000 Total Utilities	\$1,526,727	\$0	\$834	\$0	\$0	\$0	\$0	\$3,260	\$180,732	\$0	\$26,232	\$239,675	\$0	\$0	\$102,722	\$2,080,182	\$0	\$2,080,182
94100 Ordinary Maintenance and Operations - Labor	\$1,184,028													\$0		\$1,260,730		\$1,260,730
94200 Ordinary Maintenance and Operations - Materials and Other	\$779,405		\$2,763			\$4,911			\$5,101		\$1,709	\$199,248		\$0	\$34,211	\$1,027,348		\$1,027,348
94300 Ordinary Maintenance and Operations Contracts	\$2,264,552	\$39,813	\$747			\$36,297		\$103,069	\$554,171		\$12,962	\$428,242		\$0	\$176,064	\$3,615,917		\$3,615,917
94500 Employee Benefit Contributions - Ordinary Maintenance	\$330,526													\$0		\$360,797		\$360,797
94000 Total Maintenance	\$4,558,511	\$39,813	\$3,510	\$0	\$0	\$41,208	\$0	\$103,069	\$559,272	\$0	\$14,671	\$734,463	\$0	\$0	\$210,275	\$6,264,792	\$0	\$6,264,792
95100 Protective Services - Labor	\$550,850													\$0		\$550,850		\$550,850
95200 Protective Services - Other Contract Costs														\$0				
95300 Protective Services - Other	\$348,570								\$5,705					\$0		\$354,275		\$354,275
95500 Employee Benefit Contributions - Protective Services	\$99,288													\$0		\$99,288		\$99,288
95000 Total Protective Services	\$998,708	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,705	\$0	\$0	\$0	\$0	\$0	\$0	\$1,004,413	\$0	\$1,004,413
96110 Property Insurance	\$261,294		\$301			\$2,605		\$32,009	\$77,635		\$1,292	\$61,898		\$0	\$3,883	\$440,917		\$440,917
96120 Liability Insurance	\$24,805					\$4,579								\$0	\$7,632	\$37,016		\$37,016

HOUSING AUTHORITY OF THE CITY OF COLUMBIA (SC002)
COLUMBIA, SC

Entity Wide Revenue and Expense Summary

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Fiscal Year End: 06/30/2019

	Project Total	14.267 Continuum of Care Program	14.228 Community Development Block Grants/State's Program	10.559 Summer Food Service Program for Children	14.870 Resident Opportunity and Supportive Services	14.871 Housing Choice Vouchers	14.879 Mainstream Vouchers	6.1 Component Unit - Discretely Presented	6.2 Component Unit - Blended	14.866 Revitalization of Severely Distressed Public Housing	14.241 Housing Opportunities for Persons with AIDS	1 Business Activities	8 Other Federal Program 1	14.856 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	Subtotal	ELIM	Total
96130 Workmen's Compensation									\$14,473					\$0		\$14,473		\$14,473
96140 All Other Insurance														\$0	\$16,581	\$16,581		\$16,581
96100 Total Insurance Premiums	\$286,099	\$0	\$301	\$0	\$0	\$7,184	\$0	\$32,009	\$92,108	\$0	\$1,292	\$61,898	\$0	\$0	\$28,096	\$508,987	\$0	\$508,987
96200 Other General Expenses	\$281,665	\$9,803				\$40,861			\$116,958		\$1,396	\$635,543		\$0	\$49,862	\$1,136,088		\$1,136,088
96210 Compensated Absences	\$115,250					\$34,093			\$1,213			\$8,477		\$0	\$99,565	\$258,598		\$258,598
96300 Payments in Lieu of Taxes	\$172,243								\$2,500		\$654	\$172,128		\$0		\$347,525		\$347,525
96400 Bad debt - Tenant Rents	\$90,073		\$1,584					\$26,942			\$6	\$99,877		\$0		\$218,482		\$218,482
96500 Bad debt - Mortgages										\$8,618				\$0		\$8,618		\$8,618
96600 Bad debt - Other														\$0				
96800 Severance Expense														\$0				
96000 Total Other General Expenses	\$659,231	\$9,803	\$1,584	\$0	\$0	\$74,954	\$0	\$26,942	\$120,671	\$8,618	\$2,056	\$916,025	\$0	\$0	\$149,427	\$1,969,311	\$0	\$1,969,311
96710 Interest of Mortgage (or Bonds) Payable	\$54,847							\$110,703	\$300,182			\$399,558		\$0		\$865,290		\$865,290
96720 Interest on Notes Payable (Short and Long Term)														\$0				
96730 Amortization of Bond Issue Costs								\$5,340						\$0		\$5,340		\$5,340
96700 Total Interest Expense and Amortization Cost	\$54,847	\$0	\$0	\$0	\$0	\$0	\$0	\$116,043	\$300,182	\$0	\$0	\$399,558	\$0	\$0	\$0	\$870,630	\$0	\$870,630
96900 Total Operating Expenses	\$14,672,392	\$333,523	\$29,374	\$27,356	\$186,936	\$2,285,223	\$0	\$404,600	\$1,947,010	\$8,618	\$84,659	\$2,542,305	\$0	\$100,227	\$3,133,356	\$25,755,579	-\$2,905,148	\$22,850,431
97000 Excess of Operating Revenue over Operating Expenses	-\$422,471	\$428,063	-\$11,663	\$0	\$0	\$24,523,809	\$192,564	\$86,398	-\$639,366	-\$8,618	\$360,810	-\$428,502	\$38,503	\$499,921	-\$157,590	\$24,461,868	-\$678,668	\$23,783,200
97100 Extraordinary Maintenance														\$0				
97200 Casualty Losses - Non-capitalized	\$27,830													\$0	-\$500	\$27,330		\$27,330
97300 Housing Assistance Payments		\$436,523				\$24,784,238	\$93,437				\$321,268			\$499,921		\$26,135,387	-\$678,668	\$25,456,719
97350 HAP Portability-In														\$0				
97400 Depreciation Expense	\$5,569,682							\$217,097	\$297,051		\$21,649	\$375,027		\$0	\$33,909	\$6,514,415		\$6,514,415
97500 Fraud Losses														\$0				
97600 Capital Outlays - Governmental Funds														\$0				
97700 Debt Principal Payment - Governmental Funds														\$0				
97800 Dwelling Units Rent Expense														\$0				
90000 Total Expenses	\$20,269,904	\$770,046	\$29,374	\$27,356	\$186,936	\$27,069,461	\$93,437	\$621,697	\$2,244,061	\$8,618	\$427,576	\$2,917,332	\$0	\$600,148	\$3,166,765	\$58,432,711	-\$3,583,816	\$54,848,895
10010 Operating Transfer In	\$687,462								\$115,078					\$0		\$802,540	-\$802,540	\$0
10020 Operating Transfer Out	-\$687,462											-\$115,078		\$0		-\$802,540	\$802,540	\$0
10030 Operating Transfers from/to Primary Government														\$0				
10040 Operating Transfers from/to Component Unit								\$1,107,906						\$0		\$1,107,906		\$1,107,906
10050 Proceeds from Notes, Loans and Bonds														\$0				
10060 Proceeds from Property Sales														\$0				
10070 Extraordinary Items, Net Gain/Loss														\$0				
10080 Special Items (Net Gain/Loss)														\$0				
10091 Inter Project Excess Cash Transfer In	\$600,000													\$0		\$600,000	-\$600,000	\$0
10092 Inter Project Excess Cash Transfer Out	-\$600,000													\$0		-\$600,000	\$600,000	\$0
10093 Transfers between Program and Project - In	\$38,503													\$0		\$38,503	-\$38,503	\$0
10094 Transfers between Project and Program - Out													-\$38,503	\$0		-\$38,503	\$38,503	\$0
10100 Total Other financing Sources (Uses)	\$38,503	\$0	\$0	\$0	\$0	\$0	\$0	\$1,107,906	\$115,078	\$0	\$0	-\$115,078	-\$38,503	\$0	\$0	\$1,107,906	\$0	\$1,107,906
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	-\$5,981,480	\$8,460	-\$11,663	\$0	\$0	\$260,429	\$99,127	\$977,207	-\$821,339	-\$8,618	\$17,893	-\$918,607	\$0	\$0	-\$190,969	-\$7,107,358	\$0	-\$7,107,358
11020 Required Annual Debt Principal Payments	\$90,001	\$0	\$0	\$0	\$0	\$0	\$0	\$128,999	\$1,606,823	\$0	\$23,310	\$436,699	\$0	\$0	\$0	\$2,285,832	\$0	\$2,285,832
11030 Beginning Equity	\$69,826,158	\$253,468	\$778,643	\$0	\$0	-\$1,332,963	\$0	\$0	\$3,783,663	\$74,822	\$417,106	\$4,790,288	\$0	\$130,483	-\$2,479,837	\$76,241,831		\$76,241,831
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$0			\$0				\$4,119,302		-\$66,204		\$66,204		\$0		\$4,119,302		\$4,119,302
11050 Changes in Compensated Absence Balance														\$0				
11060 Changes in Contingent Liability Balance														\$0				
11070 Changes in Unrecognized Pension Transition Liability														\$0				
11080 Changes in Special Term/Severance Benefits Liability														\$0				
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents														\$0				
11100 Changes in Allowance for Doubtful Accounts - Other														\$0				
11170 Administrative Fee Equity						-\$1,593,392								\$0		-\$1,593,392		-\$1,593,392
11180 Housing Assistance Payments Equity						\$0								\$0		\$0		\$0
11190 Unit Months Available	26196	726	36			43577	240	852	2820		912	3912		1368		80639		80639
11210 Number of Unit Months Leased	25459	668	36			41900	185	835	2679		893	3716		1362		77733		77733
11270 Excess Cash	\$5,102,501													\$0		\$5,102,501		\$5,102,501
11610 Land Purchases	\$0													\$0	\$0	\$0		\$0
11620 Building Purchases	\$2,332,079													\$0	\$0	\$2,332,079		\$2,332,079
11630 Furniture & Equipment - Dwelling Purchases	\$0													\$0	\$0	\$0		\$0
11640 Furniture & Equipment - Administrative Purchases	\$0													\$0	\$0	\$0		\$0
11650 Leasehold Improvements Purchases	\$0													\$0	\$0	\$0		\$0

HOUSING AUTHORITY OF THE CITY OF COLUMBIA (SC002)
COLUMBIA, SC

Entity Wide Revenue and Expense Summary

Submission Type: Audited/Single Audit

Fiscal Year End: 06/30/2019

	Project Total	14.267 Continuum of Care Program	14.228 Community Development Block Grants/State's Program	10.559 Summer Food Service Program for Children	14.870 Resident Opportunity and Supportive Services	14.871 Housing Choice Vouchers	14.879 Mainstream Vouchers	6.1 Component Unit - Discretely Presented	6.2 Component Unit - Blended	14.866 Revitalization of Severely Distressed Public Housing	14.241 Housing Opportunities for Persons with AIDS	1 Business Activities	8 Other Federal Program 1	14.856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	Subtotal	ELIM	Total
11660 Infrastructure Purchases	\$0														\$0	\$0		\$0
13510 CFFP Debt Service Payments	\$0														\$0	\$0		\$0
13901 Replacement Housing Factor Funds	\$0														\$0	\$0		\$0

	Task Hours	Labor Rate	Labor Cost	Material Cost	RESIDENT CHARGE
ELECTRICAL REPLACEMENT PARTS:					
Covers - Light Fixtures Bedroom	0.25	\$22.00	\$5.50	5.08	\$10.58
Covers - Ceiling Fan	0.25	\$22.00	\$5.50	8.28	\$13.78
Smoke Detector - Battery	0.25	\$22.00	\$5.50	5.34	\$10.84
Smoke Detector - Electric	0.25	\$22.00	\$5.50	10.84	\$16.34
Light Fixture - pull chain	0.5	\$22.00	\$11.00	1.49	\$12.49
Meter Covers - electric	0.25	\$22.00	\$5.50	6.88	\$12.38
Florescent Lamp	0.25	\$22.00	\$5.50	1.76	\$7.26
Thermostat - Wall heating and cooling	0.75	\$22.00	\$16.50	24.23	\$40.73
Thermostat- wall heaters	0.75	\$22.00	\$16.50	19.10	\$35.60
Exhaust fans - bath and ceiling	1	\$22.00	\$22.00	11.57	\$33.57
Light Fixture - living room and bedroom	0.75	\$22.00	\$16.50	7.32	\$23.82
Light Fixture - Kitchen	0.75	\$22.00	\$16.50	14.91	\$31.41
Light Fixture - Porch	0.5	\$22.00	\$11.00	13.48	\$24.48
Electric Meter	0.5	\$22.00	\$11.00	33.55	\$44.55
Range hood exhaust cover	0.5	\$22.00	\$11.00	17.97	\$28.97
Attic Fan Cover	0.5	\$22.00	\$11.00	0.00	\$11.00
Installation of 220 volt circuit for window air conditioner (breaker switch & outlet)					
	0.75	\$22.00	\$16.50	14.56	\$31.06
			\$0.00	0.00	\$0.00
ELECTRIC RANGE PARTS			\$0.00	0.00	\$0.00
Drip Pan - Large	0.25	\$22.00	\$5.50	1.18	\$6.68
Drip Pan - Ring small	0.25	\$22.00	\$5.50	1.23	\$6.73
Drip Pan - Ring large	0.25	\$22.00	\$5.50	1.38	\$6.88
Top Surface Element - small	0.25	\$22.00	\$5.50	16.38	\$21.88
Top Surface Element - large	0.25	\$22.00	\$5.50	18.93	\$24.43
Oven Control	0.5	\$22.00	\$11.00	51.82	\$62.82
Baking Element	0.25	\$22.00	\$5.50	16.87	\$22.37
Broil Element	0.25	\$22.00	\$5.50	18.84	\$24.34
Knob - Burner	0.25	\$22.00	\$5.50	5.60	\$11.10
Knob - Oven Control	0.25	\$22.00	\$5.50	5.60	\$11.10
Light - Indicator	0.25	\$22.00	\$5.50	2.20	\$7.70
Oven Racks	0.25	\$22.00	\$5.50	23.38	\$28.88
Broiler Pan	0.25	\$22.00	\$5.50	10.48	\$15.98
Surface Unit Switch	0.5	\$22.00	\$11.00	27.14	\$38.14
Oven Handle	0.5	\$22.00	\$11.00	11.00	\$22.00
Over Door Seal	0.25	\$22.00	\$5.50	21.34	\$26.84
Range Hood- Replacement	1	\$22.00	\$22.00	42.63	\$64.63
Fan Switch - range hood	0.5	\$22.00	\$11.00	2.07	\$13.07
Light Switch - Range Hood	0.25	\$22.00	\$5.50	2.07	\$7.57

Filter - Charcoal	0.25	\$22.00	\$5.50	6.48	\$11.98
Grease Filter - metal	0.25	\$22.00	\$5.50	3.58	\$9.08
Range hood - Light	0.25	\$22.00	\$5.50	1.97	\$7.47
Exhaust Fan	0.5	\$22.00	\$11.00	9.08	\$20.08
			\$0.00	0.00	\$0.00
ELECTRIC WALL HEATER REPLACEMENT			\$0.00	0.00	\$0.00
Thermostat Switch	0.5	\$22.00	\$11.00	22.81	\$33.81
			\$0.00		\$0.00
GAS			\$0.00	0.00	\$0.00
Meter Replacememt	0.5	\$22.00	\$11.00	59.40	\$70.40
Meter cover	0.5	\$22.00	\$11.00	6.88	\$17.88
Wall Furnace Replacement	2	\$22.00	\$44.00	319.51	\$363.51
			\$0.00	0.00	\$0.00
WATER HEATER			\$0.00	0.00	\$0.00
Electric	2.5	\$22.00	\$55.00	275.00	\$330.00
Tankless	2	\$22.00	\$44.00	245.30	\$289.30
Gas 40 Gallon	2.5	\$22.00	\$55.00	275.00	\$330.00
			\$0.00		\$0.00
GAS RANGE PARTS			\$0.00		\$0.00
Broiler Rack	0.25	\$22.00	\$5.50	23.38	\$28.88
Burner Grates	0.25	\$22.00	\$5.50	12.51	\$18.01
Burner Caps	0.25	\$22.00	\$5.50	10.99	\$16.49
Burner Knobs	0.25	\$22.00	\$5.50	2.29	\$7.79
Oven Burner Pilot	0.25	\$22.00	\$5.50	21.74	\$27.24
Oven Rack	0.25	\$22.00	\$5.50	23.38	\$28.88
Oven Thermostate	0.5	\$22.00	\$11.00	108.70	\$119.70
Oven Control Valve	0.5	\$22.00	\$11.00	41.80	\$52.80
Oven Door Handle	0.5	\$22.00	\$11.00	11.11	\$22.11
Over Door Seal	0.5	\$22.00	\$11.00	21.34	\$32.34
			\$0.00		\$0.00
REFRIGERATOR			\$0.00		\$0.00
Vegetable Drawer Cover	0.25	\$22.00	\$5.50	9.90	\$15.40
Vegetable Drawer	0.25	\$22.00	\$5.50	22.48	\$27.98
Freezer Door Handle	0.25	\$22.00	\$5.50	24.23	\$29.73
Refrigerator Door Handle	0.5	\$22.00	\$11.00	24.23	\$35.23
Bars for Doors	0.25	\$22.00	\$5.50	7.63	\$13.13
Bar Brackets	0.25	\$22.00	\$5.50	4.86	\$10.36
Interior light switch	0.25	\$22.00	\$5.50	5.94	\$11.44
Interiot light shield	0.25	\$22.00	\$5.50	2.20	\$7.70
Thermostat Control	0.5	\$22.00	\$11.00	6.86	\$17.86
Door Panel	1	\$22.00	\$22.00	0.00	\$22.00
Freezer Door Panel	1	\$22.00	\$22.00	0.00	\$22.00
Freezer Door	1	\$22.00	\$22.00	0.00	\$22.00
Freezer Gasket	0.75	\$22.00	\$16.50	22.74	\$39.24
Refrigerator Door Gasket	0.75	\$22.00	\$16.50	22.24	\$38.74
Shelf	0.25	\$22.00	\$5.50	6.07	\$11.57
Timer	0.5	\$22.00	\$11.00	8.14	\$19.14

Dial - Cold Control	0.5	\$22.00	\$11.00	23.94	\$34.94
Wire Rack	0.25	\$22.00	\$5.50	33.17	\$38.67
			\$0.00		\$0.00
REPLACEMENT OF PLUMBING PARTS			\$0.00		\$0.00
Shower Head	0.25	\$22.00	\$5.50	4.19	\$9.69
Crump Cup Strainer	0.25	\$22.00	\$5.50	2.20	\$7.70
Faucet Aerator	0.25	\$22.00	\$5.50	2.20	\$7.70
Faucet Stem	0.25	\$22.00	\$5.50	5.50	\$11.00
Faucet Handle	0.25	\$22.00	\$5.50	6.33	\$11.83
Commode Handle	0.25	\$22.00	\$5.50	2.20	\$7.70
Kit. Sink Trap	0.5	\$22.00	\$11.00	1.10	\$12.10
Lavatory Trap	0.5	\$22.00	\$11.00	1.10	\$12.10
Commode Bowl	1	\$22.00	\$22.00	59.16	\$81.16
Commode Tank	1	\$22.00	\$22.00	49.50	\$71.50
Combination Tank and Bowl	1	\$22.00	\$22.00	108.57	\$130.57
Commode Tank Top	0.25	\$22.00	\$5.50	9.41	\$14.91
Commode Seat	0.25	\$22.00	\$5.50	6.12	\$11.62
Faucet	1	\$22.00	\$22.00	47.30	\$69.30
Toilet Tissue Holder	0.25	\$22.00	\$5.50	2.05	\$7.55
Towel Bar	1	\$22.00	\$22.00	3.19	\$25.19
Towel Bar Brackets	0.25	\$22.00	\$5.50	2.84	\$8.34
Garbage Disposal	1	\$22.00	\$22.00	52.80	\$74.80
Kit Sink Hose	0.5	\$22.00	\$11.00	1.85	\$12.85
Spray Hose	0.5	\$22.00	\$11.00	3.42	\$14.42
Spray Hose Head	0.5	\$22.00	\$11.00	4.94	\$15.94
Kit Sink Stopper	0.25	\$22.00	\$5.50	0.58	\$6.08
Lavatory Sink Stopper	0.25	\$22.00	\$5.50	0.57	\$6.07
			\$0.00		\$0.00
PLUMBING SERVICES			\$0.00		\$0.00
Unstop with Plunger	1	\$22.00	\$22.00	0.00	\$22.00
Unstop with Drain Cleaner	0.5	\$22.00	\$11.00	6.88	\$17.88
Pull up Commode to Unstop	2	\$22.00	\$44.00	3.30	\$47.30
Unstop Washing Machine Drain Line	1	\$22.00	\$22.00	0.00	\$22.00
Garbage Disposal	1	\$22.00	\$22.00	67.65	\$89.65
Remove Garbage Disposal to Unstop	1	\$22.00	\$22.00	0.00	\$22.00
			\$0.00		\$0.00
CARPENTRY REPAIRS			\$0.00		\$0.00
Replace Metal Screen Door	2	\$22.00	\$44.00	213.87	\$257.87
Molding - per section	0.25	\$22.00	\$5.50	11.00	\$16.50
Rescreen Door	1	\$22.00	\$22.00	2.83	\$24.83
Door Closure	0.5	\$22.00	\$11.00	7.04	\$18.04
Screen Door Lock	0.25	\$22.00	\$5.50	8.53	\$14.03
Screen Door Latch Assembly	0.25	\$22.00	\$5.50	6.46	\$11.96
Storm Window	2	\$22.00	\$44.00	44.00	\$88.00
Door Sweep	0.25	\$22.00	\$5.50	2.16	\$7.66
Rehang Door	1.5	\$22.00	\$33.00		\$33.00
			\$0.00		\$0.00

INTERIOR KNOB SET	2	\$22.00	\$44.00	95.70	\$139.70
Deadbolt	1	\$22.00	\$22.00	12.38	\$34.38
Lock Change	1	\$22.00	\$22.00	9.34	\$31.34
Closet Locks	0.5	\$22.00	\$11.00	4.63	\$15.63
Lock Cylinders	0.5	\$22.00	\$11.00	23.10	\$34.10
Latchbolts	0.5	\$22.00	\$11.00	4.24	\$15.24
Thumb Turn Locks	0.5	\$22.00	\$11.00	13.04	\$24.04
Exterior Knob Set	0.5	\$22.00	\$11.00	11.99	\$22.99
Interior Knob Set	0.5	\$22.00	\$11.00	7.59	\$18.59
			\$0.00		\$0.00
WINDOW/WOOD REPLACEMENT			\$0.00		\$0.00
Window Replacement	2.5	\$22.00	\$55.00		\$55.00
Top Sash	1.5	\$22.00	\$33.00		\$33.00
Bottom Sash	1.5	\$22.00	\$33.00		\$33.00
Window Sills	1	\$22.00	\$22.00		\$22.00
			\$0.00		\$0.00
STORM WINDOW REPLACEMENT			\$0.00		\$0.00
Full Storm Window Replacement	2.5	\$22.00	\$55.00	40.82	\$95.82
Storm Window Pane	1	\$22.00	\$22.00	10.90	\$32.90
Window Screen	1	\$22.00	\$22.00	5.17	\$27.17
Rehang Storm Window	1	\$22.00	\$22.00	0.00	\$22.00
Full Window Rescreen	1.5	\$22.00	\$33.00	5.17	\$38.17
Half Window Rescreen	0.75	\$22.00	\$16.50	2.02	\$18.52
			\$0.00		\$0.00
WINDOW PANE REPLACEMENT	1.5	\$22.00	\$33.00		\$33.00
SC 2-1 Thermo Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC 2-2 Thermo Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC 2-9 Thermo Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC2-11 Thermo Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC 2-14 Termon Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC 2-16 Thermo Pane	1.5	\$22.00	\$33.00	0.00	\$33.00
SC 2-19 Thermo pane	1.5	\$22.00	\$33.00	0.00	\$33.00
			\$0.00		\$0.00
DOOR PANE REPLACEMENT		\$22.00	\$0.00	0.00	\$0.00
SC 2-9	1.5	\$22.00	\$33.00	0.00	\$33.00
			\$0.00		\$0.00
CABINET REPLACEMENT			\$0.00		\$0.00
Medicine Cabinet	1	\$22.00	\$22.00	29.70	\$51.70
Kitchen cabinet door	1.5	\$22.00	\$33.00	11.00	\$44.00
Kitchen door glide (metal)	0.5	\$22.00	\$11.00	2.95	\$13.95
Kitchen door glide (plastic)	0.5	\$22.00	\$11.00	0.29	\$11.29
Kitchen cabinet repairs	1	\$22.00	\$22.00	0.00	\$22.00
			\$0.00		\$0.00
COUNTER TOP REPLACEMENT			\$0.00		\$0.00
All counter tops (Labor plus Material)		\$22.00	\$0.00		\$0.00
			\$0.00		\$0.00
REPLACEMENT OF MISC PARTS			\$0.00		\$0.00

Closet Rod	0.25	\$22.00	\$5.50	3.25	\$8.75
Traverse Rod 120"	0.25	\$22.00	\$5.50	16.83	\$22.33
Traverse Rod 96"	0.25	\$22.00	\$5.50	13.66	\$19.16
Traverse Rod 48"	0.25	\$22.00	\$5.50	6.80	\$12.30
Shower Curtain Rod	0.25	\$22.00	\$5.50	2.20	\$7.70
Mailbox	0.25	\$22.00	\$5.50	10.47	\$15.97
Vinyl Covebase 4ft section	0.5	\$22.00	\$11.00	1.66	\$12.66
Vinyl or Ceramic Flooring		\$22.00	\$0.00	0.00	\$0.00
Handrails and Brackets	1	\$22.00	\$22.00	0.00	\$22.00
Foundation Vents	1	\$22.00	\$22.00	0.00	\$22.00
Fire Extinguisher	0.25	\$22.00	\$5.50	29.65	\$35.15

PAINTING

Painting and Drywall Repairs (labor
plus Materials) \$22.00

SPECIAL CLEANING

Refrigerators \$44.00

Stove \$44.00

Trash Removal \$12.00 per bag

Furniture Removal

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

RESOLUTION 2019-674: Approval of the Housing Authority of City of Columbia, SC Maintenance Plan

BACKGROUND

Established on the 10th day of April 1934, the Housing Authority of the City of Columbia, South Carolina's mission is to provide safe, decent housing for nearly 6,500 low-income households through the successful administration of the Public Housing, Housing Choice Voucher (formerly known as Section 8), Low Income Housing Tax Credits, Continuum of Care, and Homeownership programs.

The Purpose of the Maintenance Plan Policy is to facilitate Columbia Housing's responsibility for managing its maintenance functions in the most cost-effective manner possible, while maximizing the useful life of CH's Real Estate Portfolio and providing the best service to the residents. The following policy statements are designed to establish the structure of an effective and efficient maintenance system based on the following basic principles:

- Respond to Resident generated service requests within three (3) days;
- Respond to emergency service requests IMMEDIATELY;
- Respond to urgent service requests on the same day as received and within a 24-hour maximum;
- Adhere to documented Preventative Maintenance Program;
- Inspect all units for Preventive Maintenance annually;
- Complete all scheduled Preventive Maintenance inspections within 12 months; (*Fiscal year begins July 1st and ends June 30th*)
- Adopt and adhere to a cyclical painting program; and
- Prepare vacant units for occupancy within five (5) working days.

The Maintenance Plan was presented to the Housing Authority of the City of Columbia's Human Services Committee for review on Thursday, December 12, 2019.

RESOLUTION

WHEREAS, the Housing Authority of the City of Columbia, SC Board of Commissioners hereby approves the Maintenance Plan; and

NOW THEREFORE BE IT FURTHER RESOLVED, by the Board of Commissioners of the Housing Authority of the City of Columbia, SC, that the Maintenance Plan presented as an attachment to this Resolution be approved on this 19th day of December 2019.

**BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC**

BY: _____


Ernest W. Cromartie, III, Chairman

MAINTENANCE PLAN

Columbia Housing is responsible for managing the maintenance functions in the most cost-effective manner possible while maximizing the useful life of CH's Real Estate Portfolio and providing the best service to the residents. The following policy statements are designed to establish the structure of an effective and efficient maintenance system.



Resolution 2019-674

Maintenance Plan Policy

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GENERAL PERFORMANCE STANDARDS

- Respond to Resident generated service requests within three (3) days maximum;
- Respond to emergency service requests IMMEDIATELY;
- Respond to Urgent service requests on the same day as received within a 24 hour Maximum;
- Adhere to a documented Preventive Maintenance Program;
- Inspect all units for Preventive Maintenance annually;
- Complete all scheduled Preventive Maintenance inspections within 12 months; (Fiscal year begins July 1st and ends June 30th);
- Adopt and adhere to a cyclical painting program;
- Prepare vacant units for occupancy (5 working days maximum; 3 days for painting and cleaning & 2 days for maintenance repairs);
- Provide Maintenance Staff with access to all necessary tools, equipment, supplies, and materials; and
- Assure that Privacy of Residents and CHA issues are not with outside entities, only on a need to know basis, i.e. Contractors performing work etc.

B MAINTENANCE PRIORITIES

1. Emergency
2. Urgent
3. Routine
4. Preventative Maintenance
5. Special Projects

Maintenance work shall be performed according to the following priority of work order categories: Special Projects or the PM program could be assigned before routine by manager or Senior Staff.

1. **Emergency**—These are situations that if not repaired immediately could cause injury, loss of life, threaten health or cause serious property damage. These include but are not limited to:
 - a. Broken gas line or leak
 - b. Fires

- c. Fire panel or sprinkler system not operational
- d. Flooding (natural or broken pipes)
- e. Smoke Detector or CO detector alarming
- f. Major roof leaks
- g. Weather Emergencies
- h. Lock outs
- i. AC if outside temp is 80 or higher, or if there is a reasonable accommodation that requires AC
- j. Toilet or tub stoppage where there is only one bathroom
- k. Heat if outside temp is 55 or below, or if there is a reasonable accommodation that requires Heat
- l. No working elevators
- m. Security issues where doors or windows on the 1st or 2nd floor will not lock
- n. Loss of power in the entire unit (if not a utility company issue)
- o. No water in the entire apartment
- p. Exposed electrical lines
- q. Rodent/wildlife inside of a unit
- r. Any other situation that may cause injury or threat to person or property

NOTES:

- *Emergency work orders receive top priority from Columbia housing maintenance staff and are completed or abated immediately.*
- *In cases of fire, the resident must call 911 before contacting Columbia Housing.*
- *All emergency requests after hours will be received by Columbia Housing's after hours call center and abated or repaired within 24 hours.*
- *A trip charge may be applied if the technician responds to a non-emergency*

- 2. **Urgent**—These are situations that pose a threat to residents or property if left unattended, but are not life threatening
 - a. Appliances not working including range, refrigerator and water heater
 - b. Partial electrical outage
 - c. Partial water outage
 - d. Minor roof leaks
 - e. Blocked right away preventing passage of emergency vehicles

- f. Second (2nd) elevator not operational
- g. Entry doors at high-rise buildings are not operational
- h. Drain stoppages
- i. Smoke or CO detector replacement

NOTES:

- *Urgent work orders are lower level emergencies that are worked into the maintenance staff's daily schedule.*
- *All urgent maintenance requests will be addressed no later than the next day including holidays and weekends.*
- *All urgent requests after hours will be received by Columbia Housing's after hours call center and abated or repaired within 24 hours.*

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. Routine maintenance requests may include but are not limited to the following:
 - a. Plumbing repairs
 - b. Electrical repairs
 - c. Appliance repairs
 - d. Carpentry repairs

NOTES:

- *Routine service requests will be completed within three (3) working days*
- *Routine service requests should be called in during normal business hours only.*

4. **Preventative 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 property in good repair and to extend its useful life by ensuring repairs are made prior to deterioration and actual breakdown, thereby minimizing both damage and repair costs.

5. **Special Projects**—Any type of service request that may require

planning or the purchase of special materials or additional workforce. Special projects may include but are not limited to the following:

- a. Wheelchair ramps
- b. Sidewalk repair
- c. Fences
- d. Gutter cleaning, etc.

NOTES:

- *Depending on the nature and need of the project, the priority could be moved up.*

C WORK ORDER SYSTEM

1. Policies

- Maintenance technicians will make no repairs without a work order. This serves as the right to enter a unit and to perform the work, except on an emergency basis where no work order is available. One will be generated as soon as possible.
- Repairs are to be completed within the time frames established in the General Performance Standards (see section A).
- Maintenance technicians will leave a notice of entry if the resident is not at home.
- 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) Charges to the resident if applicable

2. Generalities of Work Orders

- Most work order requests initiated by the housing authority staff will be those attributable to preventative, or planned maintenance or unit inspections. These work orders are classified as routine work orders.
- Maintenance staff will routinely perform work during their regularly assigned shift, except for approved breaks, lunches or management called meetings.
- Maintenance staff will not leave their assigned area without first notifying the immediate supervisor or designee.

- Maintenance staff will be provided parts and supplies needed to complete assigned work orders.
- Maintenance staff will make note, while in a unit or on site, of excessive poor housekeeping habits, children left unattended, excessive damages/repeated damages, infestation, any illegal activity, or other lease violations. These will be noted on the work order and management notified immediately.
- A work order deferred for modernization is any work order that is combined with similar work items and completed within the current fiscal 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.
- Residents will be charged for any resident caused damage or neglect. The charges will be in accordance with the resident charge list that calculates both the average cost of the part and the average wage cost to make the repair.
- A work order quality control system will be used to ensure that work orders are being completed timely, accurately, and professionally. We may use work order reports, call residents to verify that work was completed or conduct a physical inspection.
- All maintenance technicians will wear personal protected equipment as necessary.
- All maintenance workers will obey all safety rules and precautions.

D CONTRACTED SERVICES

Contracted services will be used for services requiring license or expertise beyond normal staff capacity. These may include but are not limited to:

1. Extermination
2. Janitorial and Grounds Cleaning
3. Trash Collection
4. Landscaping
5. Painting
6. Flooring

E VACANT UNITS

Vacant Unit Turns include all work necessary to prepare a vacant unit for new occupancy. All vacant unit turns will be completed within five (5) days, in accordance with HUD and housing authority requirements.

Preventive Maintenance is part of the planned or scheduled maintenance program for the housing authority. It's designed to increase the longevity and reduce repair costs. See attached Preventative Maintenance Schedule. Categories include but are not limited to the following:

1. Annual Unit Inspections:

Annual Inspections will be held in accordance with HUD requirements for an Annual UPCS inspection on every unit, A REAC or ENSPIRE inspection to be determined by HUD , 4 mini, inspections, at the time of filter change and, 2 customer service visits to be performed by a member of management.

2. Buildings and Systems Maintenance

- **Buildings:** Will be inspected according to the PM schedule
 - The complete building envelope, consisting of roofs, overhangs, exterior walls, windows, screens, doors, railing, and infestation
 - The maintenance technicians will report the conditions found and indicate the exact location of needed repairs or replacements.
- **HVAC Systems:** Regular inspections will be made of HVAC systems whether by Housing Authority personnel or contractors.
- **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 part, is placed in the file to establish a record of all work performed on the equipment or system.
- **Painting**
 - i. 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.

ii. 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.

- **General Procedures:** Work to be accomplished quarterly is confirmed by work orders produced on the first of March, June, September, and December.

3. Exterior and Public Areas

- All grounds, playground equipment, picnic tables, public or private streets or driveways roads, walks, and the drainage system and lawns (checking for foundation problems, gas or water leaks, and other needed repairs).
- Particular attention will be given to evidence of sewer problems, water leaks, gas leaks, and the electrical drops, and gas meter installations.

ATTACHMENT

**PREVENTATIVE
MAINTENANCE
SCHEDULE**

PREVENTIVE MAINTENANCE SCHEDULE												
ACTION	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
WEEKLY												
Maintenance Shops Inspected												
Trash Chutes cleaned & Sanitized												
MONTHLY												
Night Exterior Lighting												
Landscaping & Grounds, Parking Lots												
Fencing & Railing												
Common Areas												
Curbs & Driveways												
Security Cameras/ Alarm System												
Playgrounds Equip/ Handrails												
Signage, Mailboxes												
Fire Pumps at Highrises												
QUARTERLY												
Common Area Flooring	X			X			X			X		
Dumpster Pads Pressure Washed	X			X			X			X		
Elevators		X			X			X			X	
Vehicles (Oil, Tires, Wipers, etc)		X			X			X			X	
Sidewalk Trip Hazards			X						X			X
Domestic Hot Water			X			X			X			X
Domestic Water Pump Greased			X			X			X			X
Smoke Detectors/CO2 Detectors	X			X			X			X		
Change HVAC Filters	X			X			X			X		
Plumbing, Vertical and Horizontal Drains	X			X			X			X		
BI-ANNUAL												
Back-up Generators				X						X		
Roofs, Gutters, Downspouts/Fascia/Soffit	X						X					
Siding				X						X		
Balconies					X						X	
Tools & Equipment			X						X			

Operations and Management

PHAS Score

The PHAS Score is 86.

SEMAP Results

The SEMAP score is 78.

Results of Resident Satisfaction Survey

Not applicable

Subcomponent A: Management Structure of the Organization

The organizational structure is comprised of three tiers of leadership.

Executive Director – Ivory Mathews is the Chief Executive Officer of the Housing Authority of the City of Columbia, SC. She reports directly to a 7-member Board of Commissions. Under her leadership, Yvonda Bean serves as the Chief Operations Officer. The Executive Assistants and specialty consultants provide administrative and operational support and guidance to the leadership team. The CEO's senior leadership team is comprised of 4 Senior Vice-Presidents:

- SVP of Operations/COO,
- SVP of Real Estate & Development
- SVP of Communications
- CFO

Each SVP is responsible for a single division or several operational divisions within the agency.

SVP of Operations/COO

The SVP of Operations/COO is responsible for most of the operational areas within the Authority. The COO has several divisions that are under her leadership.

- Executive Assistant – provides executive administrative support to the COO.
- VP of Human Resources – Manages all human resources operations and personnel development strategies. Additional Support staff is the human resources analyst.
- VP of Strategic Initiatives – Oversees operations of special programming and activities to include Continuum of Care, HCV Homeownership, Strategic Planning, and Grant Writing. The S.I. team consists of a homeownership coordinator, CoC Coordinator, CoC Case Managers, and an administrative clerk.

- VP of Resident and Family Services – Manages all economic and supportive services programs for residents to include Family Self-Sufficiency and ROSS Grants, senior programs, Resident Executive Councils and specialized health and wellness activities. The Resident and Family Services team consists of an assistant, FSS Coordinator, Resident Services Coordinator, ROSS Coordinator, and a driver.
- VP of Housing Choice Voucher – oversees all operations of the HCV, inspections and PBV Programs. The VP of HCV team consists of a program support team leader, transaction team leader, customer service specialists, landlord liaison, housing specialists for special programs, contract specialists, transaction clerks and inspections.
- Community Safety Manager – Supervises and manages all security and crime enforcement activities for public housing developments. The CSM has community safety liaisons to provide additional support for the security department.
- Superintendent of Maintenance – Oversees central office and contracted maintenance services. Positions under the leadership of the Superintendent are maintenance lead, transportation coordinator, inventory specialists, work order specialists, maintenance technician, maintenance assistance and custodian laborers.
- Regional Property Managers manages all operations of the public housing portfolio. Their teams consist of community managers and property specialists.
- Manager of Information Technology – Oversees all operations related to IT. An IT Specialists is under the supervision of the manager.

CFO

- Oversees fiscal operations and financial management of the Authority. The fiscal management teams consist of a controller, accounting analysts, and accounting specialists.

SVP of Real Estate & Development

- Oversees development, capital improvement, procurement, and contract administration for the Authority. The team under the leadership of the SVP of Development is comprised of a capital asset manager, development asset manager, procurement analysts, contract specialists, and procurement specialists.

SVP Communications – Oversees internal and external communications and provide public relations consulting services for leadership team.

Each division is comprised of employees working in specific operational areas to support the mission of Columbia Housing and administer programs to support

Subcomponent B: Programs Operated by Columbia Housing

1. Public Housing
2. Housing Choice Voucher
3. VASH
4. Mainstream
5. HCV Homeownership
6. Continuum of Care
7. HOPWA
8. Mod Rehab

Subcomponent C: Internal Policy Documents that Government Maintenance and Management of Public Housing are included in the listed attachments.

1. Operations and Maintenance Policy (Exhibit I)
2. ACOP (Exhibit C)
3. Flat Rent Policy (Exhibit J)
4. Work Order Charge Policy (Exhibit K)
5. Bedbug Addendum (Exhibit H)
6. Admin Plan (Exhibit B)
7. Community Service and Self Sufficiency (Exhibit L)
8. FSS Action Plan (Exhibit M)

RENT DETERMINATION

The Columbia Housing Authority operates both Public Housing and Housing Choice Voucher Programs. The CHA Board of Commissioners has approved the following rent policies for the Public Housing Program.

PUBLIC HOUSING

1. The CHA continues to calculate rent payment at the greater of 30% adjusted monthly income or 10% of monthly income.
2. The CHA has not added any income exclusions (excluding those required by HUD) in the calculation of adjusted income.
3. The CHA has an established minimum rent of \$50.00
4. The CHA is phasing in rent for qualified residents that transition from welfare to work according to section 508 of QHWRA. There will be no increase in their rent for the first year; it will increase 50% of the normal increase in the second year; it will fully phase in for the third year. Due to lack of demand from program participants, the CHA is not establishing individual savings accounts for these qualified residents.

FLAT RENTS

Beginning in October 1999, the Quality Housing and Work Responsibility Act of 1998 mandated that housing authorities implement changes, regarding the calculation of rents. The primary change was that each family that resides in public housing owned or operated by the agency is given an option regarding their rent. Those options are as follows:

Option 1: Income-based rent

Option 2: Flat rent

The Public Housing Program utilizes a flat rent which serves as a maximum rent for families regardless of income level. Under the 2014 Appropriations Act, PHA's must set flat rents at a minimum of 80% of the HUD published Fair Market Rent for the Housing Choice Voucher Program. Previously, the Authority implemented Flat Rents based on Small Area Fair Market Rents versus the Columbia-wide Fair Market Rent. The SAFMR were suspended by HUD in 2017 and no longer required to be used. HUD has recommended that the Authority revise its Flat Rents to coincide with the Columbia-wide FMR's. Flat rents be implemented pursuant to the guidance set forth in PIH Notice 2017-23 which establishes a phase-in for rent increase in excess of 35% per year for affected households. Public Housing flat rents must be a minimum of 80% of the HUD published Fair Market Rents regardless of household income and new FMR's were published by HUD with an effective date of October 1, 2019 as reflected in the table below:

Bedroom Size	0	1	2	3	4	5
HUD 2020 FMR (10/19)	\$706	\$818	\$931	\$1204	\$1491	\$1715
Flat Rent (Effective 10/1/2019)	\$565	\$654	\$745	\$963	\$1193	\$1372
Percent of HUD FMR	80%	80%	80%	80%	80%	80%

RESOLUTION 2019-660: Adoption of Revised Public Housing Flat Rents

HOUSING CHOICE VOUCHER/SECTION 8 PROGRAM

The Department of Housing and Urban Development (HUD) has issued instructions regarding the annual Fair Market Rents for the Section Housing Choice Voucher Program; and

WHEREAS, the Housing Authority is required by HUD regulations to determine Payment Standards within 90%-110% of the HUD established Fair Market Rents; and

Section 8/Housing Choice Voucher Program

1. The CHA is retaining the calculation of participant's contribution at the greater of 30% adjusted monthly income or 10% of monthly income.
2. The CHA has not added any income exclusions (excluding those required by HUD in the calculation of adjusted income).

The Payment Standard in the Housing Choice Voucher Program is used to determine the maximum amount of subsidy that can be paid on behalf of an assisted household. Payment Standards must be set between 90% and 110% of the applicable Fair Market Rent (FMR) published by HUD. The 2020 FMR was published by HUD on August 30th and will be effective October 1, 2019. The success rate in the Authority's tenant-based HCV program averaged 81% from January 2018 through March 2019. The success rate measures the number of families that receive a voucher and successfully lease an approved housing unit. Effective October 1, 2019, the Board of Commissions approved payment standards at 100% of the HUD published Fair Market Rent and a 110% for the Veteran's Supportive Housing (VASH) Program and for individuals with disabilities needing a reasonable accommodation. The policy continues to maintain Payment Standards between 90% to 110% of the Fair Market Rent.

2019 Approved Payment Standards

Bedroom Size	0	1	2	3	4	5
HUD 2020 FMR (10/19)	\$706	\$818	\$931	\$1204	\$1491	\$1715
CH Payment Standards	\$706	\$818	\$931	\$1204	\$1491	\$1715
Percent of HUD FMR	100%	100%	100%	100%	100%	100%
Exception Payment Standard VASHA/RA	\$777	\$900	\$1024	\$1324	\$1640	\$1887

RESOLUTION 2019-659: Adoption of Revised HCV Payment Standards

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

RESOLUTION 2020-003: Approval of the Housing Authority of City of Columbia, SC Public Housing Admissions and Continued Occupancy Plan Changes

BACKGROUND

The Admissions and Continued Occupancy Plan (ACOP) is the governing policy for the public housing program. It outlines Columbia Housing's policies for housing applicants and program participants. The ACOP has been updated to reflect current federal regulations and HUD mandates.

The Public Housing Admissions and Continued Occupancy Plan was presented to the Housing Authority of the City of Columbia's Executive Committee for review on Thursday, February 13, 2020.

RESOLUTION

WHEREAS, the Housing Authority of the City of Columbia, SC Board of Commissioners hereby approves the Public Housing Admissions and Continued Occupancy Plan; and

NOW THEREFORE BE IT FURTHER RESOLVED, by the Board of Commissioners of the Housing Authority of the City of Columbia, SC, that the Public Housing Admissions and Continued Occupancy Plan presented as an attachment to this Resolution be approved on this 20th day of February 2020.

**The 20th day of February 2020
BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC**

BY:



Ernest Cromartie, III, CHAIRMAN

ADMISSIONS AND CONTINUED OCCUPANCY PLAN



ADMISSIONS AND CONTINUED OCCUPANCY PLAN

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**COLUMBIA HOUSING OF
THE CITY OF COLUMBIA, SOUTH CAROLINA
ADMISSIONS AND CONTINUED OCCUPANCY POLICY**

This Admissions and Continued Occupancy Policy defines the policies of Columbia Housing of the City of Columbia, South Carolina, hereinafter referred to as CH, for the operation for the Public Housing Program, incorporating Federal, State and local law. If there is any conflict between this policy and laws and/or regulations, the laws and regulations will prevail.

1.0 FAIR HOUSING

It is the policy of Columbia Housing to fully comply 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.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under Columbia Housing's programs.

To further its commitment to full compliance with applicable Civil Rights laws, Columbia Housing will provide Federal/State/local information to applicants/tenants of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information is posted in the lobby, and all applicable Fair Housing Information and Discrimination Complaints are handled by the South Carolina State Human Affairs Commission, which is located at 2611 Forest Drive, Columbia, SC. The phone number is (803)737-7800.

In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

2.0 REASONABLE ACCOMMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of Columbia Housing's housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines Columbia Housing will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, Columbia Housing will ensure that all applicants/tenants are aware of the opportunity to request reasonable accommodations.

2.1 COMMUNICATION

Anyone requesting an application will also receive information regarding a Request for Reasonable Accommodation.

CH notifications of reexamination, inspection, appointment, or eviction will include information about requesting a reasonable accommodation. Any notification requesting action initiated by the tenant will also include information about requesting a reasonable accommodation.

All decisions granting or denying requests for reasonable accommodations will be in writing.

2.2 QUESTIONS TO ASK IN GRANTING THE ACCOMMODATION

- A. Is the requester a person with disabilities? For this purpose, the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is:

A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment. (The disability may not be apparent to others, i.e., a heart condition).

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, Columbia Housing will obtain verification that the person is a person with a disability.

- B. Is the requested accommodation related to the disability? If it is not apparent, Columbia Housing will obtain documentation that supports that the requested accommodation is needed due to the disability. Columbia Housing will not inquire as to the nature of the disability.
- C. Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:
1. Would the accommodation constitute a fundamental alteration? Columbia Housing's business is housing. If the request would alter the fundamental business that Columbia Housing conducts, that would not be reasonable. For instance, Columbia Housing would deny a request to have Columbia Housing do grocery shopping for a person with disabilities.
 2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently the requested accommodation costs little

or nothing. If the cost would be an undue burden, Columbia Housing may request a meeting with the individual to investigate and consider equally effective alternatives.

- D. Generally, the individual knows best what it is they need; however, Columbia Housing retains the right to be shown how the requested accommodation enables the individual to access or use Columbia Housing's programs or services.

If more than one accommodation is equally effective in providing access to Columbia Housing's programs and services, Columbia Housing retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by Columbia Housing if there is no one else willing to pay for the modifications. If another party pays for the modification, Columbia Housing will seek to have the same entity pay for any restoration costs.

Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

3.0 SERVICES FOR LIMITED ENGLISH PROFICIENT (LEP) APPLICANTS AND RESIDENTS/VOUCHER HOLDERS

Columbia Housing will endeavor to have bilingual staff or access to people who speak languages other than English in order to assist Limited English Proficient (LEP) speaking families. All services will be provided in accordance with the CH Board Approved LEP Policy.

4.0 FAMILY OUTREACH

Columbia Housing will publicize the availability and nature of the Public Housing Program for extremely low income, very low and low-income families in a newspaper of general circulation, minority media, Columbia Housing's website, Residents Newsletter and by other suitable means.

To reach people, who cannot or do not read the newspapers, Columbia Housing will distribute fact sheets to the broadcasting media and initiate personal contacts with members of the news media and community service personnel. Columbia Housing will also try to utilize public service announcements.

Columbia Housing will communicate the status of housing availability to other service providers in the community and inform them of housing eligibility factors and guidelines so they can make proper referrals for the Public Housing Program.

5.0 RIGHT TO PRIVACY

All adult members of both applicant and tenant households are required to sign HUD Form 9886, Authorization for Release of Information and Privacy Act Notice. The Authorization for Release of Information and Privacy Act Notice states how family information will be released and includes the Federal Privacy Act Statement.

Any request for applicant or tenant information will not be released unless there is a signed release of information request from the applicant or tenant.

6.0 REQUIRED POSTINGS

In each of its offices, Columbia Housing will post, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- A. Statement of Policies and Procedures governing Admission and Continued Occupancy
- B. Notice of the status of the waiting list (opened or closed)
- C. A listing of all the developments by name, address, number of units, units designed with special accommodations, address of all project offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours
- D. Income Limits for Admission
- E. Excess Utility Charges
- F. Utility Allowance Schedule
- G. Current Schedule of Routine Maintenance Charges
- H. Dwelling Lease
- I. Grievance Procedure
- J. Fair Housing Poster
- K. Equal Opportunity in Employment Poster
- L. Any current Columbia Housing Notices
- M. Flat Rent Schedule

6.1 RECORDS RETENTION

Documents and records for previous applicants, and previous tenants with no balances or concerns which would affect their obtaining housing from CH in the future, will be maintained for three (3) years after their separation from our waiting list and /or housing programs. Documents and/or files of previous tenants who left owing balances to Columbia Housing will be maintained indefinitely until such balance is cleared.

7.0 TAKING APPLICATIONS

7.1 TAKING APPLICATIONS FOR PUBLIC HOUSING

Families wishing to apply for the Public Housing will be required to complete an application for housing assistance. Applications will be accepted only by computer, 24 hours a day, and seven days a week.

The primary method of application is through CH's website: www.columbiahousingsc.org. Computer kiosks are available from 8:00am to 5:00pm, Monday through Friday, with holidays excepted, at the central office of Columbia Housing at 1917 Harden Street, Columbia, SC 29204.

Other locations may become available and will be advertised by Public Notice.

The application date/time will be determined by the date and time the application reaches Columbia Housing's computer system (EST) for those using computers and by the stamp date for all applications that may be accepted via FAX, internet, mail, or hand delivery during regular office hours (8:00am-5:00pm, Monday thru Friday, with the exception of public holidays).

Applications are taken to compile a waiting list. Due to the demand for housing in Columbia Housing's jurisdiction, Columbia Housing may take applications on an open enrollment basis, depending on the length of the waiting list.

Applications will be accepted from all applicants and Columbia Housing will verify the information. Applications for multiple programs can be placed on the same application only at the time the initial application is placed. Other programs cannot be added after initial application date. If the applicant wants to apply for another program at a later date, a separate application is required.

All applicants are encouraged to apply on the internet through the CH website: <http://www.columbiahousingsc.org>. Applications may be made in person at one of the computer kiosks at Columbia Housing's Main Office from 8:00am to 5:00pm, Monday through Friday with holidays excepted. Applications will be mailed upon request to elderly and disabled families.

Hand delivered housing applications will be validated by Columbia Housing upon receipt with the current date and time.

Persons with disabilities who require a reasonable accommodation in completing an application may call Columbia Housing to make special arrangements. A Telecommunication Device for the Deaf (TDD) is available. The TDD telephone number is (803) 256-7762. Applicants may also use Relay South Carolina by calling 1-800-735 2905.

The application process will involve two phases. The first phase is the initial pre-application for housing assistance. The application requires the family to provide limited basic information establishing any preferences to which they may be entitled. This first phase results in the family's initial eligibility determination and placement on the waiting list, if eligible.

Columbia Housing will notify the family in writing of the date and time of placement on the waiting list, and the approximate wait time before housing may be offered. If Columbia Housing determines the family to be ineligible, the notice will state the reason(s) therefore and will offer the family the opportunity of an informal review of the determination.

The applicant must report in writing changes in his/her applicant status including changes in address, family composition, income or preference factors. Columbia Housing will annotate the applicant's file and will update their place on the waiting list.

The second phase is the final determination of eligibility, referred to as the application update. The application update takes place when the family nears the top of the waiting list. Columbia Housing will ensure that verification of all preferences, eligibility, suitability and selection factors are current within 120 days for Public Housing in order to determine the family's final eligibility for admission into the program.

Depending on the length of the waiting list, several updates may be required before an applicant is housed.

7.2 TAKING APPLICATIONS FOR THE HOMEOWNERSHIP PROGRAM

Families wishing to apply for the Homeownership Program will be required to complete a Homeownership application. Homeownership applications will be accepted during posted application hours at the following locations:

1. Columbia Housing
1917 Harden Street
Columbia, SC 29204
2. Other locations as specified by Public Notice

Homeownership applications are taken to compile a waiting list and Columbia Housing will verify the information contained on the applications.

Homeownership applications may be made in person at Columbia Housing's Main Office during regular work hours which are Monday through Friday from 8 a.m. until 5 p.m. (holidays excepted).

Persons with disabilities who require a reasonable accommodation in completing an application may call Columbia Housing to make special arrangements. A Telecommunication Device for the Deaf (TDD) is available. The TDD telephone number is (803) 256-7762. Applicants may also use Relay South Carolina by calling 1-800-735-2905.

The homeownership application process will involve two phases. The first phase is the initial homeownership application. The homeownership application requires the family to provide limited basic information (including income) establishing any preferences to which they may be entitled. This first phase results in the family's placement on the waiting list.

Upon receipt of the family's homeownership application, Columbia Housing will make a preliminary determination of eligibility. Columbia Housing will notify the family in writing of the date and time of placement on the waiting list, and the approximate wait before housing may be offered. If Columbia Housing determines the family to be ineligible, the notice will state the reasons therefore and will offer the family the opportunity of an informal review of the determination.

The applicant must report in writing changes in his/her applicant status including changes in address, family composition income, or preference factors. Columbia Housing will annotate the applicant's file and will update their place on the waiting list.

The second phase is the final determination of eligibility, referred to as the application update. The application update takes place when the family nears the top of the waiting list. Columbia Housing will ensure that verification of all preferences, eligibility, suitability and selection factors are current within 120 days in order to determine the family's final eligibility for admission into the Public Housing Program.

Depending on the length of the waiting list, several updates may be required before an applicant is housed.

8.0 ELIGIBILITY FOR ADMISSION

8.1 INTRODUCTION

There are five eligibility requirements for admission to the Public Housing program and they are as follows: must qualify as a family, have an income within the current income limits, must meet citizenship/eligible immigrant criteria, must provide documentation of Social Security numbers and must sign all required Columbia Housing documents. In addition to the eligibility criteria, families must also meet Columbia Housing screening criteria in order to be admitted to public housing.

8.2 ELIGIBILITY CRITERIA

A. Family status.

1. A **family with or without children**. Such a family is defined as:
 - a. A group of people related by blood, marriage, or adoption that live together in a stable family relationship.
 - b. Two or more persons who intend to share residency whose income and resources are available to meet the family's needs and who have a history as a family unit or show evidence of a stable family relationship.
 - c. Children temporarily absent from the home due to placement in foster care are considered family members.
 - d. Unborn children and children in the process of being adopted are considered family members for the purpose of determining bedroom size but are not considered family members for determining income limit.
2. An **elderly family**, which is:
 - a. A family whose head of household, spouse or sole member is a person who is at least 62 years of age;
 - b. Two or more persons who are at least 62 years of age living together; or
 - c. One or more persons who are at least 62 years of age living with one or more live-in aides.
3. A **near-elderly family**, which is:
 - a. A family whose head of household, spouse or sole member is a person who is at least 50 years of age but below the age of 62;
 - b. Two or more persons, who are at least 50 years of age but below the age of 62, living together; or
 - c. One or more persons who are at least 50 years of age but below the age of 62, living with one or more live-in aides.

4. A **disabled family** is:
 - a. A family whose head of household, spouse or sole member is a person with disabilities;
 - b. Two or more persons with disabilities living together; or
 - c. One or more persons with disabilities living with one or more live-in aides.
5. A **displaced family**, which is a family in which each member, or whose sole member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
6. A **remaining member of a tenant family**.
7. A **single person** who is not an elderly or displaced person, a person with disabilities, or the remaining member of a tenant family.

B. Income eligibility

1. The family income cannot exceed 80 percent of the median income for the area.
2. Income limits apply only at admission and are not applicable for continued occupancy.
3. A family may not be admitted to the public housing program from another assisted housing program (e.g., tenant-based Section 8) or from a public housing program operated by another Columbia Housing without meeting the income requirements of Columbia Housing.
4. If Columbia Housing acquires a property for federal public housing purposes, the families living there must have incomes within the low-income limit in order to be eligible to remain as public housing tenants.
5. Income limit restrictions do not apply to families transferring within our Public Housing Program.

C. Citizenship/Eligibility Status

1. To be eligible each member of the family must be a citizen, national, or a non-citizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)).

2. Family eligibility for assistance.

- a. A family shall not be eligible for assistance unless every member of the family residing in the unit is determined to have eligible status, with the exception noted below.
- b. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance. (See Section 13.5 for calculating rents under the non-citizen rule)
- c. A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

D. Social Security Number Documentation

To be eligible, all family members must be provided a Social Security number.

E. Signing Consent Forms

- 1. In order to be eligible, each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.
- 2. The consent form must contain, at a minimum, the following:
 - a. A provision authorizing HUD or Columbia Housing to obtain from State Wage Information Collection Agencies (SWICAs) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy; and
 - b. A provision authorizing HUD or Columbia Housing to verify with previous or current employer's income information pertinent to the family's eligibility for or level of assistance;
 - c. Financial institutions;
 - d. A provision authorizing HUD to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits; and
 - e. A provision authorizing HUD or Columbia Housing to verify with financial institutions information regarding income pertinent to the family's eligibility and level of assistance;

- f. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

8.3 SUITABILITY

- A. Applicant families will be evaluated to determine whether, based on their recent behavior, such behavior could reasonably be expected to result in noncompliance with the Public Housing lease. Columbia Housing will look at past conduct as an indicator of future conduct. Emphasis will be placed on whether a family's admission could reasonably be expected to have a detrimental effect on the development environment, other tenants, Columbia Housing employees, or other people residing in the immediate vicinity of the property. Otherwise eligible families will be denied admission if they fail to meet the suitability criteria.
- B. Columbia Housing will consider objective and reasonable aspects of the family's background, including the following:
 - 1. History of meeting financial obligations, especially rent;
 - 2. Ability to maintain (or with assistance would have the ability to maintain) their housing in a decent and safe condition based on living or housekeeping habits and whether such habits could adversely affect the health, safety, or welfare of other tenants;
 - 3. History of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug related criminal activity that would adversely affect the health, safety, or well-being of other tenants or staff or cause damage to the property;
 - 3. History of disturbing neighbors or destruction of property;
 - 4. Having committed fraud in connection with any Federal housing assistance program including the intentional misrepresentation of information related to their housing application or benefits derived there from; and
 - 5. History of abusing alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment by others.
- C. Columbia Housing will ask applicants to provide information demonstrating their ability to comply with the essential elements of the lease. Columbia Housing will verify the information provided. Such verification may include but may not be limited to the following:
 - 1. A credit check of all family members who are 18 and older;

2. A rental history check of all adult family members;
3. A criminal background check on all adult household members, including live-in aides. This check will be made through State or local law enforcement or court records in those cases where the household member has lived in the local jurisdiction for the last five years. Where the individual has lived outside the local area, Columbia Housing may contact law enforcement agencies where the individual had lived or request a check through the FBI's National Crime Information Center (NCIC). Columbia Housing reserves the right to fingerprint any applicant in order to carry out this background check;
4. A check of the lifetime sex offender registration program for each adult household member, including live-in aides. No individual registered with this program will be admitted to public housing.

8.4 GROUNDS FOR DENIAL

Columbia Housing is not required or obligated to assist applicants who:

- A. Do not meet any one or more of the eligibility criteria;
- B. Do not supply information or documentation to include Social Security numbers for all family members on application as required by the application process;
- C. Have failed to respond to a written appointment, request for information or a request to declare their continued interest in the program;
- D. Have a history of not meeting financial obligations, especially rent;
- E. Do not have the ability to maintain (with assistance) their housing in a decent and safe condition where such habits could adversely affect the health, safety or welfare of other tenants;
- F. Have a history of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well-being of other tenants or staff or cause damage to the property.
 1. However, if an applicant or participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking it is not appropriate to deny him/her program assistance or admission into public housing. Nothing in this section supersedes a Federal, State, or local law that provides greater protection for victims.

- G. Have a history of disturbing neighbors or destruction of property.

The following circumstances will result in automatic denial upon verification from applicant or any background source:

- A. Currently owes rent or other amounts to any federally assisted housing entity in connection with their housing assistance programs;
- B. Have committed fraud, bribery or any other corruption in connection with any Federal housing assistance program including the intentional misrepresentation of information related to their housing application or benefits derived there from;
- C. Have been involved with or formally charged in drug-related criminal activity involving the personal use or possession for personal use within five years of the projected date of admission into Public housing;
- D. Have been involved with or formally charged in drug-related criminal activity involving the illegal manufacture, sale, distribution, or possession with the intent to manufacture, sell, distribute a controlled substance as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802 within five years of the projected date of admission;

Are illegally using a controlled substance or are abusing alcohol in a way that may interfere with the health safety, or right to peaceful enjoyment of the premises by other residents. Columbia Housing may waive this requirement if:

- 1. The person demonstrates to Columbia Housing's satisfaction that the person is no longer engaging in drug-related criminal activity or abuse of alcohol;
 - 2. Has successfully completed a supervised drug or alcohol rehabilitation program;
 - 3. Has otherwise been rehabilitated successfully with the documentation of a CH-recognized program; or
 - 4. Is participating in a supervised drug or alcohol rehabilitation program.
- F. Have engaged in or threatened abusive or violent behavior towards any Columbia Housing staff or residents;
 - G. Have a household member who has been evicted from federally assisted housing within the last five years;
 - H. Have a family household member who has been terminated under the certificate or voucher program;

- I. Are under the age of 18, unless so ordered by a court;
- J. Denied for Life: If any family member has been convicted of manufacturing or producing any illegal drug in a public housing development;
- K. Denied for Life: If any member has a lifetime registration under a State sex offender registration program.

8.5 **INFORMAL REVIEW**

- A. If Columbia Housing determines that an applicant does not meet the criteria for receiving public housing assistance, Columbia Housing will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision and state that the applicant may request an informal review of the decision within 10 business days of the denial. Columbia Housing will describe how to obtain the informal review.

The informal review may be conducted by any person designated by Columbia Housing, other than a person who made or approved the decision under review or subordinate of this person. The applicant must be given the opportunity to present written or oral objections to Columbia Housing's decision. Columbia Housing must notify the applicant of the final decision within 14 calendar days after the informal review, including a brief statement of the reasons for the final decision.

- B. The participant family may request that Columbia Housing provide for an Informal Hearing after the family has notification of an INS decision on their citizenship status on appeal or in lieu of request of appeal to the INS. The participant family must make this request within 30 days of receipt of the Notice of Denial or Termination of Assistance, or within 30 days of receipt of the INS appeal decision.

For the participant families, the Informal Hearing Process above will be utilized with the exception that the participant family will have up to 30 days of receipt of the Notice of Denial or Termination of Assistance, or of the INS appeal decision.

8.6 **REINSTATEMENT OF A DENIAL APPLICATION**

An applicant file may be reinstated for good cause (example, CH error) or as a result of a hearing. Reinstatement must be approved by the Executive Director or his representative. Reinstatements are made effective on the date of such action unless a Columbia Housing error has occurred.

8.7 ORIENTATION AND SCREENING

A. Standards for Determining Suitability for Public Housing

1. A thorough evaluation of applicants is one of Columbia Housing's most important jobs. It is essential in maintaining well-managed communities.
2. The CH will make an informed judgment about the applicant's suitability as outlined 8.3.C.

Prior to signing the lease all families (head of household) and other adult family members will be required to attend the Lease and Occupancy Orientation when they are initially accepted.

9.0 MANAGING THE WAITING LIST

9.1 OPENING AND CLOSING THE WAITING LIST

Opening of the waiting list will be announced with a 30 day advance public notice stating that applications for public housing will again be accepted. The public notice will state where, when and how to apply. The notice will be published in a local newspaper of general circulation and also by any available minority media. The public notice will state any limitations as to who may apply. The notice will include the Fair Housing logo and slogan and will be in compliance with Fair Housing requirements.

Closing of the waiting list will also be announced with a public notice. The public notice will state the date the waiting list will be closed and for what bedroom sizes. The public notice will be published in a local newspaper of general circulation.

CH will also contact non-profit organizations to inform them of the opportunity to complete a housing application for any program.

9.2 ORGANIZATION OF THE PUBLIC HOUSING WAITING LIST

The waiting list will be maintained in accordance with the following guidelines:

- A. The application will be in each file and be retained in accordance with CH's document retention policy;
- B. All applications will be maintained in order of bedroom size, category preferences, and then in order of date and time of application; and
- C. Any written contacts or formal meetings between Columbia Housing and the applicant will be documented in the applicant files.

9.3 FAMILIES NEARING THE TOP OF THE WAITING LIST

When a family appears to be within three (3) months of being offered a unit, the family will be invited to an interview and the verification process will begin. It is at this point in time that the family's waiting list preference will be verified. If the family no longer qualifies to be near the top of the list, the family's name will be returned to the appropriate spot on the waiting list. Columbia Housing must notify the family in writing of this determination and give the family the opportunity for an informal review.

The family will complete a full application, present Social Security number information, citizenship/eligible immigrant information and sign the Consent for Release of Information forms and other required CH documents.

9.4 PURGING THE WAITING LIST

Columbia Housing will update and purge its waiting list at least annually to ensure that the pool of applicants reasonably represents the interested families for whom Columbia Housing has current information, i.e. applicant's address, family composition, income category, and preferences.

9.5 REMOVAL OF APPLICANTS FROM THE WAITING LIST

Columbia Housing will not remove an applicant's name from the waiting list unless:

- A. The applicant requests in writing that their name be removed;
- B. The applicant fails to respond to a written request for appointment, for information or a request to declare their continued interest in the program; or
- C. The applicant does not meet either the eligibility or suitability criteria for the program.
- D. The applicant cannot be reached by mail at the addresses provided by the applicant.
- E. The applicant does not return requested documentation in given time frame.

9.6 MISSED APPOINTMENTS

Failure to keep a scheduled appointment with Columbia Housing will result in termination of the process for eligibility and removal of the application from the waiting list.

Columbia Housing will allow the family to reschedule for good cause. Generally, no more than one opportunity will be given to reschedule without good cause. When good cause exists for missing an appointment, Columbia Housing will work closely with the family to find a more suitable time. Applicants will be offered the right to an informal review after being removed from the waiting list.

9.7 NOTIFICATION OF NEGATIVE ACTIONS

When an applicant is notified in writing by CH of an appointment or request for information, they will be given a time and date to make the appointment or to bring in the requested information. They will also be advised that failure to meet said requirements will result in removal from the Waiting List.

If an applicant claims that their failure to respond to a request for information or updates was caused by a disability, Columbia Housing will verify that there is in fact a disability, and the disability caused the failure to respond and provide a reasonable accommodation. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

10.0 TENANT SELECTION AND ASSIGNMENT PLAN

10.1 PREFERENCES FOR ADMISSION

A. PREFERENCES

Columbia Housing will select families based on the following preferences within each bedroom size category:

PUBLIC HOUSING (CH operates under a HUD-approved site-based waiting list)

a. Displaced person(s): Individuals or families displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal Disaster Relief Laws.

b. All other applicants.

Based on the above preferences, all families in preference A will be offered housing before any families in preference B.

Units Designated for the Elderly: Preference will be given to elderly persons who are sixty-two years of age or older. If there are no elderly families on the list, preference will then be given to near-elderly families. If there are no near-elderly families on the waiting list, units will be offered to families who qualify for the appropriate bedroom size using these priorities. All such families will be selected from the waiting list using the preferences as outlined above.

Accessible Units: Accessible units will be first offered to families who may benefit from the accessible features. Applicants for these units will be selected utilizing the same preference system as outlined above. If there are no applicants who would benefit from the accessible features, the units will be offered to other applicants in the order that their names come to the top of the waiting list. Such applicants, however, must sign a release form

stating they will accept a transfer (at their own expense) if at a future time, a family requiring an accessible feature applies. Any family required to transfer will be given a 30-day notice.

B. EXCEPTIONS FOR SPECIAL ADMISSION

If HUD awards Columbia Housing's program funding that is targeted for specifically named families, Columbia Housing will admit these families under this procedure.

Special admissions families will be admitted outside of the regular waiting list process. They do not have to qualify for any preferences nor are they required to be on the program waiting list. Columbia Housing maintains separate records of these admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified unit:

- a. A family displaced because of demolition or disposition of a public housing project;
- b. A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;
- c. For housing covered by the Low-Income Housing Preservation and Resident Homeownership Act of 1990; and
- d. Exceptions by Executive Director as found in the section 21.2 of this policy.

C. TARGETED FUNDING

When HUD awards special funding for certain family types, families who qualify are placed on the regular waiting list. When a specific type of funding becomes available, the waiting list is searched for the first available family meeting the targeted funding criteria

Applicants who are admitted under targeted funding which are not identified as a Special Admission are identified by code in an automated system.

Columbia Housing Section 8 Program has the following "targeted" programs:

- a. Disabled Families
- b. Homeless (3-bedrooms) Families
- c. Single-Room Occupancy (SRO program)
- d. HOPWA (Housing Opportunities for Persons with AIDS)

- e. VASH (Veteran Affairs Supportive Housing)
- f. Permanent Supportive Housing

10.2 ASSIGNMENT OF BEDROOM SIZES

The following guidelines will determine each family's unit size without overcrowding or over-housing:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
0	1	1
1	1	2
2	2	4
3	3	6 (4 at Latimer Manor)
4	4	8 (6 at Latimer Manor)
5	5	10

These standards are based on the assumption that each bedroom will accommodate no more than two (2) persons. Zero-bedroom units will only be assigned to one-person families.

In determining bedroom size, Columbia Housing may include the presence of children to be born to a pregnant woman, children who are in the process of being adopted, children whose custody is being obtained, children who are temporarily away at school or children who are temporarily in foster care.

In addition, the following considerations may be taken in determining bedroom size:

- A. Children of the same sex will share a bedroom.
- B. Children of the opposite sex may share a bedroom.
- C. Adults and children will not be required to share a bedroom.
- D. Foster adults and/or foster children will not be required to share a bedroom with adult family members.
- E. Live-in aides will get a separate bedroom.

Exceptions to normal bedroom size standards include the following:

- A. Units smaller than assigned through the above guidelines - A family may request a smaller unit size than the guidelines allow. Persons of different generations, persons of the opposite sex (other than spouses) and unrelated adults may have separate bedrooms. However, the decision as to where the family members sleep will be left up to the head of household at the time of their initial interview. In Public Housing, the family will not be allowed to transfer to a larger or smaller unit unless the family composition changes.
- B. Units larger than assigned through the above guidelines - A family may request a larger unit size than the guidelines allow. Columbia Housing will allow the larger size unit if the family provides a verified medical need that the family is housed in a larger unit.
- C. If there are no families on the waiting list for a larger size, smaller families may be housed if they sign a release form stating they will transfer (at the family's own expense) to the appropriate size unit when an eligible family needing the larger unit applies. The family transferring will be given a 30-day notice before being required to move.
- D. Larger units may be offered in order to improve the marketing of a development suffering a high vacancy rate.

10.3 SELECTION FROM THE WAITING LIST

All applicants will complete a pre-application which places them on the waiting list for the Public Housing program provided by Columbia Housing.

Families interested in the Public Housing Program have the option of choosing from four categories: Senior Housing, Standard Housing, Cayce Housing and Eastover Housing. If no category is selected by the applicant at time of application, the application will default to the Standard Category.

The application will be placed on the waiting list of the applicant's choice by date, time, bedroom size, application number and any preference for which they may be eligible.

The applicant's name will appear on all programs for which they applied, and which are open at the time of application.

When it is anticipated the applicant will be housed within 120 days, the file will be updated. At this time, the applicant will affirm their choices.

All information required per the Admissions and Continued Occupancy Policy will be verified and all documents required will be obtained from the applicant and other sources. If it is found that the applicant does not qualify for a category by age, they will be notified promptly in writing. The applicant will be given the opportunity to change their selection of categories if they are no longer eligible due to bedroom size and the bedroom size for their family is not available in the previously selected categories.

All applicants for Public Housing will be subject to meeting the "Standards for Determining Suitability for Public Housing Tenancy as set forth in the Admissions and Continued Occupancy Policy, Section V, paragraph A, B, C. All applicants who have been updated must be approved by the CH Selection Committee.

Denials for admission to housing will follow Section V, paragraph D (Denying Admission) in the CH Admissions and Continued Occupancy Policy.

ORGANIZATION OF THE WAITING LIST

- A. All applicants are placed on the waiting list, for the bedroom size that they are eligible for, at the time of application. Applicants will remain on the waiting list until which time an available unit is anticipated within 120 days. Applicants will be selected for screening and placement, if eligible.
- B. The Waiting List will be organized and maintained in a way to easily identify an applicant. The Waiting List will be organized by:
 - Program
 - Category
 - Preference
 - Bedroom size and type of unit needed
 - Date and Time of application
 - Deconcentration of Poverty

Before an application is sent for a housing vacancy, the information in the file of an eligible applicant must be current within 120 days for Public Housing.

When housing is not provided during the applicable period, these applicant files will be updated again.

To maintain a well-balanced pool of eligible files, Columbia Housing will:

- a. Attempt to maintain a sufficient number and variety of applicants to fill vacancies as they arise.
- b. Attempt to get a broad, social, ethnic and economic mixture of eligible applicants (for Public Housing only)

- c. Not to seek more applicants than can be served within a reasonable time period.
- d. Develop procedures to identify those applicants who would no longer qualify or are no longer interested in remaining on the Waiting List.

The above objectives will be accomplished through:

- a. Outreach to get additional applicants.
- b. Closing the Waiting List to new applicants.
- c. Updating the Waiting List to remove the names of those who are no longer interested or no longer qualify.

An applicant's name will be removed from the waiting list only if:

- a. The applicant requests in person or in writing that their name be removed from the Waiting List.
- b. The applicant was clearly advised by mail of a requirement to tell Columbia Housing of its continued interest but has failed to do so.
- c. The applicant has been notified by Columbia Housing of its intention to remove their name from the Waiting List because they are no longer eligible for housing.
- d. The applicant does not keep an appointment nor has rescheduled that appointment or cannot be reached by mail, the file will be deleted. The file may be reinstated within ninety (90) days following failure to keep an appointment or the return of the mail if the applicant had a situation beyond their control at the time of the appointment.
- e. The applicant does not return requested documentation in given time frame.

The following conditions would not be considered a refusal of housing:

- a. The type of available unit for which housing assistance is being offered will not assure the applicant's capability to maintain an independent living condition.
- b. The unit is not of the proper size and type, and the applicant would only be able to reside there only temporarily.
- c. The unit contains lead paint and accepting the offer could result in subjecting children less than seven years of age to lead paint poisoning.

- d. The applicant is unable to move at the time of the offer and presents clear evidence which substantiates this to CH. Examples are:
 - i. A doctor verifies that the applicant has just undergone major surgery and needs a period of time to recuperate.
 - ii. A court testifies that the applicant is serving on a jury which has been sequestered.
- e. An applicant under temporary financial hardship that will be remedied within thirty (30) days will be given a thirty (30) day extension. At the end of the thirty (30) days, another unit will be offered upon availability. His condition must have the Executive Director's approval in writing.

METHODS BY WHICH APPLICANTS WILL BE CHOSEN FROM THE WAITING LIST AND OFFERED AVAILABLE HOUSING ASSISTANCE

- A. In offering housing assistance in Public Housing, the applicant will be selected in the following order:
 - a. By category selected by the applicant.
 - b. By bedroom size and type of unit.
 - c. By applicants with the earliest application date and time who qualify for a preference.
 - d. By applicants with the earliest date and time who do not qualify for a preference.
 - e. Deconcentration.

APPLICANT SELECTION AND ASSIGNMENT

- 1. Records will be maintained in the applicant folders on all offers, acceptances and refusals, to include location, date and time, the circumstances of each offer and rejections and other information considered pertinent.
- 2. When housing is available for new residents, the appropriate staff person will request eligible applicant files from the CH Applications Department, to consider for housing assistance.

3. After receiving the request, the next eligible file is selected, according to the procedures outlined under "Method By Which Applicants will be Chosen from the Waiting List and Offered Available Housing Assistance".
4. After receiving the application, the appropriate staff person will contact the applicant by phone and follow this with a letter setting up an appointment to show the vacant unit. Every effort will be made to contact the applicant.
5. If the applicant accepts the housing offer, it will be noted on the contact sheet located in the applicant's file which unit was offered and accepted with the date of the acceptance.
6. If the applicant refuses the offer of housing assistance, the staff person will document the contact sheet of the applicant's file stating the unit offered by CH and refused by the applicant, along with the reason given by the applicant for the refusal of a category selected by the applicant. The file will be promptly returned to the Application's Department.
7. Refusal of an offer of housing will be reviewed by the Applications Department. If none of the conditions considered a valid reason for refusal, as set forth in this policy are present, the application will be removed from the Waiting List.

Columbia Housing shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income. To ensure this requirement is met, we shall quarterly monitor the incomes of newly admitted families and the incomes of the families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, we will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list, we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

10.4 DECONCENTRATION POLICY IN PUBLIC HOUSING

It is Columbia Housing's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income communities and lower income families into higher income communities. Toward this end, we may skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminatory manner.

Columbia Housing will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our communities, the income levels of census tracts in which our communities are located and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement. This information is available in Columbia Housing's Deconcentration of Poverty Plan.

10.5 DECONCENTRATION INCENTIVES IN PUBLIC HOUSING

Columbia Housing may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular community.

Various incentives may be used at different times or under different conditions but will always be provided in a consistent and nondiscriminatory manner.

10.6 OFFER OF A PUBLIC HOUSING UNIT

When Columbia Housing discovers that a unit will become available, we will contact the first family on the waiting list who has the highest priority for this type of unit or development and whose income category would help to meet the deconcentration goal and/or the income targeting goal.

Columbia Housing will contact the family by mail to make the unit offer. The family will be given five (5) business days from the date the letter was mailed to contact Columbia Housing regarding the offer.

The family will be offered the opportunity to view the unit. After the opportunity to view the unit, the family will have two (2) business days to accept or reject the unit. This verbal offer and the family's decision must be documented in the tenant file. If the family rejects the offer of the unit, Columbia Housing will send the family a letter documenting the offer and the rejection.

10.7 REJECTION OF A PUBLIC HOUSING UNIT

If, in making the offer to the family, Columbia Housing skipped over other families on the waiting list in order to meet their deconcentration goal or offered the family any other deconcentration incentive and the family rejects the unit, the family will not lose their place on the waiting list and will not be otherwise penalized.

If Columbia Housing did not skip over other families on the waiting list to reach this family, did not offer any other deconcentration incentive and the family rejects the unit without good cause, the family's application will be removed from the waiting list.

If the family rejects with good cause any unit offered, they will not lose their place on the waiting list. Good cause includes reasons related to health, proximity to work, school and childcare (for those working or going to school). The family will be offered the right to an informal review of the decision to alter their application status.

10.8 ACCEPTANCE OF A PUBLIC HOUSING UNIT

The family will be required to sign a lease that will become effective no later than three (3) business days after the date of acceptance or the business day after the day the unit becomes available, whichever is later.

No family will be housed if they have not attended the Lease and Occupancy Orientation. Applicants who provide prior notice of an inability to attend either process will be rescheduled. Failure of an applicant to attend the Lease and Occupancy Orientation without good cause may result in the cancellation of the occupancy process and withdrawal from the waiting list.

The applicant will be provided a copy of the lease, the grievance procedure, utility allowances, utility charges, the current schedule of routine maintenance charges, a request for reasonable accommodation form and other required CH documents. These documents will be explained in detail. The applicant will sign a certification that they have received these documents and that they have reviewed them with Columbia Housing personnel. The certification will be filed in the tenant's file.

The signing of the lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. One executed copy of the lease will be furnished to the head of household and Columbia Housing will retain the original executed lease in the tenant's file. A copy of the grievance procedure will be attached to the resident's copy of the lease.

The family will pay a security deposit at the time of lease signing. The security deposit will be equal to a set amount based on bedroom size determined by CH and approved by the Columbia Housing Board of Commissioners.

Columbia Housing reserves the right to allow a new resident to pay their security deposit in up to four (4) payments. One half shall be paid in advance, one-sixth with their second rent payment, one sixth with their third rent payment and one-sixth with their fourth rent payment. This shall be at the sole discretion of Columbia Housing.

In the case of a move within public housing, the security deposit for the first unit will be transferred to the second unit. Additionally, if the security deposit for the second unit is

greater than that for the first, the difference will be collected from the family. Conversely, if the security deposit is less, the difference will be refunded to the family at the sole discretion of the manager.

In the event there are costs attributable to the family for bringing the first unit into condition for re-renting, the family shall be billed and responsible to pay for these charges.

11.0 INCOME, EXCLUSIONS FROM INCOME, AND DEDUCTIONS FROM INCOME

To determine annual income, Columbia Housing counts the income of all family members, except the types and sources of income that are specifically excluded as identified in this policy and by law. Once the annual income is determined, Columbia Housing subtracts all allowable deductions (allowances) to determine the Total Tenant Payment.

11.1 INCOME

Annual income means all amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- C. Are not specifically excluded from annual income.

Annual income includes, but is not limited to:

- A. The full amount, before any payroll deductions of wages and salaries, overtime pay, commissions, fees, tips and bonuses and other compensation for personal services.
- B. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is a reimbursement of cash or assets invested in the operation by the family.
- C. Interest, dividends and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of

assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.

- D. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (however, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)
- E. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay. (However, lump sum additions, such as insurance payments from worker's compensation, are excluded.)
- F. Welfare assistance
 - 1. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income consists of:
 - a. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
 - b. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.
 - 2. If the amount of welfare is reduced due to an act of fraud by a family member or because of any family member's failure to comply with requirements to participate in an economic self-sufficiency program or work activity, the amount of rent required to be paid by the family will not be decreased. In such cases, the amount of income attributable to the family

will include what the family would have received had they complied with the welfare requirements and/or had not committed an act of fraud.

3. If the amount of welfare assistance is reduced as a result of a lifetime time limit, the reduced amount is the amount that shall be counted as income.
- G. Periodic and determinable allowances, such as alimony, child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
- H. All regular pay, special pay and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)
- I. The portion of any athletic scholarship assistance available for housing costs will be verified by CH with the third-party income source and included in the determination of family adjusted income.

11.2 EXCLUDED/ANNUAL INCOME

Annual income does not include the following:

- A. Income from employment of children (including foster children) under the age of 18 years;
- B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- C. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses;
- D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- E. Income of a live-in aide;
- F. The full amount of student financial assistance paid directly to the student or to the educational institution;
- G. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- H. The amounts received from the following programs:
 1. Amounts received under training programs funded by HUD;
 2. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and

benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

3. Amounts received by a participant in other publicly assisted programs that are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and that are made solely to allow participation in a specific program;
4. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for Columbia Housing or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;
5. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program;
6. Temporary, nonrecurring or sporadic income (including gifts);
7. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
8. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
9. Adoption assistance payments in excess of \$480 per adopted child;
10. For family members who enrolled in certain training programs prior to 10/1/99, the earnings and benefits resulting from the participation if the program provides employment training and supportive services in accordance with the Family Support Act of 1988, Section 22 of the 1937 Act (42 U.S.C. 1437t), or any comparable Federal, State, or local law during the exclusion period. For purposes of this exclusion the following definitions apply:

- a. Comparable Federal, State or local law means a program providing employment training and supportive services that meet all of the following conditions:
 - i. Is authorized by a Federal, State or local law;
 - ii. Is funded by the Federal, State or local government;
 - iii. Is operated or administered by a public agency; and
 - iv. Has as its objective to assist participants in acquiring employment skills.
 - b. Exclusion period means the period during which the family member participates in a program described in this section, plus 18 months from the date the family member begins the first job acquired by the family member after completion of such program that is not funded by public housing assistance under the 1937 Act. If the family member is terminated from employment with good cause, the exclusion period shall end.
 - c. Earnings and benefits mean the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.
11. The incremental earnings due to employment during the 12-month period following date of hire shall be excluded. Additionally, beginning the 13th month, the tenant's Earned Income Disregard will continue at 50% up through the 24 month. Effective May 1, 2016, the maximum period for the Earned Income Disregard is a straight 24-months period with a clear start date and end date, irrespective of whether a family maintains continued employment during the 24-month period. Families enrolled in the Earned Income Disregard prior to May 1, 2016, will remain on the previous guidance, with a 48-month maximum. This exclusion (paragraph 11) will not apply for any family who concurrently is eligible for exclusion #10. Additionally, this exclusion is only available to the following families:
- a. Families whose income increases as a result of employment of a family member who was previously unemployed for one or more years.
 - b. Families whose income increases during the participation of a family member in any family self-sufficiency program.
 - c. Families who are or were, within 6 months, assisted under a State TANF Program.

(While HUD regulations allow for Columbia Housing to offer an escrow account in lieu of having a portion of their income excluded under this paragraph, it is the policy of this Columbia Housing to provide the exclusion in all cases.)

12. Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;
13. Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;
14. Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
15. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits. These exclusions include:
 - a. The value of the allotment of food stamps.
 - b. Payments to volunteers under the Domestic Volunteer Services Act of 1973.
 - c. Payments received under the Alaska Native Claims Settlement Act.
 - d. Income from sub marginal land of the U.S. that is held in trust for certain Indian tribes.
 - e. Payments made under HHS's Low-Income Energy Assistance Program.
 - f. Payments received under the Job Training Partnership Act/Workforce Investment Act of 1998.
 - g. Income from the disposition of funds of the Grand River Band of Ottawa Indians.
 - h. The first \$2000 per capita received from judgment funds awarded for certain Indian claims.
 1. Amount of scholarships awarded under Title IV including Work-Study.
 - J. Payments received under the Older Americans Act of 1965.

- k. Payments from Agent Orange Settlement.
- l. Payments received under the Maine Indian Claims Act.
- m. The value of childcare under the Child Care and Development Block Grant Act of 1990.
- n. Earned income tax credit refund payments.
- o. Payments for living expenses under the AmeriCorps Program.
- p. Additional income exclusions provided by and funded by Columbia Housing.
- q. Payments/Benefits received from the Medicare Prescription discount card or the transitional assistance program.

Columbia Housing will not provide exclusions from income in addition to those already provided for by HUD.

11.3 DEDUCTIONS FROM ANNUAL INCOME

The following deductions will be made from annual income:

- A. \$480 for each dependent;
- B. \$400 for any elderly family or disabled family;
- C. For any family that is not an elderly or disabled family but has a member (other than the head or spouse) who is a person with a disability, disability assistance expenses in excess of 3% of annual income. This allowance may not exceed the employment income received by family members who are 18 years of age or older as a result of the assistance to the person with disabilities.
- D. For any elderly or disabled family:
 - 1. That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income;
 - 2. That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses;

3. That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the total of these expenses less 3% of annual income.

E. Childcare expenses that are reasonable based on local market rates.

12.0 VERIFICATION

Columbia Housing will verify information related to waiting list preferences, eligibility, admission and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations; full time student status of family members 18 years of age and older; Social Security numbers; and citizenship/eligible non-citizen status. Age and relationship will only be verified in those instances where needed in order to make a determination of level and type of housing assistance.

12.1 ACCEPTABLE METHODS OF VERIFICATION

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. (Or for citizenship documentation such as listed below will be required.) Verification of these items will include photocopies of the Social Security cards and other documents presented by the family, the INS SAVE approval code, and forms signed by the family.

Other information will be verified by third-party verification. This type of verification includes written documentation with forms sent directly to and received directly by a source, not passed through the hands of the family. This verification may also be direct contact with the source, in person or by telephone. It may also be a report generated by a request from Columbia Housing or automatically by another government agency, i.e. the Social Security Administration. Verification forms and reports received will be contained in the applicant/tenant file. Oral third-party documentation will include the same information as if the documentation had been written, i.e. name date of contact, amount received, etc.

When third-party verification cannot be obtained, Columbia Housing will accept documentation received from the applicant/tenant. Hand-carried documentation will be accepted if Columbia Housing has been unable to obtain third-party verification in a 4-week period. Photocopies of the documents provided by the family will be maintained in the file.

When neither third-party verification nor hand-carried verification can be obtained, Columbia Housing will accept a notarized statement signed by the head, spouse or co-head. Such documents will be maintained in the file.

Use of HUD's system will also be mandatorily used as third-party verification.

The use of lower level verification methods will place a higher burden on CH to justify its use of that particular verification method rather than a higher level of verification methods. CH may be required to provide documentation for each case.

12.2 TYPES OF VERIFICATION

The following chart provides a verification hierarchy and verification techniques to be followed in the administration of any qualifying events, such as initial move-in, annual reexaminations and interim reexaminations.

If the Income Report does not contain any employment and income information for the family, the PHA should attempt the next lower level verification technique, as noted in the below chart.

Level	Verification Technique	Ranking
6	Upfront Income (UIV) using HUD's Enterprise system (not available for income verification of applicants)	Highest (Mandatory)
5	Upfront Income Verification (UIV) using non-HUD system	Highest (Optional)
4	Written Third-Party Verification	High (Mandatory to supplement EIV-reported income sources and when EIV has income sources; Mandatory when tenant disputed EIV-reported employment and income information and is unable to provide acceptable documentation to support dispute).
3	Written Third-Party Verification Form	Medium-Low (Mandatory if written third-party verification documents are not available or rejected by the PHA; and when the applicant or tenant is unable to provide acceptable documentation)
2	Oral Third-Party Verification	Low (Mandatory if written third-party verification is

		not available)
1	Tenant Declaration	Low (Use as a last resort when unable to obtain any type of third-party verification)

Note: This verification hierarchy applies to income determinations for applicants and participants; however, EIV is not available for verifying income of applicants.

Verification Technique Definitions

Third-Party Verification Techniques

Upfront Verification (UIV) (Level 6/5): The verification of income before or during a family reexamination, through an independent source that systematically and uniformly maintains income information in computerized form for a number of individuals.

It should be noted that the EIV system is available to all PHAs as a UIV technique. PI-IAs are encouraged to continue using other non-HUD UIV tools, such as The Work Number (an automated verification system) and state government databases, to validate tenant-reported income.

Oral Third-Party Verification (Level 2): Independent verification of information by contacting the individual income/expense source(s), as identified through the UIV technique or identified by the family, via telephone or in-person visit. PI-IA staff should document in the tenant file, the date and time of the telephone call (or visit to the third-party), the name of the person contacted and telephone number, along with the confirmed information.

This verification method is commonly used in the event that the independent source does not respond to the PHA's faxed, mailed, or e-mailed request for information in a reasonable time frame i.e., ten (10) business days.

Non Third-Party Verification Technique

Tenant Declaration (Level 1): The tenant submits an affidavit or notarized statement of reported income and/or expenses to the PHA. This verification method should be used as a last resort when the PHA has not been successful in obtaining information via all other verification techniques. When the PHA relies on tenant declaration, the PHA must document in the tenant file why third-party verification was not available.

Exceptions to Third-Party Verification Requirements

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HUD is aware that in some situations, third-party verification is not available for a variety of reasons. Oftentimes, the PHA may have made numerous attempts to obtain the required verifications with no success or it may not be cost effective to obtain third-party verification of income, assets or expenses when the impact on total tenant payment is minimal. In these cases, the PHA is **required to document in the family files the reason(s) why third-party verification was not available.**

The exception to third-party verification can be found at CFR §960.259(c)(1) and §982.516(a)(2), which states, "The PHA must obtain and document in the family file third-party verification of the following factors, **or must document in the file why third-party verification was not available.**"

Third-party Verification Requirements

In accordance with 24 CFR §960.259(c)(1) and 24 CFR §982.516(a)(2) for the Public Housing and HCV programs, respectively, the PHA must obtain and document in the tenant file third-party verification of the following factors, or must document in the tenant file why third-party verification was not available; (i) reported family annual income; (ii) the value of assets; (iii) expenses related to reductions from annual income; and (iv) other factors that affect the determination of adjusted income.

Columbia Housing will verify, via third-party verification, housing cost included in Athletic Scholarships of students attending institutions of higher education, which will be used in the determination of family adjusted income.

Written Third-party Verification (Level 4): An original or authentic document generated by a third-party source dated with or within the 60-day period preceding the reexamination or PHA request date. Such documentation may be in the possession of the tenant (or applicant) and is commonly referred to as tenant-provided documents. It is the Department's position that such tenant-provided documents are written third-party verification since these documents originated from a third-party source. The PHA may, at its discretion, reject any tenant-provided documents and follow up directly with the source to obtain necessary verification of information.

Examples of acceptable tenant-provided documentation (generated by a third-party source) include, but are not limited to: pay stubs, payroll summary reports, employed notice/letter of hire/termination, SSA benefit verification letter, bank statements, child support payment stubs, welfare benefit letters and/or printouts and unemployment monetary benefit notices. Current acceptable tenant-provided documents must be used for income and rent determinations.

The PHA is required to obtain at a minimum, two current and consecutive pay stubs for determining annual income from wages. For new income sources, or when two pay stubs are not available, the PHA should project income based on the information from a traditional third-party verification form or the best available information.

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Note: Documents older than 60 days (from the PHA interview/determination or request date) is acceptable for confirming effective dates of income.

Written Third-party Verification Form (Level 3): Also known as traditional third-party verification is a standardized form to collect information from a third-party source. The third-party completes the form by hand (in writing or typeset). The PHA will send the form directly to the third-party source by mail, fax, or email.

It is the Department's position that the administrative burden and risk associated with use of the traditional third-party verification form may be reduced by PHAs relying on acceptable documents that are generated by a third-party, but in the possession of and provided by the tenant (or applicant). Many documents in the possession of the tenant are derived from third-party sources (i.e., employers, federal, state and/or local agencies, banks, etc.)

The Department recognizes that third-party verification request forms sent to third-party sources often are not returned. In other instances, the person who completes the verification form may provide incomplete information; or some tenants may collude with the third-party source to provide false information; or the tenant intercepts the form and provides false information.

The Department requires PHAs to rely on documents that originate from a third-party source's computerized system and/or database, as this process reduces the likelihood of incorrect or falsified information being provided on the third-party verification request form. The use of acceptable tenant provided documents, which originate from a third-party source, will improve the integrity of information used to determine a family's income and rent and ultimately reduce improper subsidy payments. This verification process will also streamline the income verification process.

12.3 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS

The citizenship/eligible non-citizen status of each family member regardless of age must be determined.

Prior to being admitted, or at the first reexamination, all citizens and nationals will be required to sign a declaration under penalty of perjury. They will be required to show proof of their status by such means as a Social Security card, birth certificate, military ID, or military DD 214 Form.

Prior to being admitted or at the first reexamination, all eligible non-citizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

Prior to being admitted or at the first reexamination, all eligible non-citizens must sign a declaration of their status and a verification consent form and provide their original INS

documentation. Columbia Housing will make a copy of the individual's INS documentation and place the copy in the file. Columbia Housing will also verify their status through the INS SAVE system. If the INS SAVE system cannot confirm eligibility, Columbia Housing will mail information to the INS in order that a manual check can be made of INS records.

Family members who do not claim to be citizens, nationals, or eligible non-citizens must be listed on a statement of ineligible members and the list must be signed by the head of the household.

Non-citizen students on student visas, though in the country legally, are not eligible to be admitted to public housing.

Any family member who does not choose to declare their status must be listed on the statement of ineligible members.

If no family member is determined to be eligible under this section, the family's eligibility will be denied.

The family's assistance will not be denied, delayed, reduced, or terminated because of a delay in the process of determining eligible status under this section, except to the extent that the delay is caused by the family.

If Columbia Housing determines that a family member has knowingly permitted an ineligible non-citizen (other than any ineligible non-citizens listed on the lease) to permanently reside in their public housing unit, the family will be evicted. Such family will not be eligible to be readmitted to public housing for a period of 24 months from the date of eviction or termination.

12.4 VERIFICATION OF SOCIAL SECURITY NUMBERS

Prior to admission, each family member must provide verification of their Social Security number. New family members must provide this verification prior to being added to the lease.

The best verification of the Social Security number is the original Social Security card. If the card is not available, Columbia Housing will accept letters from the Social Security Agency that establishes and states the number. Documentation from other governmental agencies will also be accepted that establishes and states the number. Driver's licenses, military IDs, passports or other official documents that establish and state the number are also acceptable.

If an individual states that they do not have a Social Security number, they will be required to obtain a Social Security number.

If a member of an applicant family indicates they have a Social Security number, the family cannot be housed until verification is provided.

If a member of a tenant family indicates they have a Social Security number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to ninety (90) days to provide the verification. If the individual is at least 62 years of age, they will be required to provide a Social Security number. If the individual fails to provide the verification within the time allowed, the family will be evicted.

12.5 TIMING OF VERIFICATION

Verification information must be dated within 120 days for both public housing and Section 8 for certification or reexamination. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes. For issuance of a new voucher, verification cannot exceed 60 days.

When an interim reexamination is conducted, Columbia Housing will only verify and update those elements reported to have changed. However, Columbia Housing has the discretion to verify and update all information related to family circumstances and level of assistance.

12.6 FREQUENCY OF OBTAINING VERIFICATION

For each family member, citizenship/eligible non-citizen status will be verified only once. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular reexamination. Prior to a new member joining the family, their citizenship/eligible non-citizen status will be verified.

For each family member, verification of Social Security number will be obtained only once. This verification will be accomplished prior to admission.

13.0 DETERMINATION OF TOTAL TENANT PAYMENT AND TENANT RENT

13.1 FAMILY CHOICE

At admission and each year in preparation for their annual reexamination, each family is given the choice of having their rent determined under the formula method or having their rent set at the flat rent amount.

- A. Families who opt for the flat rent may be asked to go through the income reexamination process annually.
- B. Families who opt for the flat rent may request to have a reexamination and return to the formula-based method at any time for any of the following reasons:

1. The family's income has decreased.
2. The family's circumstances have changed increasing their expenses for childcare, medical care, etc.
3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.

13.2 THE FORMULA METHOD

The total tenant payment is equal to the highest of:

- A. 10% of monthly income; or
- B. 30% of adjusted monthly income.

The family will pay the greater of the total tenant payment or the minimum rent of \$50.

In the case of a family who has qualified for the income exclusion at Section 11.2(H) (1 l), upon the expiration of the 12-month period described in that section, an additional rent benefit accrues to the family. If the family member's employment continues, then for the 12-month period following the 12-month period of disallowance, the resulting rent increase will be capped at 50 percent of the rent increase the family would have otherwise received.

13.3 MINIMUM RENT

Columbia Housing has set the minimum rent at \$50. However, if the family requests a hardship exemption, Columbia Housing will immediately suspend the minimum rent for the family until Columbia Housing can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

- A. A hardship exists in the following circumstances:
 1. When the family has lost eligibility for or is waiting an eligibility determination for a Federal, State or local assistance program;
 2. When the family would be evicted as a result of the imposition of the minimum rent requirement;
 3. When the income of the family has decreased because of changed circumstances, including loss of employment;
 4. When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
 5. When a death has occurred in the family.

- B. No hardship. If Columbia Housing determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.
- C. Temporary hardship. If Columbia Housing reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. Columbia Housing will offer a repayment agreement in accordance with the Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period, Columbia Housing will not evict the family for nonpayment of the amount of tenant rent owed for the suspension period.
- D. Long-term hardship. If Columbia Housing determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
- E. Appeals. The family may use the grievance procedure to appeal Columbia Housing's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

13.4 THE FLAT RENT

Flat rents are currently set at 80% of the Fair Market rents per HUD guidance. Columbia Housing has set a flat rent for each public housing unit. The amount of the flat rent will be re-evaluated annually, and adjustments applied. Affected families will be given a 30-day notice of any rent change. Adjustments are applied on the anniversary date for each affected family (for more information on flat rents, see Section 15.3).

Columbia Housing will post the flat rents at each of the developments and at the central office. The flat rents are incorporated in this policy upon approval by the Board of Commissioners.

Currently, Columbia Housing does not have any ceiling rents. If in the future we decide to use ceiling rents, Columbia Housing will post the ceiling rents at each of the developments and at the central office. The ceiling rents are incorporated in this policy upon approval by the Board of Commissioners.

13.5 RENT FOR FAMILIES UNDER THE NONCITIZEN RULE

A mixed family will receive full continuation of assistance if all of the following conditions are met:

- A. The family was receiving assistance on June 19, 1995;
- B. The family was granted continuation of assistance before November 29, 1996;

- C. The family's head or spouse has eligible immigration status; and
- D. The family does not include any person who does not have eligible status.

If a mixed family qualifies for prorated assistance but decides not to accept it, or if the family has no eligible members, the family may be eligible for temporary deferral of termination of assistance to permit the family additional time for the orderly transition of some or all of its members to locate other affordable housing. Under this provision, the family receives full assistance. If assistance is granted under this provision prior to November 29, 1996, it may last no longer than three (3) years. If granted after that date, the maximum period of time for assistance under the provision is eighteen (18) months. Columbia Housing will grant each family a period of six (6) months to find suitable affordable housing. If the family cannot find suitable affordable housing, Columbia Housing will provide additional search periods up to the maximum time allowable.

Suitable housing means housing that is not substandard and is of appropriate size for the family. Affordable housing means that it can be rented for an amount not exceeding the amount the family pays for rent, plus utilities plus 25%.

The family's assistance is based on the established flat rent applicable to the unit to calculate rent for mixed families. When the total tenant payment (TTP) exceeds the flat rent, the mixed family's payment will be equivalent to the TTP.

13.6 UTILITY ALLOWANCE

Columbia Housing shall establish a utility allowance for all check-metered utilities and for all tenant-paid utilities. The allowance will be based on a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary and healthful environment. In setting the allowance, Columbia Housing will review the actual consumption of tenant families as well as changes made or anticipated due to modernization (weatherization efforts, installation of energy-efficient appliances, etc.). Allowances will be evaluated at least annually as well as any time utility rate changes by 10% or more since the last revision to the allowances.

A reasonable Utility Allowance will be included in the flat rents, per HUD guidance PIH-2015-13 (HA).

The utility allowance will be subtracted from the family's formula rent to determine the amount of the Tenant Rent. The Tenant Rent is the amount the family owes each month to Columbia Housing. The amount of the utility allowance is then still available to the family to pay the cost of their utilities. Any utility cost above the allowance is the responsibility of the tenant. Any savings resulting from utility costs below the amount of the allowance belongs to the tenant.

For Columbia Housing paid utilities, Columbia Housing will monitor the utility consumption of each household. Any consumption in excess of the allowance established by Columbia Housing will be billed to the tenant monthly.

Utility allowance revisions based on rate changes shall be effective retroactively to the first day of the month following the month in which the last rate change took place. Revisions based on changes in consumption or other reasons shall become effective at each family's rent change or the next annual reexamination.

Families with high utility costs are encouraged to contact Columbia Housing for an energy analysis. The analysis may identify problems with the dwelling unit that, once corrected, will reduce energy costs. The analysis can also assist the family in identifying ways they can reduce their costs.

Requests for relief from surcharges for excess consumption of Columbia. Columbia Housing purchased utilities or from payment of utility supplier billings in excess of the utility allowance for tenant paid utility costs may be granted by Columbia Housing on reasonable grounds. Requests shall be granted to families that include an elderly member or a member with disabilities. Requests by the family shall be submitted under the Reasonable Accommodation Policy. Families shall be advised of their right to individual relief at admission to public housing and at time of utility allowance changes.

13.7 PAYING RENT

Rent and other charges are due and payable on the first day of the month. Rent can be paid at the following locations:

- A. Central Office during regular business hours;
- B. CH drop box at Central Office (24 hrs. a day);
- C. By mail;
- D. By credit card; or
- E. Online at www.CHsc.org

Reasonable accommodations for this requirement will be made for persons with disabilities. As a safety measure, no cash shall be accepted as a rent payment

If the rent is not paid by the tenth of the month, a Late Notice will be issued to the tenant. Five (5%) of the net rent will be assessed to the tenant as a late charge, unless fee is waived by the manager. If rent is paid by a personal check and the check is returned for insufficient funds, this shall be considered a non-payment of rent and will incur the late charge plus processing costs, as posted by Columbia Housing.

See Addendum A for the full Rent Collections Policy and Procedure.

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14.0 CONTINUED OCCUPANCY AND COMMUNITY SERVICE

14.1 GENERAL

In order to be eligible for continued occupancy, each adult family member must either: (1) contribute eight (8) hours per month of community service (not including political activities) in the Midlands or (2) participate in an economic self-sufficiency program unless they are exempt from this requirement. All activities must be approved by the CH.

14.2 EXEMPTIONS

The following adult family members of tenant families are exempt from this requirement:

- A. Age 62 years or older.
- B. Blind or disabled (as defined under 216 or 1614 of the Social Security Act 42 U.S.C. 416; 1382) and who certify that because of this disability they are unable to comply with the service provisions or primary caretakers of such individuals.
- C. Engaged in work activities as defined in section 407 (cl) of the Social Security Act 42 U.S.C. 607 (d), specified below:
 - 1. Unsubsidized employment
 - 2. Subsidized private-sector employment
 - 3. Subsidized public-sector employment
 - 4. Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available.
 - 5. On-the-job-training
 - 6. Job-search and job-readiness assistance
 - 7. Community service programs
 - 8. Vocational educational training (not to exceed 12 months with respect to any individual)
 - 9. Job-skills training directly related to employment
 - 10. Education directly related to employment in the case of a recipient who has not received a high school diploma or an equivalency
 - 11. Satisfactory attendance at secondary school or in a course of study leading to a certificate of a general equivalence, in case of a recipient who has not completed secondary school or received such a certificate

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12. The provision of childcare services to an individual who is participating in a community service program.
- F. Individuals exempted from work activities by a state program funded under the Social Security Act or by any other state welfare program.
- G. Individuals receiving assistance who have not been found to be in noncompliance with state or TANF requirements.

14.3 NOTIFICATION OF THE REQUIREMENT

Initial notice of the community service requirement will be provided to all applicants at the time of application. Columbia Housing shall identify all adult family members who are apparently not exempt from the community service requirement.

Columbia Housing shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. Columbia Housing shall verify such claims.

The notification will advise families that their community service obligation will begin upon the effective date of their first annual reexamination on or after 10/1/99. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. It will also advise them that failure to comply with the community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

14.4 VOLUNTEER OPPORTUNITIES

Community service includes performing work or duties for the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self-sufficiency program is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

Columbia Housing will coordinate with social service agencies, local schools and the Residents Executive Council (REC) in identifying a list of volunteer community service positions.

14.5 THE PROCESS

At the first annual reexamination on or after October 1, 1999, and each annual reexamination thereafter, Columbia Housing will do the following:

- A. Provide a list of volunteer opportunities to the family members.
- B. Provide information about obtaining suitable volunteer positions. Effective May 1, 2016, Tenants who are required to perform community service, may self-certify their compliance by providing volunteer experiences as required. However, any tenants who self-certify may be subject to periodic validation.
- C. Assign family members to a case manager who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The case manager will track the family member's progress routinely and will meet with the family member as needed to best encourage compliance.
- D. Thirty (30) days before the family's next lease anniversary date, the case manager and the manager will advise Columbia Housing whether each applicable adult family member is in compliance with the community service requirement.

14.6 NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

Columbia Housing will notify any family non-compliant of the following:

- A. The family member(s) has been determined to be in noncompliance;
- B. That the determination is subject to the grievance procedure; and
- C. That, unless the family member(s) enter into an agreement to comply, the lease will not be renewed or will be terminated;

14.7 OPPORTUNITY FOR CURE

Columbia Housing will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement, and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns goes toward the current commitment until the current year's commitment is made.

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The case manager will assist the family member in identifying volunteer opportunities and will track compliance on a monthly basis.

If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program or falls behind in their obligation under the agreement to perform community service by more than three (3) hours after three (3) months, Columbia Housing shall take action to terminate the lease.

14.8 GUESTS

Columbia Housing's public housing residents cannot provide accommodations for boarders, lodgers or house guests for more than two weeks.

15.0 RECERTIFICATIONS

At least annually, Columbia Housing will conduct a reexamination of family income and circumstances. The results of the reexamination determine (1) the rent the family will pay and (2) whether the family is housed in the correct unit size.

15.1 GENERAL

Columbia Housing will send a notification letter to the family letting them know that it is time for their annual reexamination, giving them the option of selecting either the flat rent or formula method and scheduling an appointment to meet with the manager. The letter includes a list of information families need to bring in preparation for the interview. The letter includes instructions permitting the family to reschedule the interview if necessary. The letter tells families who may need to make alternate arrangements due to a disability that they may contact staff to request an accommodation of their needs. At the appointment, the family will make their decision regarding which rent method they will choose.

During the appointment, Columbia Housing will determine whether family composition may require a transfer to a different bedroom size unit, and if so, the family's name will be placed on the transfer list.

15.2 MISSED APPOINTMENTS

If the family fails to respond to the letter and fails to attend the interview, a second letter will be mailed. The second letter will advise of a new time and date for the interview, allowing for the same considerations for rescheduling and accommodation as above. The letter will also advise that failure by the family to attend the second scheduled interview will result in Columbia Housing taking eviction actions against the family.

15.3 FLAT RENTS

The annual letter to flat rent payers regarding the reexamination process will state the following:

- A. Each year at the time of the annual reexamination, the family has the option of selecting a flat rent amount in lieu of completing the reexamination process and having their rent based on the formula amount.
- B. The amount of the flat rent.
- C. A fact sheet about formula rents that explains the types of income counted, the most common types of income excluded and the categories allowances that can be deducted from income.
- D. Families who opt for the flat rent will be required to go through the income reexamination process every three years. However, the manager has the right to reexamine residents, who pay flat rents, when he/she deems necessary.
- E. Families who opt for the flat rent may request to have a reexamination and return to the formula-based method at any time for any of the following reasons:
 - 1. The family's income has decreased.
 - 2. The family's circumstances have changed increasing their expenses for childcare, medical care, etc.
 - 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.
- F. The dates upon which Columbia Housing expects to review the amount of the flat rent, the approximate rent increase the family could expect and the approximate date upon which a future rent increase could become effective.
- G. The name and phone number of an individual to call to get additional information or counseling concerning flat rents.
- H. A certification for the family to sign accepting or declining the flat rent.

At re-examination, Columbia Housing will offer the choice between a flat or a formula rent. The opportunity to select the flat rent is available at re-examination and at exhaustion of Earned Income Disallowances (EID), if flat rent was in effect at the time just prior to EID. At the appointment, Columbia Housing may assist the family in identifying the rent method that would be most advantageous for the family.

15.4 **THE FORMULA METHOD**

During the interview, the family will provide all information regarding income, assets, expenses and other information necessary to determine the family's share of rent. The family will sign the Authorization & Privacy Act form and other consent forms that later will be mailed to the sources that will verify the family circumstances.

Upon receipt of verification, Columbia Housing will determine the family's annual income and will calculate their rent as follows.

The total tenant payment is equal to the highest of:

- A. 10% of monthly income;
- B. 30% of adjusted monthly income; or
- C. The welfare rent.

The family will pay the greater of the total tenant payment or the minimum rent of \$50 but never more than the ceiling rent.

15.5 EFFECTIVE DATE OF RENT CHNGES FOR ANNUAL RE-EXAMINATIONS

The new rent will generally be effective upon the anniversary date with thirty (30) day notice of any rent increase to the family.

If the rent determination is delayed due to a reason beyond the control of the family, then any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary date.

Interim reductions become effective the first of the month following that which the reduction in income occurs.

15.6 INTERIM RE-EXAMINATIONS

During an interim re-examination, all information affected by the changes being reported will be reviewed and verified.

Families are required to report the following changes to Columbia Housing between regular re-examinations. If the family's rent is being determined under the formula method, these changes will trigger an interim re-examination. The family shall report these changes within ten (10) days of their occurrence.

- A. A member has been added to the family through birth or adoption or court- awarded custody.
- B. A household member is leaving or has left the family unit.

In order to add a household member other than through birth or adoption (including a live-in aide), the family must request that the new member be added to the lease. Before adding the new member to the lease, the individual must complete an application form stating their

income, assets, and all other information required of an applicant. The individual must provide their Social Security number and must verify their citizenship/eligible immigrant status. (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family.) The new family member will go through the screening process similar to the process for applicants. Columbia Housing will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, if the family's rent is being determined under the formula method, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with paragraph below 15.8.

Families are not required to, but may at any time, request an interim re-examination based on a decrease in income, an increase in allowable expenses, or other changes in family circumstances. Upon such request, Columbia Housing will take timely action to process the interim reexamination and recalculate the tenant's rent.

15.7 SPECIAL REEXAMINATIONS/HARDSHIPS

If a family's income is too unstable to project for twelve (12) months, including families that temporarily have no income (0 renters) or have a temporary decrease in income, Columbia Housing may schedule special reexaminations every thirty (30) days until the income stabilizes and an annual income can be determined.

15.8 EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM OR SPECIAL RE-EXAMINATIONS

Unless there is a delay in the re-examination processing caused by the family, any rent increase will be effective the first of the second month after the month in which the family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim reexamination should have been completed.

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

15.9 OVER-INCOME TENANTS

Pursuant to the HOTMA law signed on July 29, 2016, income limits were established for families to continue occupancy in public housing units. The law imposed stipulations on families whose income exceeded 120% of the Area Median Income (AMI) for two consecutive years. As required by regulations, CH will terminate the family's tenancy within six months of the second determination or change monthly rent equal to greater of the applicable Fair Market Rent or the amount of monthly subsidy for the unit inclusive of operating and capital funds.

15.10 IMPOSITION OF THE OVER-INCOME LIMIT

The over-income regulation will be imposed by analysis during interim and annual re-examination period, documenting the family's status, notification of the regulation and statutory requirements, re-evaluation of the income at the subsequent interim or annual re-examination exactly one year from the initial observation and imposition of the policy if the family is deemed to be over-income for 12 consecutive months at the end of its two year grace period.

15.11 DETERMINATION OF OVER-INCOME LIMITS

The over-income limits will be calculated as 50% of AMI for the family. Annually, CH will calculate the limit by multiplying the VLI by 2.4. The final over-income limit will be compared to the family's adjusted income and with the exiting range of income eligibility based on family size. CH will update the over-income limits in the ACOP no later than 60 days after HUD publishes the new limits each year.

15.12 RESTRICTIONS AND SPECIAL CIRCUMSTANCES TO EVICTING FAMILIES BASED ON INCOME

CH will not violate laws fair housing, civil rights, Section 504 of the Rehabilitation Act, Fair Housing, and Title II of the American Disabilities Act. CH will make reasonable accommodations for persons with disabilities who are identified as over-income. Families with disabled household members will be exempt from the over-income mandatory requirement.

Unless required by the local law, families may not be evicted or tenancy terminated solely because the family is over the income limit for public housing if the family has a valid contract for participation in an FSS Program. CH will not evict a family for being over the income limit for public housing if the family currently receives the earned income disallowance provided by 42 U.S.C. 1437a(d) and 24 CFR 960.255.

15.13 TWO-YEAR TIME FRAME

Over-income families must be documented and tracked. Upon identification at each annual or interim re-examination that a family exceeds the applicable over-income limit, the tenant

file must be documented and income evaluated at the next subsequent re-examination. The two year grace period will be triggered on the HUD 500-58 by Annual and Interim Re-examinations. CH will document the family's file at each re-examination the status of their over-income designation and notify families of their status.

15.14 NOTIFICATION OF REQUIREMENTS ESTABLISHED IN SECTION 103 OF HOTMA

All notifications provided to the family must be conducive in a manner that accommodates any disability or special language modifications. The initial notification will inform families that their income exceeded the over-income limit for one year and if their income continues to exceed for the next 12 consecutive months, they will be subjected to termination of lease or higher rent. CH will conduct a second interim or annual re-examination 12 months from the date of the initial re-examination that identified the family as over-income. The family will be notified 30 days prior to the rent start date of the initial re-exam that they are over-income. If the family continues to be over-income at the second re-examination, they will be notified 30 days prior to the rent start date of that re-examination period. An additional notice will be sent to tenants six months prior to the end of their two year grace period reminding them of their status. Families with 24 consecutive months over being over-income will be terminated or required to pay higher rents according to the policy. Notification of the termination or higher rent will be sent 30 days prior to the end of the 24 month grade period.

15.15 TERMINATIONS AND HIGHER RENT PAYMENTS

CH will terminate the over-income requirement if the family is certified as no longer over-income during the second interim or annual re-examination. Upon this determination, the family is no longer subjected to these provisions. If a previously over-income family is determined as being over-income during a later interim or annual re-examination, the family is entitled to a new two year grace period. If the family remains over-income twelve months after the consecutive over-income determination, the family's lease will be terminated or they will be required to pay higher rent based upon (1) the applicable Fair Market Rent or (2) the amount of monthly subsidy for the unit inclusive of operating and capital fund.

16.0 UNIT TRANSFERS

16.1 OBJECTIVES OF THE TRANSFER POLICY

The objectives of the Transfer Policy include the following:

- A. To address emergency situations.
- B. To address medical and health situations.
- C. To fully utilize available housing resources while avoiding overcrowding or overhousing by ensuring that each family occupies the appropriate size unit.

- D. To facilitate relocation when required for modernization or other management purposes.
- E. To facilitate relocation of families with inadequate housing accommodations.
- F. To provide an incentive for families to assist in meeting Columbia Housing's deconcentration goal.
- G. To eliminate vacancy loss and other expense due to unnecessary transfers.
- H. To move a non-handicapped family from handicapped housing.

16.2 PRIORITIES OF TRANSFERS

Priority 1: Emergency transfers. These transfers are necessary when conditions pose an immediate threat to the life, health or safety of a family or one of its members. Such situations may involve defects of the unit or the building in which it is located, a hate crime, the safety of witnesses to a crime or a law enforcement matter particular to the neighborhood.

Priority 2: Immediate administrative transfers. These transfers are necessary in order to permit family needing accessible features to move to a unit with such a feature or to enable modernization work to proceed.

Priority 3: Regular administrative transfers. These transfers are made to offer incentives to families willing to help meet certain Columbia Housing occupancy goals, to connect occupancy standards where the unit size is inappropriate for the size and composition of the family, to allow for non-emergency but medically advisable transfers, and other transfers approved by Columbia Housing when a transfer is the only or best way of solving a serious problem.

Priority 4: Other administrative transfers. These transfers offer incentives to families through the category-based waiting list and the homeownership program.

16.3 DOCUMENTATION

When the transfer is at the request of the family, the family may be required to provide third-party verification of the need for the transfer.

16.4 SCATTERED SITE TRANSFERS

Transfer requests will be encouraged and approved for families who live in a development where their income category (below or above 30% of area median) predominates and wish to move to a development where their income category does not predominate.

Families living in multifamily developments have the opportunity to transfer to scattered-site housing. Families approved for such transfers will meet the following eligibility criteria:

- A. Have been a tenant for one-year;
- B. The family is current in the payment of all charges owed to Columbia Housing and has not paid late rent for at least one year;
- C. The family passes a current housekeeping inspection and does not have any record of housekeeping problems during the last year;
- D. The family has not materially violated the lease over the past two years by disturbing the peaceful enjoyment of their neighbors, by engaging in criminal or drug related activity or by threatening the health or safety of tenants or Columbia Housing staff;
- E. The tenant must demonstrate that they have the ability to pay the required utilities and maintain the lawn care and snow removal of the home, through some form of regular and documented income.

16.5 PROCESSING TRANSFERS

Transfers on the waiting list will be sorted by the above priorities and within each priority by date and time.

Transfers in Priorities 1 and 2 will be housed ahead of any other families, including those on the applicant waiting list. Transfers in Priority 1 will be housed ahead of transfers in Priority 2 and Priority 3.

Transfers in Priority 4 will be housed along with applicants for admission.

Upon offer and acceptance of a unit, the family will execute all lease up documents and pay any rent and/or security deposit within two (2) days of being informed the unit is ready to rent. The family will be allowed three (3) days to complete a transfer. The family will be responsible for paying rent at the old unit as well as the new unit if the family fails to move in the three-day period. The prorated rent and other money, including any additional security deposit remaining, must be paid the first of the following month or as determined by the manager.

The following is the policy for the rejection of an offer to transfer:

- A. If the family rejects with good cause any unit offered, they will not lose their place on the transfer waiting list.
- B. If the transfer is being made at the request of Columbia Housing and the family rejects two offers without good cause, Columbia Housing will take action to

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terminate their tenancy. If the reason for the transfer is that the current unit is too small to meet Columbia Housing's optimum occupancy standards, the family may request in writing to stay in the unit without being transferred so long as their occupancy will not exceed two people per living/sleeping room.

- C. If the transfer is being made at the family's request and the rejected offer provides deconcentration incentives, the family will maintain their place on the transfer list and will not otherwise be penalized.
- D. If the transfer is being made at the family's request, the family may, without good cause and without penalty, turn down one offer that does not include deconcentration incentives. After turning down a second such offer without good cause, the family's name will be removed from the transfer list.

16.6 COST OF THE FAMILY'S MOVE

The cost of the transfer generally will be borne by the family in the following circumstances:

- A. When the transfer is made at the request of the family or by others on behalf of the family (i.e. by the police);
- B. When the transfer is needed to move the family to an appropriately sized unit, either larger or smaller;
- C. When the transfer is necessitated because a family with disabilities needs the accessible unit into which the transferring family moved (The family without disabilities signed a statement to this effect prior to accepting the accessible unit); or
- D. When the transfer is needed because action or inaction by the family caused the unit to be unsafe or uninhabitable.

The cost of the transfer will be borne by Columbia Housing in the following circumstances:

- A. When the transfer is needed in order to carry out rehabilitation activities; or
- B. When action or inaction by Columbia Housing has caused the unit to be unsafe or inhabitable.

The responsibility for moving costs in other circumstances will be determined on a case by case basis.

16.7 TENANTS IN GOOD STANDING

When the transfer is at the request of the family, it will not be approved unless the family is in good standing with Columbia Housing. This means the family must be in compliance

with their lease, current in all payments to Columbia Housing and must pass a housekeeping inspection.

16.8 TRANSFER REQUESTS

A tenant may request a transfer at any time by completing a transfer request form. In considering the request, Columbia Housing may request a meeting with the tenant to better understand the need for transfer and to explore possible alternatives. Columbia Housing will review the request in a timely manner and if a meeting is desired, it shall contact the tenant within ten (10) business days of receipt of the request to schedule a meeting.

Columbia Housing will grant or deny the transfer request in writing within ten (10) business days of receiving the request or holding the meeting, whichever is later.

If the transfer is approved, the family's name will be added to the transfer waiting list.

If the transfer is denied, the denial letter will advise the family of their right to utilize the grievance procedure.

16.9 RIGHT OF COLUMBIA HOUSING TRANSFER POLICY

The provisions listed above are to be used as a guide to ensure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a tenant to transfer or refuse to transfer.

17.0 INSPECTIONS

An authorized representative of Columbia Housing and the head of household will inspect the premises prior to commencement of occupancy. A written statement of the condition of the premises will be made, all equipment will be provided, and the statement will be signed by both parties with a copy retained in Columbia Housing file and a copy given to the head of household. An authorized Columbia Housing representative will inspect the premises at the time the resident vacates and will furnish a statement of any charges to be made provided the resident turns in the proper notice under State law. The resident's security deposit can be used to offset against any Columbia Housing damages to the unit.

17.1 MOVE-IN INSPECTIONS

Columbia Housing and the head of household will inspect the unit prior to signing the lease. Both parties will sign a written statement of the condition of the unit. A copy of the signed inspection will be given to the family and the original will be placed in the tenant's file.

17.2 ANNUAL INSPECTIONS

Columbia Housing will inspect each public housing unit annually to ensure that each unit meets Columbia Housing's housing standards. Work orders will be submitted and completed to correct any deficiencies.

17.3 PREVENTATIVE MAINTENANCE INSPECTIONS

This is generally conducted along with the annual inspection. This inspection is intended to keep items in good repair. It checks weatherization; checks the condition of the smoke detectors, water heaters, furnaces, automatic thermostats and water temperatures; checks for leaks; and provides an opportunity to change furnace filters and provide other minor servicing that extends the life of the unit and its equipment.

Columbia Housing will also perform routine pest control treatments.

17.4 SPECIAL INSPECTIONS

A special inspection may be scheduled to enable HUD or others to inspect a sample of the housing stock maintained by Columbia Housing.

17.5 HOUSEKEEPING INSPECTIONS

Generally, at the time of the Housing Quality and Standard Inspection (HQS), or at other times as necessary, Columbia Housing will conduct a housekeeping inspection to ensure the family is maintaining the unit in a safe and sanitary condition.

17.6 NOTICE OF INSPECTION

For inspections defined as annual inspections, preventative maintenance inspections, special inspections, Housing Quality and Standard Inspections and housekeeping inspections, Columbia Housing will give the tenant at least two (2) days written notice.

17.7 EMERGENCY INSPECTIONS

If any employee and/or agent of Columbia Housing has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice. The person(s) that enters the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

17.8 PRE-MOVE-OUT INSPECTIONS

When a tenant gives notice that they intend to move, Columbia Housing will schedule a pre-move-out inspection upon request by the family. The inspection allows Columbia Housing to help the family identify any problems which, if left uncorrected, could lead to vacate charges. This inspection is a courtesy to the family and has been found to be helpful

both in reducing costs to the family and in enabling Columbia Housing to ready units more quickly for the future occupants.

17.9 MOVE-OUT INSPECTIONS

Columbia Housing conducts the move-out inspection after the tenant vacates to assess the condition of the unit and determine responsibility for any needed repairs. When possible, the tenant is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

18.0 PET POLICY

18.1 EXCLUSIONS

This policy does not apply to animals that are used to assist persons with disabilities. Assistive animals are allowed in all public housing facilities with no restrictions other than those imposed on all tenants to maintain their units and associated facilities in a decent, safe, sanitary manner and to refrain from disturbing their neighbors.

18.2 PETS IN ELDERLY HOUSING

Columbia Housing will allow for pet ownership in projects or buildings. However, due to limited structural and ground accommodations, ownership of dogs is prohibited in the following buildings:

- A. Marion Street High-Rise
- B. Arrington Manor
- C. Oak-Read High-Rise
- D. Rosewood Hills Senior High-Rise

18.3 APPROVAL

Residents must have the prior approval of the community manager before moving a pet into their unit. Residents must request approval on Columbia Housing's Authorization for Pet Ownership Form that must be fully completed before Columbia Housing will approve the request. A photo of the pet will be taken and placed in the resident's file. The manager will schedule the resident to attend a Pet Ownership orientation class. Failure to attend the class will result in immediate denial for pet ownership.

If the request is denied, the resident may request an appeal through the Director of Public Housing.

18.4 TYPES AND NUMBER OF PETS

Columbia Housing will allow only certain domesticated dogs, cats, birds and fish in units. No animal may exceed 20 pounds in weight. All dogs and cats must be neutered.

The following animals will not be allowed in public housing units:

- rodents
- snakes, reptiles and arachnids
- pigs, rabbits and ferrets
- wild fowl
- the following breeds of dog: Chow, Pit Bull, Doberman Pincher and German Shepherd
- non-domesticated dogs or any that are part wolf
- any animal outlawed by the City of Columbia
- any animal deemed to be potentially harmful to the health or safety of others, including attack or fight trained dogs;

Only one (1) pet per unit is allowed, except for fish and visiting pets (see Section 18.10).

18.5 INOCULATIONS

In order to be registered, pets must be appropriately inoculated against rabies and other conditions prescribed by local ordinances. The resident must provide proper documentation from a veterinarian of the procedure. If the pet is not old enough to be neutered, the resident must provide proper documentation from a veterinarian indicating when the procedure will be available.

18.6 PET DEPOSIT

A pet deposit of \$150 is required at the time of registering a pet. Columbia Housing will waive the pet deposit for fish tanks under 20 gallons. This fee must be paid in full when the pet is acquired. The deposit is refundable when the pet or the family vacates the unit, less any amounts owed due to damage beyond normal wear and tear.

18.7 FINANCIAL OBLIGATION OF RESIDENTS

Any resident who owns or keeps a pet in their dwelling unit will be required to pay for any damages caused by the pet. Also, any pet-related insect infestation in the pet owner's unit will be the financial responsibility of the pet owner. Columbia Housing reserves the right to exterminate the unit and charge the resident.

18.8 NUISANCE OR THREAT TO HEALTH SAFETY

The pet and its living quarters must be maintained in a manner to prevent odors and any other unsanitary conditions in the owner's unit and surrounding areas. Pet owners must clean up after their pets and are responsible for disposing of pet waste.

Repeated substantiated complaints by neighbors or Columbia Housing personnel regarding pets disturbing the peace of neighbors through noise, odor, animal waste or other nuisances will result in the owner having to remove the pet or CH will evict the resident.

18.9 DESIGNATION OF PET AREAS

Pets must be kept in the owner's apartment or on a leash at all times when outside (no outdoor cages may be constructed). Tenants will not be allowed to keep pets outside on chains or in cages. Pets will be allowed only in designated areas on the grounds of the projects. Pet owners must clean up after their pets and are responsible for disposing of pet waste.

18.10 VISITING PETS

When Columbia Housing approves a guest in a public housing unit, the guest may be allowed to bring a pet, only for the duration of the stay, if approved in advance by CH. Pets must meet the size and type criteria outlined above. Tenants who have visiting pets must abide by the conditions of this policy regarding health, sanitation, nuisances and peaceful enjoyment of others. Visiting pets must be contained. Any violation of this policy will require the tenant to remove the visiting pet.

18.11 REMOVAL OF PETS

Columbia Housing, or an appropriate community authority, shall require the removal of any pet from a project if the pet's conduct or condition is determined to be a nuisance or threat to the health or safety of other occupants of the project or of other persons in the community where the project is located. Failure to remove pet will be grounds for eviction.

If a pet dies, the resident may not dispose of the pet's body on CH property, including burial or by using dumpsters. Residents may call the City of Columbia for assistance in the removal of pet.

18.12 INSPECTIONS

Columbia Housing reserves the right to inspect any unit with pets at any time.

18.13 EFFECTIVE DATE

This policy is effective July 1, 2019.

19.0 REPAYMENT AGREEMENTS

When a resident owes Columbia Housing back charges (to include those under a hardship situation) and is unable to pay the balance by the due date, the resident may request that Columbia Housing allow them to enter into a Repayment Agreement. Columbia Housing

has the sole discretion of whether to accept such an agreement. All Repayment Agreements must assure that the full payment is made within a period not to exceed twelve (12) months unless approved by the manager. All Repayment Agreements must be in writing and signed by both parties. Failure to comply with the Repayment Agreement terms may subject the Resident to eviction procedures.

20.0 TERMINATION

20.1 TERMINATION BY TENANT

The tenant may terminate the lease at any time upon submitting a 30-day written notice. If the tenant vacates prior to the end of the thirty (30) days, they will be responsible for rent through the end of the notice period or until the unit is re-rented, whichever occurs first.

20.2 TERMINATION BY COLUMBIA HOUSING

Columbia Housing after 10/1/2000 will not renew the lease of any family that is not in compliance with the Community Service Requirement or an approved agreement to cure. If they do not voluntarily leave the property, eviction proceedings will begin.

An incident or incidents of actual or threatened domestic violence, elating violence, sexual assault or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and shall not be good cause for terminating the assistance, tenancy or occupancy rights of the victim of such violence.

Columbia Housing will terminate the lease for serious or repeated violations of material lease terms. Such violations include but are not limited to the following:

- A. Nonpayment of rent or other charges;
- B. A history of late rental payments;
- C. Failure to provide timely and accurate information regarding family composition, Social Security numbers, income circumstances or other information related to eligibility or rent;
- D. Failure to allow inspection of the unit;
- E. Failure to maintain the unit in a safe and sanitary manner;
- F. Assignment or subletting of the premises;
- G. Use of the premises for purposes other than as a dwelling unit (other than for Columbia Housing approved resident businesses);
- H. Destruction of property;

- I. Acts of destruction, defacement or removal of any part of the premises or failure to cause guests to refrain from such acts;
- J. Any criminal activity or drug-related criminal activity on or off the premises (even in the absence of conviction or arrest). Columbia Housing has a "one-strike" or "zero tolerance" policy with respect to violations in this area;
- K. Non-compliance with Non-Citizen Rule requirements;
- L. Permitting persons not on the lease to reside in the unit more than fourteen (14) days each year without the prior written approval of Columbia Housing; and
- M. Columbia Housing will take immediate action to evict any household that includes an individual who is subject to a lifetime registration requirement under a State sex offender registration program.
- N. Failure to comply with Community Service Requirements.
- O. Threatens a CH employee or another resident.
- P. Other good cause.

20.3 **ABANDONMENT**

Columbia Housing will consider a unit to be abandoned when a resident has both fallen behind in rent AND utilities are no longer on.

When a unit has been abandoned, a Columbia Housing representative may enter the unit and remove any abandoned property. If the value of the removed property is less than \$500, it will be disposed of. If the value of the removed property is greater than \$500, then Columbia Housing will file for a "Declaration of Abandonment" with the local magistrate. If the magistrate concurs, the removed property will be disposed of.

In all cases, the manager has the right to sell the property.

Any money raised by the sale of the property goes to cover money owed by the family to Columbia Housing, such as back rent and the cost of storing and selling the goods. If there is any money left over (i.e., security deposit) and the family's forwarding address is known Columbia Housing will mail it to the family. If the family's address is not known, Columbia Housing will keep it for the resident for no more than 5 years. If it is not claimed within that time, Columbia Housing will submit the funds to South Carolina Department of Revenue.

Within 30 days of learning of abandonment, Columbia Housing will either return the deposit or provide a statement of why the deposit is being kept.

20.4 **RETURN OF SECURITY DEPOSIT**

After a family moves out, Columbia Housing will return the security deposit within thirty (30) days or give the family a written statement of why all or part of the security deposit is being kept. The rental unit must be restored to the same conditions as when the family moved in, except for normal wear and tear. Deposits will not be used to cover normal wear and tear or damage that existed when the family moved in.

Columbia Housing will pay interest on security deposits.

Columbia Housing will be considered in compliance with the above if the required payment, statement, or both, are deposited in the U.S. mail with first class postage paid within thirty (30) days.

20.5 BALANCES OWED COLUMBIA HOUSING

If a resident leaves with a balance owed to Columbia Housing and it is not paid by November of the calendar year, the South Carolina Department of Revenue will be notified.

20.6 Death of Head of Household

When notified of a deceased tenant or when the Deceased Tenant Report identifies a tenant, CH will be required to take the following actions:

- A. Public Housing Program: Conduct a home visit to determine if anyone is residing in the unit.

If there are unauthorized persons (including a live-in aide) in the unit of a deceased single member household, the CH will pursue judicial intervention to have them lawfully removed from the unit.

21.0 GRIEVANCES AND EXCEPTIONS

21.1 GRIEVANCES

All decisions can be appealed by following Columbia Housing's standard grievance procedures, which can be found in Columbia Housing's Annual Plan. A copy of this Annual Plan is available in all CH management offices.

21.2 EXCEPTIONS

Exceptions to the admission's policy or procedure will only be made by Columbia Housing's Executive Director. His/her judgment will be based upon relative evidence, produced by the applicant, that adherence to a certain policy or procedure would result in an emergency or hardship either to the applicant and/or a member of the family. Such exceptions will not be based on race, color, national origin, religion, sex, familial status

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(including children under the age of 18 living with parents or legal custodians, pregnant women and people securing custody of children under the age of 18), and disability.

22.0 VIOLENCE AGAINST WOMEN ACT (VAWA)

Columbia Housing Board of Commissioners has adopted a Violence Against Women Policy to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 and more generally to establish CH's policies and procedures regarding domestic violence, dating violence, sexual assault, and stalking, as defined by HUD.

The Policy shall be applicable to the administration by CH of all federally subsidized public housing, Section 8 rental assistance under the United States Housing Act of 1937 (42 U.S.C. § 1437 et seq.) and all other programs funded by the U.S. Department of Housing and Urban Development. Notwithstanding its title, the policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

GLOSSARY

50058 Form: The HUD form that housing authorities are required to complete for each assisted household in public housing to record information used in the certification and re-certification process and, at the option of Columbia Housing, for interim reexaminations.

1937 Housing Act: The United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) (24 CFR 5.100)

Adjusted Annual Income: The amount of household income, after deductions for specified allowances, on which tenant rent is based. (24 CFR 5.611)

Adult: A household member who is 18 years or older or who is the head of the household, or spouse, or co-head.

Allowances: Amounts deducted from the household's annual income in determining adjusted annual income (the income amount used in the rent calculation). Allowances are given for elderly families, dependents, medical expenses for elderly families, disability expenses, and childcare expenses for children under 13 years of age. Other allowance can be given at the discretion of Columbia Housing.

Annual Contributions Contract (ACC): The written contract between HUD and Columbia Housing under which HUD agrees to provide funding for a program under the 1937 Act, and Columbia Housing agrees to comply with HUD requirements for the program. (24 CFR 5.403)

Annual Income: All amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- C. Are not specifically excluded from annual income.

Annual Income also includes amounts derived (during the 12-month period) from assets to which any member of the family has access. (1937 Housing Act; 24 CFR 5.609)

Applicant (applicant family): A person or family that has applied for admission to a program but is not yet a participant in the program. (24 CFR 5.403)

As-Paid States: States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs. Currently, the four as-paid States are New Hampshire, New York, Oregon, and Vermont.

Assets: The value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles are not counted as assets. (Also see 11net family assets.11)

Asset Income: Income received from assets held by family members. If assets total more than \$5,000, income from the assets is 11 imputed¹¹¹ and the greater of actual asset income and imputed asset income is counted in annual income. (See "imputed asset income" below.)

Ceiling Rent: Maximum rent allowed for some units in public housing projects.

Certification: The examination of a household's income, expenses, and family composition to determine the family's eligibility for program participation and to calculate the family's share of rent.

Child: For purposes of citizenship regulations, a member of the family other than the family head or spouse who is under 18 years of age. (24 CFR 5.504(b))

Child Care Expenses: Amounts anticipated to be paid out of pocket by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable (based on market rates) charges for childcare. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income. (24 CFR 5.603(d))

Citizen: A citizen or national of the United States. (24 CFR 5.504(b))

Consent Form: Any consent form approved by HUD to be signed by assistance applicants and participants for the purpose of obtaining income information from employers and SWICAs, return information from the Social Security Administration, and return information for unearned income from the Internal Revenue Service. The consent forms may authorize the collection of other information from assistance applicants or participant to determine eligibility or level of benefits. (24 CFR 5.214)

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim, based on: length of relationship; type of relationship; frequency of interaction between the persons.

Decent, Safe, and Sanitary: Housing is decent, safe, and sanitary if it satisfies the applicable housing quality standards.

Department: The Department of Housing and Urban Development. (24 CFR 5.100)

Dependent: A member of the family (except foster children and foster adults), other than the family head or spouse, who is under 18 years of age or is a person with a disability or is a full-time student. (24 CFR 5.603(d)) Children who are subject to a joint custody agreement but live with one parent at least 51% of the time will be considered members of the household. "51% of the time" is defined as 183 days of the year and do not have to run consecutively. When both parents are on the Waiting List and both are trying to claim the child, the parent whose address is listed in the school records will be allowed to claim the school-age child as a dependent.

Dependent Allowance: An amount, equal to \$480 multiplied by the number of dependents, that is deducted from the household's annual income in determining adjusted annual income.

Disability Assistance Expenses: Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source. (24 CFR 5.603(d))

Disability Assistance Expense Allowance: In determining adjusted annual income, the amount of disability assistance expenses deducted from annual income for families with a disabled household member.

Disabled Family: A family whose head, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides. (24 CFR 5.403(b)) (Also see "person with disabilities.")

Disabled Person: See "person with disabilities."

Displaced Family: A family in which each member, or whose sole member, is a person displaced by governmental action (such as urban renewal), or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. (24 CFR 5.403(b))

Displaced Person: A person displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. (1937 Act)

Disallowance: Exclusion from annual income.

Domestic Violence: Felony or misdemeanor crimes of violence committed by: current or former spouse of the victim, or person similarly situated to a spouse of the victim; person with whom victim shares a child in common; person who cohabits with or has cohabited with victim; or any other person.

Drug-Related Criminal Activity: Drug trafficking or the illegal use, or possession for personal use, of a controlled substance as defined in Section 102 of the Controlled Substances Act (21 u.s.c.802)

Elderly Family: A family whose head, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides. (24 CFR 5.403)

Elderly Family Allowance: For elderly families, an allowance of \$400 is deducted from the household's annual income in determining adjusted annual income.

Elderly Person: A person who is at least 62 years of age. (1937 Housing Act)

Extremely low-income families: Those families whose incomes do not exceed 30% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families.

Fair Housing Act: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 et seq.). (24 CFR 5.100)

Family includes but is not limited to:

Admissions and Continued Occupancy Plan_Revised and Board Approved on 02.20.2020

- A. A family with or without children;
- B. An elderly family;
- C. A near-elderly family;
- D. A disabled family;
- E. A displaced family;
- F. The remaining member of a tenant family; and
- G. A single person who is not an elderly or displaced person, a person with disabilities, or the remaining member of a tenant family. (24 CFR 5.403)

Family Members: All members of the household other than live-in aides, foster children, and foster adults. All family members permanently reside in the unit, though they may be temporarily absent. All family members are listed on the lease.

Family Self-Sufficiency Program (FSS Program): The program established by Columbia Housing to promote self-sufficiency among participating families, including the coordination of supportive services. (24 CFR 984.103(b))

Flat Rent: A rent amount the family may choose to pay in lieu of having their rent determined under the formula method. The flat rent is established by Columbia Housing set at the lesser of the market value for the unit or the cost to operate the unit. Families selecting the flat rent option have their income evaluated once every three years, rather than annually.

Formula Method: A means of calculating a family's rent based on 10% of their monthly income, 30% of their adjusted monthly income, the welfare rent or the minimum rent. Under the formula method, rents may be capped by a ceiling rent. Under this method, the family's income is evaluated at least annually.

Full-Time Student: A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree. (24 CFR 5.603(d))

Head of Household: The adult member of the family who is the head of the household for purposes of determining income eligibility and rent. (24 CFR 5.504(b))

Household Members: All members of the household including members of the family, live-in aides, foster children, and foster adults. All household members are listed on the lease, and no one other than household members are listed on the lease.

Housing Assistance Plan: A housing plan that is submitted by a unit of general local government and approved by HUD as being acceptable under the standards of 24 CFR 570.

Imputed Income: For households with net family assets of more than \$5,000, the amount calculated by multiplying net family assets by a HUD-specified percentage. If imputed income is more than actual income from assets, the imputed amount is used as income from assets in determining annual income.

Independent Student: A student that is 24 years old by December 31 of the award year for which aid is sought; an orphan or ward of the court through the age of 18; a veteran of the U.S. Armed Forces; has legal dependents other than a spouse (for example, dependent children or parent); a graduate or professional student; or married.

In-Kind Payments: Contributions other than cash made to the family or to a family member in exchange for services provided or for the general support of the family (e.g., groceries provided on a weekly basis, babysitting provided on a regular basis).

Interim (examination): A reexamination of a family income, expenses, and household composition conducted between the regular annual recertification's when a change in a household's circumstances warrants such a reexamination.

Live-In Aide: A person who resides with one or more elderly persons, near-elderly persons, or persons with disabilities and who:

- A. Is determined to be essential to the care and well-being of the persons;
- B. Is not obligated for the support of the persons; and
- C. Would not be living in the unit except to provide the necessary supportive services.
(24 CFR 5.403(b))

Low-Income Families: Those families whose incomes do not exceed 80% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80% of the median for the area on the basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low family incomes. (1937Act)

Medical Expenses: Medical expenses (of all family members of an elderly or disabled family), including medical insurance premiums, that are anticipated during the period for which annual income is computed and that are not covered by insurance. (24 CFR 5.603(d)). These expenses include but are not limited to: prescription and non-prescription drugs, costs for doctors, dentists, therapists, medical facilities, care for a service animals and transportation for medical purposes.

Mixed Family: A family whose members include those with citizenship or eligible immigration status and those without citizenship or eligible immigration status. (24 CFR 5.504(b))

Monthly Adjusted Income: One twelfth of adjusted income. (24 CFR 5.603(d))

Monthly Income: One twelfth of annual income. (24 CFR 5.603(d))

National: A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession. (24 CFR 5.504(b))

Near-Elderly Family: A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides. (24 CFR 5.403(b))

Net Family Assets:

- A. Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- B. In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income.
- C. In determining net family assets, housing authorities or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received thereof. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms. (24 CFR 5.603(d))

Non-Citizen: A person who is neither a citizen nor national of the United States. (24 CFR 5.504(b))

Occupancy Standards: The standards that Columbia Housing establishes for determining the appropriate number of bedrooms needed to house families of different sizes or composition.

Person with Disabilities: A person who:

- A. Has a disability as defined in Section 223 of the Social Security Act, which states:
“Inability to engage in any substantial, gainful activity by reason of any medically determinable physical or mental impairment that can be expected to result in death or that has lasted or can be expected to last for a continuous period of not less than 12 months, or

In the case of an individual who attained the age of 55 and is blind and unable by reason of such blindness to engage in substantial, gainful activity requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time. “

- B. Is determined, pursuant to regulations issued by the Secretary, to have a physical, mental, or emotional impairment that:
 - 1. Is expected to be of long-continued and indefinite duration;
 - 2. Substantially impedes his or her ability to live independently; and
 - 3. Is of such a nature that such ability could be improved by more suitable housing conditions, or
- C. Has a developmental disability as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act, which states:

"Severe chronic disability that:

- 1. Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- 2. Is manifested before the person attains age 22;
- 3. Is likely to continue indefinitely;
- 4. Results in substantial functional limitation in three or more of the following areas of major life activity: (1) self-care, (2) receptive and responsive language, (3) learning, (4) mobility, (5) self-direction, (6) capacity for independent living, and (7) economic self-sufficiency; and
- 5. Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated."

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome. (1937 Act)

No individual shall be considered to be a person with disabilities for purposes of eligibility solely based on any drug or alcohol dependence.

Proration of Assistance: The reduction in a family's housing assistance payment to reflect the proportion of family members in a mixed family who are eligible for assistance. (24 CFR5.520)

Public Housing Agency (PHA): Any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of low-income housing under the 1937 Housing Act. (24 CFR 5.100)

Recertification: The annual re-examination of a family's income, expenses and composition to determine the family's rent.

Remaining Member of a Tenant Family: A member of the family listed on the lease who continues to live in the public housing dwelling after all other family members have left. (Handbook 7565.1 REV-2, 3-5b.)

Self-Declaration: A type of verification statement by the tenant as to the amount and source of income, expenses or family composition. Self-declaration is acceptable verification only when third-party verification or documentation cannot be obtained.

Shelter Allowance: That portion of a welfare benefit (e.g., TANF) that the welfare agency designates to be used for rent and utilities.

Single Person: Someone living alone or intending to live alone who does not qualify as an elderly family, a person with disabilities, a displaced person or the remaining member of a tenant family. (Public Housing: Handbook 7465 .1 REV-2, 3-5)

Stalking: To follow, pursue, place under surveillance, or repeatedly commit acts with intent to kill, injure, harass or intimidate. To place a person in reasonable fear of death, serious bodily injury, or emotional harm to that person, their immediate family member(s), or spouse or intimate partner.

State Wage Information Collection Agency (SWICA): The State agency receiving quarterly wage reports from employers in the State or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information. (24 CFR 5.214)

Temporary Assistance to Needy Families (TANF): The program that replaced the Assistance to Families with Dependent Children (AFDC) that provides financial assistance to needy families who meet program eligibility criteria. Benefits are limited to a specified time period.

Tenant: The person or family renting or occupying an assisted dwelling unit. (24 CFR 5.504(b))

Tenant Rent: The amount payable monthly by the family as rent to Columbia Housing. Where all utilities (except telephone) and other essential housing services are supplied by Columbia Housing or owner, tenant rent equals total tenant payment. Where some or all utilities (except telephone) and other essential housing services are supplied by Columbia Housing and the cost thereof is not included in the amount paid as rent, tenant rent equals total tenant payment less the utility allowance. (24 CFR 5.603(d))

Third-party (verification): Written or oral confirmation of a family's income, expenses, or household composition provided by a source outside the household.

Total Tenant Payment (TTP):

- A. Total tenant payment for families whose initial lease is effective on or after August 1, 1982:
 - 1. Total tenant payment is the amount calculated under Section 3(a)(1) of the 1937 Act which is the higher of:
 - a. 30% of the family's monthly adjusted income;
 - b. 10% of the family's monthly income; or
 - c. If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments is also designated.

If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under section 3(a)(1) shall be the amount resulting from one application of the percentage.
 - 2. Total tenant payment for families residing in public housing does not include charges for excess utility consumption or other miscellaneous charges.
- B. Total tenant payment for families residing in public housing whose initial lease was effective before August 1, 1982: Paragraphs (b) and (c) of 24 CFR 913.107, as it existed immediately before November 18, 1996), will continue to govern the total tenant payment of families, under a public housing program, whose initial lease was effective before August 1, 1982.

Utility Allowance: If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made by Columbia Housing of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy conservative household of modest circumstances consistent with the requirements of a safe, sanitary and healthful living environment. (24 CFR 5.603)

Utility Reimbursement: The amount, if any, by which the utility allowance for the unit, if applicable, exceeds the total tenant payment for the family occupying the unit. (24 CFR 5.603)

Very Low-Income Families: Low-income families whose incomes do not exceed 50% of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50% of the median for the areas on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes. Such ceilings shall be established in consultation with the Secretary of Agriculture for any rural area, as defined in Section 520 of the Housing Act of 1949, taking into account the subsidy characteristics and types of programs to which such ceilings apply. (1937 Act)

Veteran: A person who served in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable.

Welfare Assistance: Welfare or other payments to families or individuals, based on need, that are made under programs funded by Federal, State or local governments. (24 CFR 5.603(d))

Welfare Rent: In "as-paid" welfare programs, the amount of the welfare benefit designated for shelter and utilities.

Working Family: Families whose head of household or spouse are bona fide employed for a period of ninety (90) days.

For the purpose of the site-based waiting list, the head of household or spouse are bona fide employed for a period of one (1) year.

ACRONYMS

ACC	Annual Contributions Contract
CFR	Code of Federal Regulations
FSS	Family Self Sufficiency (program)
HCDA	Housing and Community Development Act
HQS	Housing Quality Standards
HUD	Department of Housing and Urban Development
INS	(U.S.) Immigration and Naturalization Service
NAHA	(Cranston-Gonzalez) National Affordable Housing Act
NOFA	Notice of Funding Availability
OMB	(U.S.) Office of Management and Budget
PI-IA	Public Housing Agency

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QHWR	Quality Housing and Work Responsibility Act of 1998
SSA	Social Security Administration
TTP	Total Tenant Payment
VAWA	Violence Against Women Act

Appendix I

Income Limits and Deconcentration Worksheet

Development Name	Number of Units Under ACC	Number of Units Occupied	Number of Occupied Units by Very Poor Families	% Occupied by Very Poor Families

% Very Poor in Census Tract

Target Number

Number needed below 30% of median income

Number needed 30% of median income

Waiting list number of families **Appendix 2**

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

**RESOLUTION 2020-007: Approval of Housing Authority of City of Columbia, SC
Housing Choice Voucher Administrative Plan**

BACKGROUND

The Housing Choice Voucher (HCV) Program Administrative Plan is the governing policy for the HCV program. It outlines Columbia Housing's policies for housing applicants and program participants. The HCV Administrative Plan has been updated to reflect current federal regulations and HUD mandates.

The HCV Administrative Plan was presented to the Housing Authority of the City of Columbia's Executive Committee for review on Thursday, February 13, 2020.

RESOLUTION

WHEREAS, the Housing Authority of the City of Columbia, SC Board of Commissioners hereby approves the Housing Choice Voucher Administrative Plan; and

NOW THEREFORE BE IT FURTHER RESOLVED, by the Board of Commissioners of the Housing Authority of the City of Columbia, SC, that the HCV Administrative Plan presented as an attachment to this Resolution be approved on this 20th day of February 2020.

**The 20th day of February 2020
BOARD OF COMMISSIONERS OF THE
HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC**

BY: _____


Ernest Cromartie, III, CHAIRMAN

Highlights of key policy points in the Administrative Plan presented for Board approval are:

1. **Local Preferences:** We have established three local preferences. Tenants displaced as a result of Public Housing demolition or disposition. Families that are over-housed or under-housed in Public Housing where there are no appropriate size units for the family; and Families displaced by government action.
2. **Waiting List:** We have clarified that when the wait list is open, we will utilize a random lottery to select a predetermined number of registrants that will be placed on the waiting list to keep the program at maximum utilization for the next twelve-month period.
3. **Homeownership:** We have clarified that homeownership subsidy will be paid directly to the mortgage holder and not to the family. We have had several recent delinquent mortgages and a couple have proceeded to foreclosure because homeowners were not passing the subsidy on to the mortgage holder.
4. **Project Based Vouchers:** We have added a Project Based Voucher chapter in the Administrative Plan that correctly addresses all of the HUD requirements for administration of a PBV Program. We have included all the HUD provisions to award PBV contracts to properties owned by Columbia Housing or an affiliate to facilitate the repositioning of our public housing communities.
5. **Overall Updates:** We have incorporated all of the HUD updates since 2016 including the Streamlining Administrative Regulations Notice; the new Portability Notice; and all provisions of the HOTMA legislation including inspections and recertifications.

HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN



Revision Dates

JANUARY 2020

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SECTION 1

STATEMENT OF POLICIES

1.1. General

The United States Housing Act of 1937 (the “Act”) is responsible for the birth of federal housing program initiatives. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing for low income residents.

The Housing and Community Development (HCD) Act of 1974 created a new federally assisted housing program known as the Section 8 Certificate program. The HCD Act represented a significant shift in federal housing strategy from locally owned public housing to privately owned rental housing. The 1987 Housing and Community Development Act authorized a new version of the Section 8 Program and changed the name of the Program to The Housing Choice Voucher (HCV) Program. The Act continues to be amended from time to time, and its requirements, as they apply to the HCV Program, are described in and implemented throughout this Administrative Plan.

All references to a number of days throughout this Plan shall be interpreted as business days and not calendar days.

1.2. Public Housing Authority

The HCV Program(s) are federally funded by the U.S. Department of Housing and Urban Development (HUD) and administered for the County of Richland by the Columbia Housing Authority (CHA). The Columbia Housing Authority is not a federal department or agency. A public housing authority is a governmental or public body, created and authorized by the laws of the State of South Carolina to develop and operate housing programs for low income families and individuals.

The Columbia Housing Authority entered into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. CHA is responsible to ensure compliance with federal laws, regulations and notices and must establish local policies and procedures to clarify federal requirements and to ensure consistency in program operations.

1.3. Jurisdiction

The jurisdiction of The Columbia Housing Authority is the City limits of Columbia, South Carolina. However, under State law, CHA is authorized to administer the Housing Choice Voucher Program throughout Richland County.

1.4. HCV Program Goals

CHA has the following goals for the HCV program:

1. To expand the supply of assisted housing and apply for additional vouchers as they become available.
2. Administer applicable federal and state laws and regulations to achieve high ratings in compliance measurement indicators while maintaining efficiency in program operations to ensure fair and consistent treatment of clients served.

3. Provide decent, safe and and sanitary housing in compliance with program housing quality standards for very low-income families and individuals while ensuring that rents charged by owners are fair, reasonable and affordable.
4. Encourage self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, and other human service needs.
5. Promote Fair Housing and the opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice.
6. Promote a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
7. Promote a market driven housing program that will help qualified low income families be successful in obtaining affordable housing and increase the supply of housing choices for such families.
8. Create positive public awareness and expand the level of family, owner and community support in accomplishing CHA's Mission.
9. Attain and maintain a high level of standards and professionalism in day to day management of all program components.
10. Administer an efficient, high-performing agency through continuous improvement of CHA's support systems and commitment to staff and their development.

1.5. Purpose of the Plan

The purpose of the Administrative Plan is to establish policies for carrying out the Housing Choice Voucher Programs in a manner consistent with HUD requirements and local goals and objectives contained in CHA's Agency Plan. This Plan is a part of CHA's Agency Plan and is available for public review.

This Administrative Plan sets forth CHA's local policies for operation of the HCV Program(s) in the context of federal law and regulations. It is not intended to repeat the federal requirements. All issues related to The HCV Program not addressed in this document are governed by such federal regulations, HUD Handbooks and guidebooks, notices and other applicable laws.

CHA is responsible for complying with all changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations will have precedence.

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: HCV Program
- 24 CFR Part 985: Section 8 Management Assessment Program

The applicable regulations cited and corresponding notices and guidance from HUD make a distinction between mandatory and discretionary policies as follows:

• **Mandatory Policies** are those driven by legislation, regulations, current handbooks, notices and legal opinions.

• **Discretionary Policies** are optional, non-binding guidance, including guidebooks, notices that have expired and recommendations from individual HUD staff.

HUD expects PHA's to comply with and enforce mandatory policies and to make clear optional policies adopted by the PHA. This Administrative Plan is the foundation for those optional policies adopted by CHA. HUD directions require CHA to make policy choices in certain areas of program operations that provide guidance and consistency to staff, program applicants, participants and owners.

Administrative Plan Revisions – CHA will revise this plan as needed to comply with any program changes implemented by HUD throughout the year. These changes shall not constitute a significant modification to the Plan and will not require public notice or comment prior to implementation.

CHA will review the Plan annually and update any local policies or changes in program operations. These changes will be considered a significant modification and will require public notice and comment and will only be done in conjunction with the Annual Agency Plan.

1.6. Nondiscrimination

It is the policy of the Columbia Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing including:

- ✓ Equal Access to Housing in HUD Programs
- ✓ Violence Against Women Reauthorization Act of 2005 (VAWA)
- ✓ Title VI of the Civil Rights Acts of 1964
- ✓ Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- ✓ Executive Order 11063
- ✓ Section 504 of the Rehabilitation Act of 1973
- ✓ The Age Discrimination Act of 1975
- ✓ Title II of the Americans with Disabilities Act (to the extent it applies, otherwise Section 504 and the Fair Housing Amendments govern)

CHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the HCV Programs on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial status, handicap or disability, actual or perceived sexual orientation, gender identity or marital status.

CHA will take steps to assure that families and owners are fully aware of all applicable civil rights laws. CHA will provide, as part of the briefing process, information to HCV applicants about civil rights requirements and the opportunity to rent in a broad range of neighborhoods.

The Housing Assistance Payments (HAP) contract informs owners of the requirements not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

The Columbia Housing Authority shall not:

1. Deny any family the opportunity to apply for housing, nor deny any qualified applicant the opportunity to lease housing suitable to its needs;

2. Provide housing which is different from that provided by others;
3. Subject a person to segregation or disparate treatment;
4. Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
5. Treat a person differently in determining eligibility or other requirements for admission;
6. Steer an applicant or participant toward or away from a particular area based on any of these factors.
7. Deny a person access to the same level of services.

Applicants or participants who believe that they have been subject to unlawful discrimination may notify CHA either orally or in writing. CHA will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO). CHA will make every attempt to remedy any discrimination complaints made against CHA but if unsuccessful, the same information will be provided to complainants.

1.7. Addressing Barriers to Equal Housing Opportunities

CHA ensures that persons with disabilities have full access to CHA programs and services. No individual with disabilities shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination because CHA's facilities are inaccessible to or unusable by persons with disabilities.

1.8. Reasonable Accommodations

An individual with a disability may request a reasonable accommodation at any time during the application process or participation process in the HCV Program. CHA will provide written notification of the right to request a reasonable accommodation, on the intake application, re-certification documents and notices of adverse action by CHA, by including the following language:

"If you have any special needs, you may request a reasonable accommodation."

A "reasonable accommodation" is defined as a change, modification, alteration or adaptation in policy, procedures, practice, program or facility that is necessary for a qualified individual with a disability to have the opportunity to participate in, and benefit from, a program or activity.

Reasonable accommodations shall include, but are not limited to, assistance for persons with disabilities in locating appropriate accessible units, referrals to other community agencies that provide such assistance and intervention with property owners to negotiate permission to make reasonable modifications in accordance with all provisions of the law.

If a participant or applicant indicates that an exception, change or adjustment to a rule, policy, practice or service is needed because of a disability, CHA will treat this indication as a request for a reasonable accommodation and will encourage the family to make that request in writing. CHA staff will work with the requesting party to complete the Reasonable Accommodation form if necessary.

Verification of Disability – To be eligible to request a reasonable accommodation, the requester must first certify (if apparent) or verify (if not apparent) that they are a person with a disability under the civil rights definition for persons with disabilities.

Third party verification will be obtained from a licensed professional competent to make the determination. CHA will not inquire about the nature or extent of any disability but will only request information that is necessary to evaluate the disability related need for the accommodation. No medical records will be accepted or retained in the participant file.

After a request for an accommodation is presented, CHA will respond in writing within 20 business days of receipt of all required documentation. If CHA denies a request for an accommodation because it is not reasonable (it would impose an undue hardship and administrative burden or fundamentally alter the nature of CHA's operations), CHA will advise the family if an alternative accommodation could effectively address the family's disability related need without an undue hardship.

Undue Burden – An undue administrative burden is one that requires a fundamental alteration of the essential functions of CHA (i.e., waiving a family obligation). An undue financial burden is one that when considering the available resources of the agency as a whole, the requested accommodation would pose a severe financial hardship on CHA.

1.9. Hearing or Vision Impairments

At the initial point of contact, CHA will inform each applicant of alternative forms of communication that can be used other than plain language paperwork. To meet the needs of persons with hearing impairments, TTD/TTY communication will be made available through the State of South Carolina relay system. To meet the needs of persons with vision impairments, CHA will explain materials orally or ask that the individual make arrangements for a third-party representative of their choice to receive, interpret and explain materials.

1.10. Physical Accessibility

CHA will comply with all regulations related to physical accessibility including the following:

- PIH 2002-01
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

When issuing a voucher to a family that includes an individual with disabilities, CHA will include a current list of available accessible units known to CHA and will assist the family in locating an available accessible unit if requested to do so.

CHA will advise owners of the requirement to allow the family to make reasonable modifications to units. Applicants and participants will be advised that owners are not required to pay for modifications and their responsibility to return the unit to its original state at the family's expense when the family moves. CHA will refer the family to community agencies that may be able to assist with unit modifications.

1.11. Improving Access for Persons with Limited English Proficiency

CHA will take affirmative steps to communicate with people who need services or information in a language other than English. (LEP persons).

A significant number of LEP persons eligible to be served or likely to be encountered by the HCV Program in Columbia, use Spanish as their primary language. Thus, CHA will assure that bi-lingual (Spanish-English) staff is available to act as interpreters and translators. CHA will provide written translation to Spanish of vital documents and all correspondence that represents compliance requirements or adverse action against the LEP person.

CHA serves very few LEP persons in any language other than Spanish. Therefore, CHA will not include any other language in this LEP Plan. However, to assure access for persons with other language needs, CHA will use alternative ways to articulate in a reasonable manner to assure meaningful access for LEP persons with needs in languages other than Spanish. These alternatives will include the use of community volunteers, family members and friends as interpreters for LEP persons whose primary language is other than Spanish or English.

1.12. Privacy Rights

Applicants and participants, including all adults in their households, are required to sign the HUD 9886 Authorization for Release of Information. This document incorporates the Federal Privacy Act Statement and describes the conditions under which HUD and/or CHA will release family information. CHA will not release other information except as otherwise specifically identified in this Administrative Plan.

All applicant and participant files will be stored in a secure location, which is only accessible by authorized staff. CHA staff will not discuss family information contained in files unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

1.13. Violence against Women Act (VAWA)

The Violence Against Women Reauthorization Act of 2013 (VAWA 2013) expands housing protections for victims of domestic violence, dating violence, sexual assault or stalking. Changes under VAWA 2013 include extending protections to survivors of sexual assault; allowing survivors who remain in the unit to establish eligibility or find new housing when a lease is bifurcated; providing survivors with emergency transfers; and additional notification to applicants and tenants of housing rights under VAWA. While these changes substantially extend VAWA's coverage to include most affordable housing programs, they provide no protection to tenants in private market-rate housing but do apply to tenants with vouchers in private market-housing.

CHA will provide all protection under VAWA 2013 as described below to program participants and family members of program participants who are victims of domestic violence, dating violence, sexual assault or stalking from being evicted or terminated from housing assistance based on acts of such violence against them.

Parties whom VAWA protects – VAWA 2013 expands the housing protections to cover survivors of sexual assault and protects anyone who:

- Is a victim of actual or threatened domestic violence, dating violence, sexual assault

or stalking, or an “affiliated individual” of the victim (spouse, parent, brother, sister, or child of that victim; or an individual to whom that victim stands in loco parentis; or an individual, tenant or lawful occupant living in the victim’s household); and,

- Is living in, or seeking admission to, any of the covered housing programs.

VAWA 2013 eliminates the requirement that the household member be related by blood or marriage to the victim. Therefore, VAWA 2013 protects individuals who simply live in the victim’s household, regardless of whether they are related by marriage or blood to the victim.

Definitions – The new law revises the definition of “domestic violence” to include crimes of violence committed by an intimate partner of the victim or by a person who has cohabitated with the victim as an intimate partner. VAWA 2013 further amends the definition of “stalking” by including a more general definition than had been provided by VAWA 2005. VAWA 2013 defines the terms in the following manner:

Domestic violence includes felony or misdemeanor crimes of violence committed by:

- A current or former spouse or intimate partner of the victim;
- A person with whom the victim shares a child;
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies; or
- Any other person who committed a crime against an adult or youth victim who is protected under the domestic or family violence laws of the jurisdiction.

Dating violence is violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- The existence of such a relationship is determined based on the following factors:
 - Length of the relationship
 - Type of relationship
 - Frequency of interaction between the persons involved in the relationship.

Sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Stalking is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for his or her safety or others; or
- Suffer substantial emotional distress.

Denials of Admissions, Termination of Tenancy or Assistance – An applicant or tenant shall not be denied admission to, denied assistance under, terminated from participation in, or evicted from housing on the basis that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

An incident of actual or threatened domestic violence, dating violence, sexual assault or

stalking will not be construed as a serious or repeated violation of the lease by the victim and will not be good cause for terminating the assistance or tenancy of the victim.

Criminal Activity Directly Related to the Abuse – No person shall be denied assistance, tenancy or occupancy rights to housing solely on the basis of criminal activity, if that activity is directly related to domestic violence, dating violence, sexual assault or stalking engaged in by a household member, guest or any person under the tenant's control, if the tenant or affiliated individual of the tenant is the victim.¹⁴

Actual and Imminent Threat – CHA may terminate assistance to a victim if CHA can demonstrate an actual and imminent threat to other tenants or employees at the property in the event that the tenant is not evicted or terminated from assistance.

An actual and imminent threat shall include a physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm. In determining the existence of an "actual or imminent threat," CHA will consider the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

Termination of a victim's assistance under this provision will occur only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, permitting a participant to move to another location, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat.

Victims Held to Same Standard – For program violations unrelated to the abuse, CHA, will not subject a participant who is a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard than other participants in determining whether to terminate assistance.

Bifurcation – CHA may bifurcate voucher to terminate assistance to any tenant or lawful occupant who engages in criminal acts of violence against an affiliated individual or others. This action may be taken without penalizing the survivor who is also a tenant or lawful participant.

If CHA terminates assistance to a participant because of criminal acts of violence against family members or others, and that individual is the only family member eligible to receive the housing assistance, then any remaining family member will have the opportunity to establish eligibility for the assistance. If no family member can establish such eligibility, then CHA will provide the participant 60 days to find new housing.

Portability – CHA will permit a family with a Housing Choice voucher to move to another jurisdiction if the family has complied with all other obligations of the program and is moving to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence or stalking. CHA will permit the family to move even if the family's lease term has not yet expired.

Court orders – CHA will honor court orders addressing rights of access to or control of

property, including civil protection orders issued to protect the victim, as well as orders addressing the distribution or possession of property among household members in a case.

Certification – CHA will request that an individual certify via the applicable HUD form or other such written documentation as defined in this section. This certification will: (1) state that an applicant or tenant is a victim of domestic violence, dating violence, sexual assault or stalking; (2) state that the incident that is the ground for protection meets the requirements under the statute; and (3) include the name of perpetrator, if the name is known and safe to provide. In lieu of the certification form, the applicant or participant may provide:

- Documentation signed by the victim and a victim service provider, an attorney, a medical professional, or a mental health professional in which the professional attests under penalty of perjury to his or her belief that the victim has experienced an incident of domestic violence, dating violence, sexual assault or stalking that meets the grounds for protection under the statute; or
- A federal, state, tribal, territorial, or local law enforcement, court or administrative record.

Timeline – After CHA has requested certification in writing, an applicant or participant shall have 30 days to respond to the request. If an individual does not provide the documentation within the 30 days, CHA may deny admission or terminate assistance.

Conflicting Certification – In situations where CHA receives documentation with conflicting information, CHA will require an applicant or participant to submit any of the above-mentioned third-party documentation.

Confidentiality – CHA will keep confidential the information an individual provides to certify victim status, including the individual's status as a victim. This information will be entered into a shared database or disclosed to another entity or individual, unless the disclosure is: requested or consented to by the individual in writing; required for use in a termination proceeding to determine whether the incident qualifies as a serious or repeated violation of the lease, good cause to terminate assistance or tenancy, or criminal activity directly relating to domestic violence, dating violence, sexual assault or stalking; or otherwise required by law.

No CHA employee shall access the information regarding domestic violence unless they are specifically and explicitly authorized to access this information because it is necessary for their work.

Notification and Language Access – CHA will provide the applicable HUD notice accompanied by the certification form to applicants and participants: (1) at the time an applicant is denied admission; (2) at the time the individual is admitted; and (3) with any notification of termination of assistance. In addition, the HUD notice must be available in multiple languages and be consistent with HUD guidance concerning language access for individuals with limited- English proficiency.

PHA Plan – CHA will include in its annual plan a description of any activities, services, or

programs being undertaken to assist victims of domestic violence, dating violence, sexual assault or stalking. In addition, CHA will include in its five-year plan a description of any goals, objectives, policies, or programs it uses to serve victims' housing needs.

SECTION 2

ELIGIBILITY FOR ADMISSION

2.1. General

This Chapter defines both HUD and CHA's criteria for admission and denial of admission to the program. The policy of CHA is to strive for objectivity and consistency in applying these criteria to evaluate the eligibility of families who apply for housing assistance. CHA staff will review all information provided by the family carefully and without regard to factors other than those defined in this Chapter. Families will be provided the opportunity to explain their circumstances, to furnish additional information, if needed, and to receive an explanation of the basis for any decision made by the CHA pertaining to their eligibility.

2.2. Eligibility Factors

CHA will accept applications only from families whose head or spouse is at least 18 years of age or an emancipated minor.

To be eligible for participation in the Housing Choice Voucher Program, an applicant must meet the following criteria established by HUD:

- An applicant must be a "family"
- An applicant' annual gross income must be within the applicable Income Limits at the time that the determination of eligibility is rendered by the Housing Authority.
- An applicant must furnish Social Security Numbers for all family members.
- An applicant must furnish declaration of Citizenship or Eligible Immigrant Status and at least one member of the applicant family must be either a U.S. citizen or have eligible immigration status.

2.3. Placement on Waiting List

The Family's initial eligibility for placement on the waiting list will be made in accordance with the eligibility factors identified above. However, eligibility factors will not be verified before the family is placed on the waiting list. Placement on the waiting list will be based solely on the household's certification.

Reasons for denial of placement on the waiting list or denial of admission are addressed in the "Denial or Termination of Assistance" further in this Administrative Plan. These reasons for denial constitute additional admission criteria.

2.4. Family Composition

The applicant must qualify as a family. The term family includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity or marital status:

1. One or more persons sharing residency, whose income and resources are available to meet the family's needs who may not be related by blood, marriage or operation of law, but who will give evidence of a stable relationship which has existed a minimum of one year.

2. Evidence of a stable family relationship may include, but is not limited to, any of the following: birth certificates of the children, joint tax return, prior lease (held jointly or one adult listed as “head” but other adult was included on the lease), joint bank accounts, insurance policies, prior joint credit history, or similar documentation. Evidence used to verify stable relationship would be documented in the family file.
3. A single person family may be: an elderly person; a displaced person; a disabled person; or any other single person.
4. A remaining household member who is a member of an assisted household whose original head/spouse is no longer living in the rental unit. Such remaining household members must have been listed on the most recent HUD 50058 and lease, must be of legal age and must be able to carry out the terms of the lease and family obligations. A live-in aid is not a remaining family member. (A household member for whom a subsidy was not paid because the household member did not have eligible citizenship status will not be considered a remaining household member).

In addition, for categorizing family as defined above, the terms disabled family, elderly family or near elderly family are:

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

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

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

2.5. Children in Foster Care

If a child has been placed in foster care, CHA will verify with the appropriate agency whether and when the child is expected to be returned to the household. Unless the agency confirms that the child has been permanently removed from the home and/or will not return to the home within the next twelve months, the child will be counted as a family member.

2.6. Head of Household

The head of household is the adult member of the household who is designated by the family as head, is wholly or partly responsible for paying the rent, and has the legal capacity to enter into a lease under State/local law. An employed head of household absent from the unit for more than 180 consecutive days due to employment elsewhere will continue to be considered a family member.

2.7. Co-Head

The co-head of the household is any adult individual designated by the household, who is equally responsible for the lease with the Head of Household. A family may have a spouse or co-head, but not both. A co-head never qualifies as a dependent. An employed co-head absent from the unit for more than 180 consecutive days due to employment elsewhere will continue to be considered a family member.

2.8. Live-in Attendants

A Family may include a live-in aide provided that such live-in aide:

- Is a legal adult (age 18 or older),
- Is determined by CHA to be essential to the care and well-being of an elderly person, a near-elderly person, or a person with disabilities,
- Is not obligated for the support of the person(s), and
- Would not be living in the unit except to provide care for the person(s).

The following distinct provisions apply to a live-in aide:

- Income of the live-in aide will not be counted for purposes of determining eligibility or amount of housing assistance.
- Live-in aides are not subject to Non-Citizen Rule requirements.
- Live-in aides are not considered as a remaining member of the participant family and are therefore not entitled to any continued housing assistance if the household member they were aiding no longer participates in the program.

Relatives are not automatically excluded from being live-in aides, but they must meet all of the elements in the live-in aide definition described above.

A Live in Aide may only reside in the unit with the approval of CHA. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or caseworker. The verification provider must certify that a live-in aide is needed for the care of the family member as described above. Verification must include the hours the care will be provided. Within 10 business days from receipt of all verification information, CHA will notify the household of its decision to approve/disapprove the live-in aide.

At any time, CHA will refuse to approve a particular person as a live-in aide or may withdraw such approval if:

- The person commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;
- The person commits drug-related criminal activity or violent criminal activity; or
- The person currently owes rent or other amounts to CHA or to another housing authority in connection with voucher assistance or public housing assistance under the 1937 Act.

2.9. Foster Children and Foster Adults

A foster child is a child that is in the legal guardianship or custody of a state, county, or private adoption of a foster care agency, yet is cared for by foster parents in their own homes under some kind of short-term or long-term arrangement with the custodial agency.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in violation of HQS space standards. The family will not be provided with a larger voucher size due to the presence of foster children or foster adults.

Foster children and foster adults living with an applicant or assisted family are household members but are not family members. The income of foster children/adults is not counted in annual income and foster children/ adults do not qualify for dependent deductions.

2.10. Absent Family Members

An individual who is, or is expected to be absent from the assisted unit for less than 180 consecutive days is considered temporarily absent and continues to be considered a family member.

An individual who is, or is expected to be, absent for 180 days or more is considered permanently absent and no longer a family member. Family members under the following circumstances may still be considered members of the household even if absent for more than 180 days if the family provides verification that the family member is likely to return within the next twelve months.

- A family member who is away at school
- A child placed in foster care
- An employed head or co-head
- Family members confined to an nursing home or institution for medical reasons

2.11. Guests

A guest is a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent. A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.

A family may request an exception to this policy for valid reasons. However, an exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return.

2.12. Split Households Prior to Voucher Issuance

When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, and the new families both claim the same placement on the waiting list, and there is no court determination, CHA will determine the family unit that retains the children as the applicant family. If there are no children, CHA will require the applicants to jointly agree to the continued applicant or solicit a court decision.

Documentation of these factors is the responsibility of the applicant families. If either or both of the families do not provide appropriate documentation, they will be denied continued placement on the waiting list for failure to supply information requested by CHA.

2.13. Multi-generational Families

Families applying for assistance, which consists of two or more generations living together, (such as a mother, and a daughter with her own children), will be treated as a single family unit and will be entitled to only one housing voucher for assistance.

2.14. Joint Custody of Children

Children who are subject to a joint custody agreement but live with one parent at least 51% of the time will be considered members of the household. "51% of the time" is defined as 183 days of the year, which do not have to run consecutively. Legal documentation must be provided for families who claim joint custody.

2.15. Income Limitations

The following income restriction provisions apply to applicants for admission to the Housing Choice Voucher Programs:

- An applicant must be a very low-income family, which is defined as a family whose annual income does not exceed 50% of the area median income.
- Applicants in excess of the very low-income limits but within the low-income limits (80% of the area median income) will only be admitted based on the following criteria:
- A low-income family that is continuously assisted under the 1937 Housing Act. An applicant is continuously assisted if the family has received assistance under any 1937 Housing Act program within 120 days of voucher issuance.
- A low-income family displaced by rental rehabilitation activity under 24CFR part 511.
- A low-income non-purchasing family residing in a project subject to homeownership program under 24CFR 248.173.
- A low-income or moderate-income family that is displaced as a result of a prepayment of a mortgage or voluntary termination of mortgage insurance contracts under 24 CFR 248.165.
- A low-income family that qualifies for voucher assistance as a non-purchasing family residing in a project subject to a resident home ownership program.
- To determine if the family is income-eligible, CHA will compare the Annual Income of the family to the applicable income limit for the family's size.
- Families whose Annual Income exceeds the income limit will be denied admission and offered an informal review.

- Families using portability must be within CHA's applicable income limits at the time of initial lease up in CHA's jurisdiction.
- 75% of all newly admitted applicants must fall within 30% of the area median income.

2.16. Mandatory Social Security Numbers

Families are required to provide verification of Social Security Numbers for all family members age 6 and older prior to admission, if the Social Security Administration has issued them a number. This requirement also applies to persons joining the family after admission to the program. Failure to furnish verification of social security numbers is grounds for denial or termination of assistance.

Persons who have not been issued a Social Security Number must sign a certification that they have never been issued a Social Security Number. Persons who disclose their Social Security Number but cannot provide verification must sign a certification and provide verification within 60 days. Elderly persons must provide verification within 120 days.

2.17. Citizenship/Eligible Immigration Status

In order to receive assistance, a family member must be a U.S. citizen or eligible immigrant. Eligible immigrants are persons who are in one of the immigrant categories as specified by HUD. The status of each member of the family is considered individually before the family's status is defined as follows:

- **Mixed Families** – A family is eligible for assistance as long as at least one member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are called “mixed.” Assistance to such applicant families will be prorated and applicants will be notified accordingly.
- **All members Ineligible** – Applicant families that include no eligible members are not eligible for assistance. Such families will be denied admission.
- **Non-citizen students** – Defined by HUD in the non-citizen regulations and not eligible for assistance.

Applicants are entitled to a hearing for denial of placement on the waiting list or denial of assistance if such denial is based on the immigration status criteria described above.

2.18. Independent Students

CHA will consider a student “Independent” from his or her parents and the parent's income will not be considered when determining student's eligibility if the all criteria below is met.

- The individual is of legal contract age under state law (18 or older).
- The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations as demonstrated on the parents' most recent taxforms.
- The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support even if no assistance is being provided.
- The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education's definition of independent student as follows:

- ✓ The individual is at least 24 years old by December 31st of the award year for which aid is sought.
- ✓ The individual is an orphan or a ward of the court through the age of 18.
- ✓ The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent).
- ✓ The individual is married

2.19. Other Criteria for Admission

CHA will conduct screening including criminal background checks to determine eligibility for admission to the program. CHA will apply the following additional criteria for admission to the program. Violation of any of the following will result in denial of admission.

- The family must not have been terminated from a previous participation in the HCV program.
- The family must not have been evicted from previous residency in public housing.
- No family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
- The family must pay any outstanding debt owed to CHA or another PHA in connection with HCV or public housing assistance under the 1937 Act within 30 working days of CHA notice to repay.
- No member of the family has a documented record of drug related or violent criminal activity.
- No family member may have engaged in or threatened abusive or violent behavior toward HA personnel for three years prior to final eligibility determination.

Persons terminated from previous participation in an HCV program or evicted from other federally assisted housing because of an arrest and/or conviction for drug-related or other violent criminal activity are ineligible for admission to the HVC Program. However, at the sole discretion of CHA, admission to the program may be considered if the applicant can demonstrate successful completion of a rehabilitation program and continued participation in ongoing rehabilitation.

The applicant may not misrepresent the information on which eligibility or tenant rent is established. In addition to denial of admission, CHA will refer the family file/record to the proper authorities for appropriate disposition.

2.20. Screening for Suitability as a Tenant

CHA will not screen the applicant household for family behavior or suitability of tenancy. At or before CHA's approval of the tenancy, CHA will inform the owner that screening and selection for tenancy is the responsibility of the owner.

CHA will encourage owners to screen families based on their tenancy histories, including such factors as:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;

- Drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others; and
- Compliance with other essential conditions of tenancy.

CHA will advise and assist families if they feel that the screening criterion applied by an owner violates any basic Fair Housing Rights of the family. CHA will make referrals to the local Fair Housing Agency and/or the appropriate HUD office.

2.21. Changes in Eligibility Prior to Effective Date of the Contract

Admission to the HCV Program occurs at the time that an initial Housing Assistance Payments contract is executed with an owner for an eligible unit. Prior to that time, a family is considered an applicant. After execution of the HAP contract, a family is considered a participant. Therefore, changes that occur during the period between issuance of a voucher and lease up may affect the family's eligibility.

2.22. Ineligible Families

Families who are determined to be ineligible will be notified in writing of the reason for this determination and given an opportunity to request an informal review (or an informal hearing if they were denied due to non-citizen status) as discussed further in this Administrative Plan.

SECTION 3

APPLYING FOR ADMISSION

3.1. General

The policy of CHA is to ensure that all families who express an interest in housing assistance are given an equal opportunity to apply, and are treated in a fair and consistent manner.

This Chapter describes the policies and procedures for completing an initial application for assistance, placement and denial of placement on the waiting list, and limitations on who may apply. The primary purpose of the intake function is to gather information about the family, but CHA will also utilize this process to provide information to the family so that an accurate and timely decision of eligibility can be made. Applicants will be pulled from the waiting list in accordance with this Plan.

3.2. Opening and Closing the Waiting List

CHA will open the waiting list at periodic intervals as determined based on need to assure that an adequate pool of applications is available to maintain full program utilization and assist the maximum number of families based on available program funding.

When CHA determines that the waiting list should be opened, a notice will be published in a local newspaper of general circulation. The notice will provide information on where and when families may apply for the program. CHA may open the waiting list only for special programs in which case, the notice shall so state and identify the eligibility provisions of the designated special program.

CHA may open the waiting list for a specific time period, may choose to accept applications on certain days and times, may choose to accept applications only electronically or via U.S. Mail. The public notice will specify the time period and the methodology in which applications will be accepted and identify the closure date for acceptance of applications. Under no circumstances will applications be accepted when the waiting list is closed.

3.3. Family Outreach

CHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in CHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

3.4. Local Preference(s)

CHA will use local preferences as detailed below.

CHA will accept applications from local preference applicants even when the waiting list may otherwise be closed. Applicants with local preferences will not be required to complete the on-line registration but will be placed directly on the waiting list. The following local preferences will be applied in order as listed.

1. **Public Housing Demolition/Disposition** – Residents in “good standing” at a CHA public housing community on the date the community was approved by HUD to be disposed or demolished.
2. **Over/Under Housed Families** – Residents in “good standing” at a community in which CHA has an ownership interest who are over-housed or under-housed and no appropriate size housing unit exists in the community in which they reside or in another community within the same housing program.
3. **Tenants Displaced by Government Action** – Tenants displaced by government action within CHA’s jurisdiction including condemnation actions by the City of Columbia or the County of Richland.

3.5. Application Process

CHA will only accept electronic applications via the on-line web-app. CHA will partner with the Richland County Library system and other Community Service partners to assure that all individuals interested in applying for housing assistance have computer access to file electronic applications. CHA will provide assistance for individuals with special needs at its Resident Service computer centers.

The application process will consist of a two-step process: the on-line web-based application and the full application. The on-line application will request only information needed for placement on the waiting list.

Applicants will be placed on the waiting list based solely on the information provided in the electronic application form. The full application will be completed when an applicant is selected from the waiting list.

A random lottery will be completed for all applications received via the on-line application system. Applicants will be ranked in order on the waiting list from lowest to highest lottery number.

3.6. Reporting Changes While on Waiting List

Applicants are required to update their contact information, including current residence, mailing address and phone number on their electronic application. Applicants are also required to respond to requests from CHA to update information on their application and to determine their continued interest in assistance.

3.7. Purging the Waiting List

The waiting list will be updated periodically to ensure that all applicants and applicant information is current and timely. CHA will notify applicants of the need to complete updates electronically or via U.S. mail. Such requests will include a deadline by which the family must respond and will state that failure to respond will result in being removed from the wait list.

The family’s response must be in writing and must comply with the timeframes and other requirements set forth in the update request. If the family fails to respond within the timeframe allotted, the applicant will be removed from the waiting list and will not be reinstated. If the update request is returned as undeliverable, the applicant will also be removed from the waiting list and will not be reinstated.

If an applicant is removed from the waiting list for failure to respond or an undeliverable update request and they contact CHA within thirty days (30 days from the date of withdrawal), the family will automatically be reinstated to their original place on the wait list. After the thirty-day automatic reinstatement timeframe the applicant will have to demonstrate that it was due to CHA's error, or was unable to respond due to a family member's disability, the applicant will be reinstated and resume their original place on the waiting list.

3.8. Selection from the Waiting List

Families will be selected from the waiting list in order based on the preference points and lottery numbers assigned to each application at the time the applications were placed on the waiting list. All applications in the primary pool will be selected prior to any application in the secondary pool.

Completion of final eligibility will be conducted via mail and/or subsequent on-line electronic systems. CHA will mail notification to selected applicants at the address on file of the requirements to complete the final eligibility process. Instructions for completion of the formal application will be provided in the notice including a date by which the formal application must be completed and returned.

If the family does not complete the eligibility packet by the stated deadline, the applicant will be removed from the waiting list and will not be reinstated except for reasons described in 3.7 above. Reasonable accommodations will be made for persons with a disability.

3.9. Release of Information and Verification

Information provided by the applicant will be verified, using the verification procedures found further in this Plan. Family composition, income, allowances and deductions, assets, full-time student status, rent calculation factors, and other pertinent information will be verified. Verifications may not be more than 120 days old at the time of issuance of the Voucher.

All adult members must sign the HUD Form 9886, Release of Information; the declarations and consents related to citizenship/immigration status; and any other documents required by CHA. Applicants will be required to sign specific verification forms for information which is not covered by the HUD form 9886. Failure to sign any consent forms will be cause for denial of the application for failure to provide necessary certifications and release as required by CHA.

If CHA determines that additional information or document(s) are needed, CHA will request the document(s) or information in writing. The family will be given ten (10) days to supply the information. If the information is not supplied in this time period, CHA will provide the family a notification of denial for assistance.

3.10. Completing the Application Process

After the verification process is completed, CHA will make a final determination of eligibility. This decision is based upon information provided by the family, the verification completed by CHA, and the current eligibility criteria in effect. If the family is determined to be eligible, CHA will invite the family to a briefing for the issuance of a voucher and the family's orientation to the program.

If CHA determines that the family is not eligible, CHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review.

3.11. Special Admissions

Certain vouchers may be received or were received from HUD as the result of a special funding for targeted groups of households. CHA will admit these families under a Special Admission procedure. Special admissions families will be admitted outside of the regular waiting list process and they are not required to be on the program waiting list. CHA will maintain separate records of these admissions.

The following are examples of types of program funding that are designated as special admissions:

- Vouchers received for demolition or disposition of a public housing project.
- Vouchers received for multifamily rental housing projects when HUD sells, forecloses or demolishes the project.
- Vouchers received for “opt-out” of FHA insured multi-family projects.
- Moderate Rehabilitation Project-based Section 8 HAP contracts at or near the end of the HAP contract term that convert to tenant-based vouchers.

3.12. Targeted Funding

Special programs have been developed under the Housing Choice Voucher Program to service certain family types or certain family situations. Most of these programs require that CHA partner with a service agency in the community that provides supportive service to the particular family type and include the following:

- Veterans Administrative Supportive Housing (VASH) vouchers.
- Family Unification Program vouchers (FUP).
- Mainstream vouchers.

When HUD grants funding under these programs, families who meet the qualifications of the program and are referred through the partner agency will be placed on a separate waiting list for each special program type based on date of referral from the partner agency. These families will then be selected in order of date from the waiting list when their special program voucher is available.

CHA will continue to receive referrals from partner agencies until all designated vouchers have been utilized. Upon 100% utilization, CHA will request that the partner agencies suspend additional referrals until such time that any of the original designated vouchers are turned over and again become available for issuance to applicants. At that time, CHA will contact the appropriate partner agency and advise them of the availability of the targeted voucher and a referral will be accepted accordingly.

The provisions for targeted funding identified herein apply to any future programs to be so designated by HUD.

3.13. Income Targeting

CHA will monitor progress in meeting the requirement that 75% of all new admissions must be extremely low income (ELI) households throughout the fiscal year. ELI families are defined as households whose incomes do not exceed the higher of the Federal poverty level or 30% of Area Median Income. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Income targeting does not apply to low-income families continuously assisted as provided for under the 1937 Housing Act or to assistance to low income or moderate-income families entitled to preservation assistance under the tenant-based program as a result of a mortgage prepayment or opt-out.

SECTION 4

SUBSIDY STANDARDS

4.1. General

HUD guidelines require that CHA provide the family an oral briefing and provide the family with a briefing packet containing written information about the program. HUD also requires that CHA establish subsidy standards for the determination of family unit size, and that such standards provide for a minimum commitment of subsidy while avoiding overcrowding. The standards used for the unit size selected by the family must be within the minimum unit size requirements of HUD's Housing Quality Standards.

This Chapter explains the subsidy standards, which will be used to determine the voucher size to be issued to families when they are selected from the waiting list, as well as the procedures when a family composition changes, or a family selects a unit size that is different from the size of the voucher.

4.2. Subsidy Standards

The subsidy standards for determining voucher size shall be applied in a manner consistent with Fair Housing guidelines. The standards in this section relate to the number of bedrooms on which subsidy will be paid, not the family's actual living arrangements.

CHA will allocate the voucher size based on one bedroom for each two persons in the household, except in the following circumstances:

- Persons of the opposite sex (other than head/co-head, life-partners and children under the age of 5) will be allocated separate bedrooms.
- Live-in aides will be allocated a separate bedroom but family members of the live-in aide will not be allocated a separate bedroom.
- Single parent and infants age 2 and under will be allocated a one bedroom.
- A pregnant individual with no other children will be allocated a one bedroom.
- Elderly (age 62 or older) and disabled single persons will be allocated a one bedroom.
- All other single persons will be allocated a zero bedroom.

The voucher size issued will generally be based on the following guidelines taking into consideration the subsidy standards described above.

Voucher Size	Minimum Number of Household Members	Maximum Number of Household Members
0	1	1
1	1	3
2	2	6
3	3	8
4	6	10
5	8	12
6	10	14

4.3. Exceptions to Subsidy Standards

CHA shall consider requests for exceptions from the subsidy standards for any of the reasons specified in the regulations: age, sex, health, handicap, relationship or other personal circumstances.

The family must request the exception in writing within 15 days from the date the voucher was issued and must provide sufficient justification for a larger unit size which includes supporting documentation. Requests based on health or disability of family members, or other individual circumstances must be verified by a knowledgeable professional source such as a doctor or medical professional, unless the request for an accommodation is readily apparent. The family must also provide written documentation justifying an additional bedroom at the time of each subsequent annual re-certification.

CHA will notify the family within 15 business days of receiving the family's information of its decision to grant the exception to the subsidy standards. If the request is denied, the notice will inform the family of its right to request a review of the decision.

4.4. Changes in Subsidy Standard

Applicants – Voucher size is determined prior to the briefing by comparing the family composition to CHA subsidy standards. If an applicant requires a change in the voucher size, based on the requirements of the subsidy standards, the above referenced guidelines will apply.

If CHA errs in the bedroom size designation, the family will be issued a new voucher of the appropriate size for the full period allocated for new program admissions. If the family makes a request for an exception to the payment standards and such request is granted, the family shall be issued a new voucher for the time remaining under the initial issuance period.

Participants – All members of the family residing in the unit must be approved by CHA. The family must obtain approval of any additional family member before the new member occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform the PHA within thirty (30) days from the date of the action.

At each regularly scheduled annual recertification, CHA will review the voucher size of the household and adjust the voucher size based on the above referenced guidelines, as applicable.

If a unit does not meet HQS space standards due to an increase in family size, (unit too small), the PHA will issue a new voucher of the appropriate size at the anniversary date of the current lease agreement and assist the family in locating a suitable unit.

4.5. Unit Size Selected

The family may select a different size dwelling unit than that listed on the Voucher but the following criteria shall apply:

Subsidy Limitation: The family unit size as determined under the subsidy standards for a family assisted in the voucher program is based on the adopted payment standards. The payment standard for a family shall be the ***lower of***:

- The payment standard amount for the family unit (voucher) size; or
- The payment standard amount for the unit size rented by the family.

Affordability Limitation – If a family enters into a new lease agreement which requires the Housing Authority to execute a new Housing Assistance Payments (HAP) contract for a dwelling unit in excess of the payment standard as determined above, the total tenant payment cannot exceed 40% of the household's monthly adjusted income. CHA will not approve a lease for a unit that is not affordable pursuant to this 40% limitation.

Utility Allowance: The utility allowance used to calculate the gross rent shall be the ***lower of***:

- The utility allowance amount for the family unit (voucher) size; or
- The utility allowance amount for the unit size rented by the family.

Housing Quality Standards: The standards allow two persons per living/sleeping room and permit maximum occupancy levels (assuming a living room is used as a living/sleeping area) as shown in the table below. The levels may be exceeded if a room in addition to bedrooms and living room is used for sleeping.

Housing Quality Standards Maximum Occupancy in Units Selected	
Unit Size	Maximum Occupants
0	2
1	4
2	6
3	8
4	10
5	12
6	14

SECTION 5

INCOME AND SUBSIDY DETERMINATIONS

5.1. General

CHA will use the methods set forth in this Administrative Plan to verify and determine that family income at admission and at annual re-certification is correct. The accurate calculation of Annual Income and Adjusted Income will ensure that families are not paying more or less money for rent than their obligation under the regulations.

This Chapter defines the allowable expenses and deductions to be subtracted from Annual Income and how the presence or absence of household members may affect the Total Tenant Payment (TTP). The formula for the calculation of TTP is specific and not subject to interpretation. CHA's policies in this Chapter address those areas, which allow CHA discretion to define terms and to develop standards in order to assure consistent application of the various factors that relate to the determination of TTP.

5.2. Income and Allowances

The following definitions shall be applied when calculating total tenant payment, tenant rent and housing assistance payments:

Income – Income includes monetary and non-monetary amounts received by members of the households on a regular basis. For purposes of calculating the Total Tenant Payment, HUD defines what is to be calculated and what is to be excluded in the federal regulations. In accordance with this definition, all income, which is not specifically excluded in the regulations, is counted.

Income from Assets – Income from assets of less than \$5,000 will be limited to the amount stated on the self-declaration signed by the head of the household on the formal eligibility application or the annual recertification application. Income from assets of \$5,000 or more as declared by the family will be included as annual gross income based on the greater of the actual or the imputed income. Imputed income shall be based on the CHA established rate.

CHA will establish a passbook rate within HUD Safe Harbor standards (75 basis points; plus or minus .75 percent) of the Savings National Rate in effect at the time the rate is established. The passbook rate will never be zero and CHA will review the rate at least annually and adjust as needed to remain within the HUD Safe Harbor.

Annual Income: Defined as the gross amount of income anticipated to be received by the family during the 12 months after certification or re-certification. Gross income is the amount of income prior to any HUD allowable expenses or deductions, and does not include income, which has been excluded by HUD. Annual income is used to determine whether or not applicants are within the applicable income limits.

Adjusted Income: Defined as the Annual income minus any HUD allowable expenses and deductions.

Allowable deductions: HUD defines the allowable deductions as those listed below.

- **Dependent Allowance:** \$480 each for family members (other than the head or spouse) who are minors, and for family members who are 18 and older who are full-time students or who are disabled.
- **Elderly/Disabled Allowance:** \$400 per family for families whose head or spouse is 62 or over or disabled.
- **Allowable Medical Expenses:** Deducted for all family members of an eligible elderly/disabled family.
- **Child Care Expenses:** Deducted for the care of children under 13 when childcare is necessary to allow an adult member to work, attend school, or actively seek employment. Cannot exceed the amount of earned income and must be reasonable based on comparative costs in the community.
- **Disability Assistance Expenses:** Deducted for attendant care or auxiliary apparatus for persons with disabilities if needed to enable the individual or an adult family member to work.

5.3. Disallowance of Earned Income for Persons with Disabilities

The annual income for qualified disabled families may not be increased as a result of increases in earned income of a family member who is a person with disabilities beginning on the date on which the increase in earned income begins and continuing for a cumulative 12-month period. After the disabled family receives 12 cumulative months of the full exclusion, annual income will include a phase-in of half the earned income excluded from annual income.

A disabled family qualified for the earned income exclusion is a disabled family that is receiving tenant-based rental assistance under the Housing Choice Voucher Program; and

- Whose annual income increases as a result of employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment;
- Whose annual income increases as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program; or
- Whose annual income increases, as a result of new employment or increased earnings of a family member who is a person with disabilities, during or within six months after receiving assistance, benefits or services under any State program for TANF provided that the total amount over a six-month period is at least \$500.

The HUD definition of “previously unemployed” includes a person with disabilities who has earned in the previous 12 months no more than the equivalent earnings for working 10 hours per week for 50 weeks at the minimum wage. Minimum wage is the prevailing minimum wage in the State or locality.

The HUD definition of economic self-sufficiency program is: any program designed to encourage, assist, train or facilitate economic independence of assisted families or to provide work for such families. Such programs may include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as substance abuse or mental health treatment).

Amounts to be excluded are any earned income increases of a family member who is a person with disabilities during participation in an economic self-sufficiency or job training program and not increases that occur after participation, unless the training provides assistance, training or mentoring after employment.

The amount of TANF received in the six-month period includes monthly income and such benefits and services as one-time payments, wage subsidies and transportation assistance.

The amount that is subject to the disallowance is the amount of incremental increase in income of a family member who is a person with disabilities. The incremental increase in income is calculated by comparing the amount of the disabled family member's income before the beginning of qualifying employment or increase in earned income to the amount of such income after the beginning of employment or increase in earned income.

Exclusions of Income shall be calculated as follows:

Initial Twelve-Month Exclusion – During the cumulative 12-month period beginning on the date a member who is a person with disabilities of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, CHA will exclude from annual income of a qualified family any increase in income of the family member who is a person with disabilities as a result of employment over the prior income of that family member.

Second Twelve-Month Exclusion and Phase-in – During the second cumulative 12-month period after the expiration of the initial cumulative 12-month period referred to above, CHA will must exclude from annual income of a qualified family 50 percent of any increase in income of a family member who is a person with disabilities as a result of employment over income of that family member prior to the beginning of such employment.

Maximum Two Year Disallowance – The earned income disallowance is limited to a lifetime 24-month period for each family member who is a person with disabilities. For each family member who is a person with disabilities, the disallowance only applies for a maximum of 12 months of full exclusion of incremental increase, and a maximum of 12 months of phase-in exclusion during the 24-month period starting from the date of the initial exclusion. If the period of increased income does not last for 12 consecutive months, the disallowance period may be resumed at any time within the 48-month period, and continued until the disallowance has been applied for a total of 12 months of each disallowance (the initial 12-month full exclusion and the second 12-month phase-in exclusion). No earned income disallowance will be applied after the 48-month period following the initial date the exclusion was applied.

Applicability to Child Care and Disability Assistance Expense Deductions – The amount deducted for child care and disability assistance expenses necessary to permit employment shall not exceed the amount of employment income that is included in annual income. Therefore, for disabled families entitled to the earned income disallowance, the amounts of the full and phase-in exclusions from income shall not be used in determining the cap for child care and disability assistance expense deductions.

Tracking System – CHA will maintain a tracking system to ensure correct application of the earned income disallowance.

5.4. Minimum Rent

Minimum rent refers to the Total Tenant Payment and includes the combined amount a family pays towards rent and/or utilities when it is applied. The established minimum rent for all vouchers holders is \$50.00

A family may request an exception to the minimum rent based on financial hardship, which is defined as follows:

- The family has lost eligibility or is awaiting an eligibility determination for Federal, State, or local financial assistance;
- The income of the family has decreased because of changed circumstances, including: loss of employment; death in the family; and, other circumstances as determined by the PHA or HUD.

CHA will notify all families subject to minimum rents of their right to request a minimum rent hardship exception. This notification will be included in the briefing packet for initial admissions to the program and the HAP Contract Amendment issued at each re-certification of income. “Subject to minimum rent” means the minimum rent was the greatest figure in the calculation of the greatest of 30% of monthly-adjusted income, 10% of monthly income or minimum rent.

Requests for minimum rent exception must be made in writing within 10 days from the date of notification of the initial Housing Assistance Payment (HAP) payment or HAP adjustment and must include documentation as proof of financial hardship. CHA will use its standard verification procedures to verify circumstances, which have resulted in financial hardship.

Suspension of Minimum Rent – The minimum rent will be suspended until CHA makes a determination of hardship. “Suspension” means that CHA will not use the minimum rent calculation until a decision is made as to eligibility for the hardship. During the minimum rent suspension period, the family will not be required to pay a minimum rent and the housing assistance payment will be increased accordingly.

If CHA determines that the family is not eligible for the minimum rent exception, CHA will impose a minimum rent including payment for minimum rent from the time of suspension.

Temporary and long term are defined as follows:

Temporary Hardship – If CHA determines that the hardship is temporary; a minimum rent will not be imposed for a period of up to 90 days from the date of the family’s request. At the end of the temporary suspension period, a minimum rent will be imposed retroactively to the time of suspension.

Long-Term Duration Hardships – If it is determined that there is a qualifying long- term financial hardship; CHA will exempt the family from the minimum rent requirements until their next regularly scheduled annual recertification. The exemption from minimum rent shall apply from the first day of the month following the family’s submission of all required documentation.

The hardship exemption shall only be approved one time for each participating family.

5.5. Definition of Temporarily/Permanently Absent

It is the responsibility of the head of household to report changes in family composition. CHA will evaluate absences from the unit using this policy.

CHA will compute all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, CHA will count the income of the spouse or the head of the household if that person is temporarily absent, even if that person is not on the lease.

Income of persons permanently absent will not be counted. If the spouse is temporarily absent and, in the military, all military pay and allowances (except hazardous duty pay when exposed to hostile fire and any other exceptions to military pay HUD may define) is counted as income.

- **Temporarily Absent:** Defined as away from the unit for more than 30 days.
- **Permanently Absent:** Defined as away from the unit for 180 consecutive days except as otherwise provided in this Chapter.
- **Medical Absence:** Defined as any family member that leaves the household to enter a facility such as hospital, nursing home, or rehabilitation center. The family will be required to provide verification from a reliable medical source as to the likelihood and timing of return. If the verification indicates that the family member will be permanently confined to a facility, the family member will be considered permanently absent. If the verification indicates that the family member may return in less than 180 consecutive days, the family member will not be considered permanently absent. If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated.
- **Absence Due to Full-time Student Status:** A student (other than head of household or spouse) who attends school away from home but lives with the family during school recesses may, at the family's choice, be considered either temporarily or permanently absent. If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of Voucher size.
- **Absence Due to Incarceration:** If the sole member is incarcerated for more than 180 consecutive days, s/he will be considered permanently absent. Any member of the household, other than the sole member, will be considered permanently absent if s/he is incarcerated for three (3) consecutive months.

- **Absence of Children Due to Placement in Foster Care:** If the family includes a child or children temporarily absent from the home due to placement in foster care, CHA will determine from the appropriate agency when the child/children will be returned to the home. If the time period is to be greater than twelve (12) months from the date of removal of the child/ren, the Voucher size will be reduced. If all children are removed from the home permanently, the voucher size will be reduced in accordance with the subsidy standards.
- **Absence of Entire Family:** Defined as situations when the family is absent from the unit, but has not moved out of the unit. "Absence" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, CHA may write letters to the family at the unit, telephone the family at the unit, interview neighbors, verify if utilities are in service, and check with the post office. Families are required both to notify CHA before they move out of a unit and to give CHA information about any family absence from the unit.

Families must notify CHA at least 30 days before moving out of the unit or no less than 15 days after leaving the unit if they are going to be absent from the unit for more than 30 consecutive days.

If it is determined that the family is absent from the unit, CHA will continue assistance payments for the period of time estimated that the family will be absent but not more than six months provided that the family gave proper notice to CHA. If the family did not provide proper notice, assistance will be terminated at the end of the month following 30 days after notification of absence.

In cases where the family has moved out of the unit, CHA will terminate assistance in accordance with appropriate termination procedures contained in this Plan.

Caretaker for Children - Defined as a person placed in an assisted unit by an appropriate certified service agency that is acting as the legal guardian for children on the lease agreement. The following criteria will apply to these situations.

- If an appropriate agency has determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, CHA will treat that adult as a visitor for the first 120 days.
- If by the end of 120 days, court-awarded custody or legal guardianship has been awarded to the caretaker, the Voucher will be transferred to the caretaker.
- If the appropriate agency cannot confirm the guardianship status of the caretaker, CHA will transfer the voucher to the caretaker on a temporary basis with the condition that the caretaker must release the voucher if the original parent(s) are awarded custody at a later date.

Absence Due to Court Order: If a member of the household is subject to a court order that restricts him/her from the home for more than three (3) months, the person will be considered permanently absent.

5.6. Visitors

A visitor is a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent. A visitor can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.

A family may request an exception to this policy for valid reasons. However, an exception will not be made unless the family can identify and provide documentation of the residence to which the visitor will return.

5.7. Reporting Changes in Family Composition

Reporting changes in household composition is a basic family obligation under the voucher agreement between CHA and the assisted family. The family obligations require approval to add any other family member as an occupant of the unit and to inform CHA of the birth, adoption or court-awarded custody of a child within 30 days of occurrence.

The family must request prior approval from CHA of additional household members in writing. CHA will generally approve the addition household members that are the result of legal action: marriage, adoption or legal custody (if adult meets criminal background screening for eligibility), under the following criteria:

- Children under 18 years of age may be added to the assisted household if documentation is provided from any state's Department of Family & Children Services (SC DSS), or the applicable school district which verifies that the assisted household is the legal residence of the children, or Caregiver's Affidavit is completed and notarized.
- Regardless of the reason, the addition of children will not be approved if the children are members of another assisted household of any housing assistance program anywhere in the United States.
- Adult members that were previously removed from the assisted household at the request of the Head of Household, will only be approved to return as a household member as a reasonable accommodation for a disabled household member.
- Single adult household immediate family members will only be approved as additional family members if justification for the addition is provided, the addition does not require a change in voucher size for the assisted household and the unit is not overcrowded pursuant to HQS.

In addition to the above CHA requirements, the family must comply with the terms of their lease agreement with the owner which may require the family to obtain prior written approval from the owner when there are changes in family composition other than birth, adoption or court awarded custody. An interim reexamination will be conducted for any additions to the household.

If the family does not obtain prior written approval, any person the family has permitted to move in will be considered an unauthorized household member.

5.8. Averaging Income

When Annual Income cannot be anticipated for a full twelve months, CHA will average known sources of income that vary to compute an annual income. Therefore, an interim re-certification will not be completed when circumstances change.

If there are bonuses or overtime, which the employer cannot anticipate for the next twelve months, bonuses and overtime received the previous year will be used.

5.9. Minimum Income

There is no minimum income requirement for participation in the HCV Program. However, families that claim no income will be required to complete a zero-income survival statement. A new zero income survival statement shall be required to be completed by the family every 90 days for the period(s) during which the family continues to claim zero income. Regular contributions and gifts will be considered as income, including payment of utilities or any other bills by any other individual or organization.

If the family's expenses exceed their known income, CHA will make inquiry of the head of household as to the nature of the family's accessible resources and will use all available resources to determine if the family has unreported income.

5.10. Income of Person Permanently Confined To Nursing Home

If a family member is permanently confined to a hospital or nursing home and there is a family member left in the household, CHA will calculate the income by using the following methodology and use the income figure which would result in a lower payment by the family:

- The income of the family member confined will be included and corresponding out of pocket medical expenses will be deducted; or,
- The income of the family member confined will not be included and corresponding out of pocket medical expenses will not be deducted.

5.11. Regular Contributions and Gifts

Regular contributions and gifts to the household are counted as income for calculation of the Total Tenant Payment and Tenant Rent. Any contribution or gift received more than one time in an annual period will be considered regular unless such amount is less than \$100 on an annual basis.

This includes utility and rent payments made on behalf of the family by an outside source and any other cash or non-cash contributions.

5.12. Alimony and Child Support

Regular alimony and child support payments are counted as income for calculation of Total Tenant Payment. If the amount of child support or alimony received is less than the amount awarded by the court, CHA will use the amount awarded by the court unless the family can verify that they are not receiving the full amount and verification of such is provided as follows:

- Verification from the agency responsible for enforcement or collection;
- Documentation of child support or alimony collection action filed through a child support enforcement/collection agency, or collection action filed through an attorney.

5.13. Lump-Sum Receipts

Lump-sum payments caused by delays in processing periodic payments such as unemployment or welfare assistance are counted as income. Deferred periodic payments, which have accumulated due to a dispute, are also counted as income.

In order to determine amount of retroactive tenant rent that the family owes as a result of the lump sum receipt, CHA will use a calculation method, which calculates retroactively or prospectively, depending on the circumstances.

- **Prospective Calculation Methodology:** If the payment is reported on a timely basis, (as required under interim reporting requirements) the calculation will be done prospectively and will result in an interim adjustment calculated as follows: the entire lump-sum payment will be added to the annual income at the time of the interim and total tenant payment and tenant rent will be calculated accordingly.
- **Retroactive Calculation Methodology:** If the payment is not reported on a timely basis, CHA will go back to the date the lump-sum payment was received, or to the date of admission, whichever is closer and determine the amount of income for each certification period, including the lump sum, and recalculate the tenant rent for each certification period to determine the amount due to CHA. The family will then be required to pay this amount to CHA in full from the lump sum proceeds. Failure to make payment will result in termination of assistance.
- **Attorney Fees:** The family's attorney fees may be deducted from lump-sum payments when computing annual income if the attorney's efforts have recovered a lump-sum compensation, and the recovery paid to the family does not include an additional amount in full satisfaction of the attorney fees.

Lump-sum additions to Family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses, are not included in income but are included as assets. Lump sum payments from Social Security or SSI are excluded from income, but any amount remaining will be considered an asset.

5.14. Contributions to Retirement Funds

While an individual is employed, contributions to company retirement/pension funds count as assets if the family can access the funds without retiring or terminating employment. After retirement or termination of employment, any amount the employee elects to receive as a lump sum is counted as a lump sum payment as described above.

5.15. Assets Disposed of For Less Than Fair Market Value

CHA will count assets disposed of for less than fair market value during the two years preceding certification or reexamination by including the difference between the market value and the actual payment received when calculating total assets if the fair market value of such assets is greater than \$1,000.

Assets disposed of as a result of foreclosure or bankruptcy will not be considered to be assets disposed of for less than fair market value. Assets disposed of as a result of a divorce or separation will also not be considered assets disposed of for less than fair market value.

5.16. Child Care Expenses

Childcare expenses for children under 13 may be deducted from annual income if they enable an adult to work or attend school full time, or to actively seek employment.

A childcare deduction will only be provided based on the following guidelines:

- **Childcare to Work:** The maximum childcare expense allowed must be less than the amount earned by the person enabled to work. The “person enabled to work” will be the adult member of the household who earns the least amount of income from working.
- **Childcare for School:** The number of hours claimed for child care may not exceed the number of hours the family member is attending school, including reasonable travel time to and from school.
- **Reimbursement:** Childcare expense cannot be reimbursable from any other source. If a divorce decree provides for joint payment of childcare, expenses will be prorated accordingly.

5.17. Medical Expenses

Elderly and disabled households are entitled to deductions for allowable medical expenses. If the household qualifies for a medical deduction then the medical expenses of all household members are an allowable deduction.

Allowable expenses include but are not limited to insurance premiums; hospital and doctor costs; and, prescription medicines. Nonprescription medicines, acupressure, acupuncture, herbal medicines and chiropractic services will not be considered allowable medical expenses. The IRS Publication 502 will govern the final determination as to whether a particular medical expense is permitted or prohibited as an allowable deduction.

5.18. Pro-ratio Of Assistance for “Mixed” Families

A “mixed” family is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible members. Housing assistance will be prorated for mixed families based on the following calculation.

The total housing assistance shall be calculated based on income, assets, allowances and deductions for all household members. The percent of eligible household members is determined by dividing the number of U. S. Citizens or eligible immigrants in the household by the total number of household members. The total amount of housing assistance is then multiplied by the percent of the eligible household members. This is the amount of housing assistance that will be paid on behalf of a mixed family.

5.19. Income Changes Resulting from Welfare Program Requirements

The CHA will not reduce the rental contribution for families whose welfare assistance is reduced specifically because of:

- Fraud by a family member in connection with the welfare program; or
- Failure to participate in an economic self-sufficiency program; or

- Noncompliance with a work activities requirement.

However, CHA will reduce the rental contribution if the welfare assistance reduction is a result of:

- The expiration of a lifetime time limit on receiving benefits; or
- A situation where a family member has not complied with other welfare agency requirements; or
- A situation where a family member has complied with welfare agency economic self-sufficiency or work activities requirements but cannot or has not obtained employment, such as the family member has complied with welfare program requirements, but the durational time limit, such as a cap on the length of time a family can receive benefits, causes the family to lose their welfare benefits.

Imputed welfare income is the amount of annual income not actually received by a family as a result of a specified welfare benefit reduction that is included in the family's income for rental contribution and is treated as follows:

- Imputed welfare income is not included in annual income if the family was not an assisted resident at the time of sanction.
- The amount of imputed welfare income is offset by the amount of additional income a family receives that begins after the sanction was imposed.
- When additional income is at least equal to the imputed welfare income, the imputed welfare income is reduced to zero.

CHA will obtain written verification from the welfare agency stating that the family's benefits have been reduced for fraud or noncompliance with economic self-sufficiency or work activities requirements before denying the family's request for rent reduction. The welfare agency, will inform the CHA of: amount and term of specified welfare benefit reduction for the family; reason for the reduction; and subsequent changes in term or amount of reduction.

5.20. Utility Allowance and Utility Reimbursement Payments

CHA will develop a utility allowance schedule, which is intended to cover the cost of utilities not included in the rent to the owner. This allowance is based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type. Allowances are not based on an individual family's actual energy consumption.

Four jurisdiction-wide utility allowances will be established:

- Single Family,
- Multi-Family Apartment Units
- Mobile Homes
- Duplex and Townhomes Units

Costs of utilities in different municipalities and difference providers within CHA's jurisdiction will be averaged to determine the most applicable allowance for each unit

type.

If a unit is located in a Low-Income Housing Tax Credit property and the property has adopted a project specific utility allowance, CHA will utilize the applicable allowance if the property can demonstrate that the allowance is supported by an independent third-party review.

The utility allowance for an individual family includes the utilities and services that are necessary to provide housing that complies with the Federal Housing Quality Standards. No allowance will be provided for non-essential utility costs, such as telephone, internet services, cable, or satellite television. Where families provide their own range and refrigerator, CHA will include an appliance allowance as part of the total utility allowance provided to the family.

Lease agreements with tenant paid utilities will only be approved for utilities that are individually metered for the unit receiving assistance. The individual meter must only service the living space in which the family has access. The property owner must retain responsibility for any utility that is not individually metered.

CHA will review the utility allowance schedule annually. If the review finds a utility rate has changed by 10% or more since the last revision of the utility allowance schedule, the schedule will be revised to reflect the new rate. Revised utility allowances will be applied in a participant family's rent calculation at their next re-certification.

When the calculation on the HUD 50058 results in a utility housing assistance payment due to the family, CHA will provide a Utility Housing Assistance Payment (UHAP) to the family via a cash card issued to the family. The cash card will be re-loaded by the 7th day of each month for the months in which the family is entitled to receive a UHAP payment.

5.21. Calculating Annual Income CHA may calculate annual income based on the past actual income received or earned within the last 12 months prior to the recertification unless the participant provides verification that circumstances have changed. If the family has a history of seasonal employment and unemployment benefits, CHA will annualize both sources of income and a subsequent interim recertification will not be completed when circumstances change throughout the year following the annual re-certifications.

SECTION 6

VERIFICATION PROCEDURES

6.1. General

All factors affecting eligibility for the HCV Program and calculation of total tenant payment, tenant rent and housing assistance will be verified by CHA. Applicants and program participants must provide true and complete information upon request by CHA. Verification requirements are designed to maintain program integrity.

This Chapter explains the procedures and standards for verification of income, assets, allowable deductions, family status, and changes in family composition. CHA will obtain proper authorization from the family before requesting information from independent sources.

6.2. SSN Documentation:

Applicants and participants (including each member of the household) are required to provide documentation of each disclosed Social Security Number. Acceptable evidence of the SSN consists of:

- An original SSN card issued by SSA;
- An original SSA-issued document, which contains the name and SSN of the individual; or
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

Rejection of Documentation – CHA may reject documentation of the SSN provided by the applicant or participant for only the following reasons:

- The document is not an original document; or
- The original document has been altered, mutilated, or not legible; or
- The document appears to be a forged document (i.e. does not appear to be authentic).

CHA will explain to the applicant or participant, the reason(s) the document is not acceptable and request the individual to obtain acceptable documentation of the SSN and submit it to the CHA within 10 calendar days.

Verification of the SSN – CHA will verify each disclosed SSN by:

- Obtaining the documentation listed above from applicants and participants (including each member of the household);
- Making a copy of the original documentation submitted, returning it to the individual, and retaining the copy in the file folder; and
- Recording the SSN on line 3n of the form HUD-50058, and transmitting the form HUD-50058 to HUD within 30 calendar days of completing the form, to enable HUD to initiate its computer matching efforts. **Note: not applicable to applicants.**

HUD, via its computer matching program with the SSA, will validate the SSN (along with the individual's name and date of birth) against the SSA's database. EIV will report the status of the identity verification process as **Verified**, **Failed**, **Not Verified**, or **Deceased** on the household **Summary Report**. Below is a summary of the action CHA will take for each identity verification status.

- **Verified.** If the information matches the SSA database, the individual's identity verification status will be **Verified**. No further action is required.
- **Failed.** If the information does not match the SSA database, the identity verification status will be **Failed**. Individuals whose identity verification status is failed will be required to provide CHA with additional information and verification documents as requested and necessary to determine correct identification.
- **Not Verified.** If an individual's identity verification status is **Not Verified** this means that HUD has not yet sent the tenant's personal identifiers to SSA for validation. No further action is required.
- **Deceased.** If an individual's identity verification status is **Deceased** this means that SSA's records indicate the person is deceased. CHA will confirm the death with the family's head of household or listed emergency contact person.

Once the individual's verification status is classified as **verified**, CHA will remove and destroy, by no later than the next re-exam of family income or composition, the copy of the documentation provided and retain only the verification documentation from the EIV report.

Individuals without an assigned SSN – Citizens and lawfully present noncitizens who state that they have not been assigned a SSN by the SSA, must make such declaration in writing and under penalties of perjury to the CHA. This declaration will be maintained in the tenant file.

An alternate ID will be assigned to those individuals who do not have or unable to disclose a SSN. Once an individual discloses a SSN, CHA will delete the ALT ID and secure a verified status of the SSN provided.

6.3. The Enterprise Income Verification (EIV) System

The EIV system is a web-based application which provides CHA with employment, wage, unemployment compensation and social security benefit information for participants of the Housing Choice Voucher Program. Information in EIV is derived from computer matching programs between HUD, Social Security Administration (SSA), Department of Labor (DOL), and the Department of Health and Human Services (HHS).

EIV is classified by HUD as an upfront income verification (UIV) technique and is considered by HUD as an automated third party written verification.

6.4. Verification of Social Security Income

Income from Social Security will be verified for applicants with a SSA benefit verification letter (dated within the last 60 days of the PHA request date for information) provided by the family. Income from Social Security will be verified for participants with an **EIV Income Report** which displays the current social security benefit amount.

6.5. The Verification Hierarchy

CHA is required by HUD to access the EIV system and obtain an Income Report for each assisted household. CHA is required to maintain the EIV report in the participant file along with the HUD 50058 form and other supporting documentation to support income and rent determinations.

If the EIV income report does not contain any employment and income information for the family, CHA will secure necessary information in the order of the hierarchy listed below.

LEVEL	VERIFICATION TECHNIQUE	RANKING
6	Upfront income verification (UIV) using HUD's EIV system.	Highest (Mandatory)
5	Upfront income verification (UIV) using non-HUD system.	Highest (Optional))))))
4	Written third party verification (authentic document generated by a third-party source but supplied by the participant)	High (Mandatory to supplement EIV reports when EIV has no data. (Mandatory for non- EIV income sources and when participants dispute EIV information
3	Written third party verification form	Medium-Low (Mandatory if third party verification is not available or is rejected by CHA; and when participant/applicant is unable to provide acceptable documents.
2	Oral third-party verification	Low (Mandatory only when no third-party verification is available)
1	Tenant Declaration	Very Low (use as a last resort when unable to obtain any type of third-party verification.)

All verifications regardless of level must be dated within 60 days prior to the request of CHA to provide the documents. Level four verification documents that serve to verify income amounts, based on the frequency of the pay schedule, must include a minimum of two consecutive paycheck stubs if paid bi-weekly or a minimum of three paystubs if paid weekly, within thirty days of the commencement of employment.

CHA will provide applicants and participants with a maximum of ten (10) business days to respond to requests for level four documents. Failure to provide documents within this period will result in proposed termination of assistance or removal from the waiting list.

CHA will allow two (2) weeks for return of level three documents before going to the next level identified above. The file will be documented as to why third-party verification was not used.

6.6. Release of Information

All adult family members will be required to sign the HUD 9886 Release of Information/Privacy Act form. In addition, family members will be required to sign specific authorization forms when information is needed that is not covered by the HUD form 9886. Family refusal to cooperate with the HUD prescribed verification system will result in denial of admission or termination of assistance based on violation of the family obligation to supply any information and to sign consent forms.

6.7. Income Discrepancy Reports

At least annually, CHA will analyze the Income Discrepancy Report from the HUD EIV system. CHA will send a letter within 10 business days from the end of each quarter to schedule a meeting with participants identified in EIV with an income discrepancy. The income discrepancy will be explained to the family as well as the family's obligations to resolve and/or dispute the discrepancy.

If the family disputes the discrepancy, they are responsible for contacting the reporting employer to secure documentation that will support their dispute. If the family claims that the discrepancy is the result of stolen identity, the family is responsible for providing CHA with legal documentation that will support their claim of stolen identity.

If the family does not dispute the claim, CHA will proceed to terminate the family's housing assistance in accordance with the termination provisions outlined in the Administrative Plan.

6.8. Items to be Verified

The following information must be verified to determine initial program eligibility, to calculate total tenant payment, tenant rent and housing assistance and at each annual re-certification of income.

- All income not specifically excluded by the regulations.
- Full-time student status including High School students who are 18 or over.
- Current assets including assets disposed of for less than fair market value
- Childcare expense where it allows an adult family member to be employed or to further his/her education.
- Total medical expenses of all family members in households whose head or spouse is elderly or disabled.
- Disability assistance expenses for costs associated with attendant care or auxiliary apparatus for a disabled member, which allow an adult family member to be employed.
- Disability for determination of allowances or deductions.
- U.S. citizenship/eligible immigrant status
- Social Security Numbers for all family members over 6 years of age or older who have been issued a social security number.
- Familial status when needed for head or co-head definition.
- Verification of Reduction in Benefits for Noncompliance
- Financial assistance and related costs for post-secondary education

6.9. Verification of Non-EIV Sources

Verification of information not included on the EIV report or of non EIV sources includes income sources described below.

Welfare Payments or General Assistance – Alternate methods of verification include, in this order: on-line statements from State Welfare systems; verification form completed by payment provider; written statement from payment provider indicating the amount of grant/payment, start date of payments, and anticipated changes in payment in the next 12 months; computer-generated Notice of Action; computer-generated list of recipients from Welfare Department.

Alimony or Child Support Payments – Alternate methods of verification include, in this order: on-line statements from Child Support agencies; copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules; a notarized letter from the person paying the support; copy of latest check and/or payment stubs from Court Trustee.

If payments are irregular, the family must provide: a copy of the separation or settlement agreement, or a divorce decree stating the amount and type of support and payment schedules; a statement from the agency responsible for enforcing payments to show that the family has filed for enforcement...

Net Income from a Business – In order to verify the net income from a business, CHA will view IRS and financial documents from prior years and use this information to anticipate the income for the next 12 months. Acceptable methods of verification include: IRS Form 1040, including: Schedule C (Small Business); Schedule E (Rental Property Income); Schedule F (Farm Income); if accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules; audited or unaudited financial statement(s) of the business; credit report or loan application; Documents such as manifests, appointment books, cash books, bank statements, and receipts will be used as a guide for the prior six months (or lesser period if not in business for six months) to project income for the next 12 months. The family will be advised to maintain these documents in the future if they are not available.

Zero Income Status – Families claiming to have no income will be required to complete a "survival statement". If the family continues to claim zero income, they will be required to complete a "survival statement" every 90 days. CHA will also secure a credit report for all families claiming zero income to determine if the family has an unreported income source.

Full-time Student Status – Verification of full-time student status includes: written verification from the registrar's office or other school official; school records indicating enrollment for sufficient number of credits to be considered a full-time student by the educational institution.

Savings Account Interest Income and Dividends – Acceptable methods of verification include, in this order: account statements, passbooks, certificates of deposit, or PHA verification forms completed by the financial institution and broker's statements showing value of stocks or bonds and the earnings credited the family. Earnings can be obtained from current newspaper quotations or oral broker's verification; IRS Form 1099 from the financial institution, provided that the PHA must adjust the information to project earnings expected for the next 12 months.

Interest Income from Mortgages or Similar Arrangements – Acceptable methods of verification include, in this order: a letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months. (A copy of the check paid by the buyer to the family is not sufficient unless a breakdown of interest and principal is shown.); amortization schedule showing interest for the 12 months following the effective date of the certification or re-certification.

Net Rental Income from Property Owned by Family – Acceptable methods of verification include, in this order: IRS Form 1040 with Schedule E (Rental Income); copies of latest rent receipts, leases, or other documentation of rent amounts; documentation of allowable operating expenses of the property: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense; lessee's written statement verifying rent payments to the family and family's self-certification as to net income realized.

Family Assets – CHA will require information necessary to determine the current cash value of the family's assets, (the net amount the family would receive if the asset were converted to cash). Acceptable verification may include any of the following: verification forms, letters, or documents from a financial institution or broker; passbooks, checking account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker; quotes from a stock broker or realty agent as to net amount family would receive if they liquidated securities or real estate; real estate tax statements if the approximate current market value can be deduced from assessment; financial statements for business assets; copies of closing documents showing the selling price and the distribution of the sales proceeds; appraisals of personal property held as an investment.

Assets Disposed of for Less than Fair Market Value (FMV) – For all certifications and re-certifications, CHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. If the family certifies that they have disposed of assets for less than fair market value, verification is required that shows: (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.

Child Care Expenses – Written notarized verification from the person who receives the payments is required. Verifications must specify the child care provider's name, address, telephone number, the names of the children cared for, the number of hours the child care occurs, the rate of pay, and the typical yearly amount paid, including school and vacation periods. CHA will also request verification as to whether the certifying individual is a licensed childcare provider and advise the provider that such income may be reported to other sources including the IRS.

Medical Expenses – All expense claims will be verified by one or more of the methods: written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, of (a) the anticipated medical costs to be incurred by the family and regular payments due on medical bills; and (b) extent to which those expenses will be reimbursed by insurance or a government agency; written confirmation by the insurance company or employer of health insurance premiums to be paid by the family; written confirmation from the Social Security Administration of Medicare premiums to be paid by the family over the next 12 months.

Assistance to Persons with Disabilities – Written certification from a reliable, knowledgeable professional that the person with disabilities requires the services of an attendant and/or the use of auxiliary apparatus to permit him/her to be employed or to function sufficiently independently to enable another family member to be employed. Family's certification as to whether they receive reimbursement for any of the expenses of disability assistance and the amount of any reimbursement received.

- **Attendant Care:** Attendant's written certification of amount received from the family, frequency of receipt, and hours of care provided. Certification of family and attendant and/or copies of canceled checks family used to make payments.
- **Auxiliary Apparatus:** Receipts for purchases or proof of monthly payments and maintenance expenses for auxiliary apparatus. In the case where the person with disabilities is employed, a statement from the employer that the auxiliary apparatus is necessary for employment is needed.

6.10. Verifying Non-Financial Factors

CHA will require applicants to furnish verification of legal identity for all family members. The following documents will be considered acceptable verification of legal identity for adults. If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required: certificate of birth, naturalization papers; church issued baptismal certificate; U.S. military discharge (DD 214); or U.S. Passport.

Documents considered acceptable for the verification of legal identity for minors may be one or more of the following: certificate of birth; adoption papers; custody agreements; or, documents from a state or federal agency that includes the date of birth of the minor.

6.11. Familial Relationships

Certification will normally be considered sufficient verification of family relationships. In cases where reasonable doubt exists, the family may be asked to provide verification. Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer. Verification of a separation may be a copy of court-ordered maintenance or other legal records.

6.12. Verification of Permanent Absence of Family Member

If the family reports an adult member who was formerly a member of the household permanently absent, the following information must be presented as verification prior to removing any household member from the assisted household: legal evidence of divorce action; evidence of legal separation; order of protection/restraining order obtained by one family member against another; lease or rental agreement showing the individual listed as the member of another household; a document from a Court or correctional facility stating how long they will be incarcerated. CHA will verify with the U.S. Postal service to determine if there has been a change of address entered for the adult person reported as permanently absent.

6.13. Verification of Disability

Verification of disability must be receipt of SSI or SSA disability payments under Section 223 of the Social Security Act or 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7) or verified by appropriate diagnostician such as physician, psychiatrist, psychologist, therapist, rehab specialist, or licensed social worker, using the HUD language as the verification format.

6.14. Verification of Income

In determining annual income, CHA will calculate anticipated income over the next 12 months. Third-party documentation will be requested pursuant to the hierarchy above.

SECTION 7

VOUCHER ISSUANCE AND RESCISSION

7.1. General

CHA's goals and objectives are designed to assure that families selected to participate are equipped with the tools necessary to locate an acceptable housing unit; that families are provided sufficient knowledge and information regarding the program; and, how to achieve maximum benefit while complying with program requirements. When eligibility has been determined, CHA will conduct a mandatory briefing to ensure that families know how the program works.

The briefing will provide a broad description of owner and family responsibilities, program procedures, and how to lease a unit. The family will also receive a briefing packet, which provides more detailed information about the program including the benefits of moving outside areas of poverty and minority concentration.

This Chapter describes how briefings will be conducted, the information that will be provided to families, and the policies that will apply when vouchers must be rescinded or terminated due to budgetary constraints.

7.2. Issuance of Vouchers

When funding is available, CHA will issue vouchers to applicants whose final eligibility has been determined. CHA will strive to maintain 100% utilization of all program funds. Program capacity will be closely monitored to determine success rates, average lease up time, and monthly turnover. This statistical information will serve as the basis to determine the number of vouchers to be issued on an ongoing basis to achieve the 100% utilization rate of annual budget authority.

7.3. Briefing Types and Required Attendance

Initial Applicant Briefing – A full program briefing will be conducted for applicant families who are determined to be eligible for assistance. The briefings will be conducted in groups. However, families who attend group briefings and still have the need for individual assistance will be referred to leasing staff for additional guidance. All briefings will utilize audio-visual aids to assist applicants with limited comprehension or second language needs. Other reasonable accommodations will be provided to individuals who are disabled upon notification to CHA. While we recognize the inconvenience to the family, children will not be permitted at the briefing session in order to ensure an informative learning environment that will meet the needs of all applicants.

The purpose of the briefing is to explain how the program works and distribute the required documents in the voucher packet to applicants. This will enable families to utilize the program to their advantage, and prepare them to discuss the Housing Choice Voucher Program with potential owners and property managers.

CHA will not issue a voucher to an applicant family unless the household representative has attended a briefing and signed the voucher form. Applicants who provide prior notice of inability to attend a briefing will automatically be scheduled for the next briefing. Applicants who fail to attend two (2) scheduled briefings will be denied admission based on failure to supply information needed for certification.

Briefing Packet – The documents and information provided in the briefing packet for the voucher program include the following required items:

- HUD approved voucher form indicating the term of the voucher;
- Housing search record form;
- CHA's policy for requesting extensions of the voucher;
- A description of the method used to calculate the housing assistance payment for a family;
- Payment standards and utility allowance schedule(s);
- Explanation of the maximum allowable rent for an assisted unit including the rent reasonableness standard and affordability standards;
- Where the family may lease a unit;
- Owner and family responsibilities;
- Maps indicating areas of low poverty encouraging the families to use their voucher in these areas.
- Portability procedures and an explanation of how portability works;
- HUD required tenancy addendum;
- HUD approved Request for Tenancy Approval (RTA) form;
- A statement of the CHA policy on providing information about families to prospective owners;
- HUD brochure "A Good Place to Live" on how to select a unit that complies with HQS;
- HUD required information on lead-based paint;
- Applicants rights to a review of CHA decisions and participants rights to informal hearings;
- Requirements for reporting changes in income and family composition;
- Fair Housing rights and a housing discrimination complaint form;
- Information on how to access listings of available rental units via Social Serve;
- Information about the Family Self-sufficiency Program; and,
- Information about the Section 8 Homeownership Program.

Program Move Briefing – Program participants that have been under lease for a period of one year may opt to move to another assisted unit at the anniversary date of their lease agreement and Housing Assistance Payments contract. Families approved to move must attend a "Program Move" briefing describing the requirements for a successful move within the program.

A program move briefing packet containing the following information will be provided to the program participant:

- HUD approved voucher form indicating the term of the voucher;
- Instructions for program moves;
- Current payment standards and utility allowances;
- Request for Tenancy Approval; and,

- HUD required information on lead-based paint;
- Information on how to access listings of available rental units via Social Serve;
- Information about the Family Self-sufficiency Program; and,
- Information about the Section 8 Homeownership Program.

7.4. Housing Opportunity and Mobility

CHA will provide information at the briefings to assist applicants and program participants with assistance in locating to areas of low poverty. A map will be provided to applicants indicating areas of low poverty. Program move briefings will include detailed information on portability.

7.5. Security Deposit Requirements

The payment of a security deposit is an issue strictly between the owner and the voucher holder. The HCV program does not assist with security deposit payments and the Housing Choice Voucher Program does not provide for any special claims or payments for unpaid rent, damages or vacancy loss to the owner.

The owner is not required to but may collect a security deposit from the assisted household in accordance with local market practices. Security deposits charged by owners may not exceed those charged to unassisted households nor exceed the maximum prescribed by state or local law.

7.6. Term of Voucher

New Admissions – During the briefing session, each household will be issued a voucher, which represents a contractual agreement between CHA and the Family, specifying the rights and responsibilities of each party. It does not constitute admission to the program, and the family remains an applicant, until such time that a lease and contract become effective.

The voucher is valid for a period of ninety calendar days from the date of issuance. The family must submit a Request for Tenancy Approval (RFTA) within the ninety-day period or request an extension in accordance with the extension provisions outlined below. If the Voucher has expired, and has not been extended, the family will not receive assistance and will be removed from the waiting list. The family will not be entitled to a review or hearing.

Program Move Participants – Vouchers for Program Moves are valid for 60 days and will not be extended. The family must submit an acceptable RFTA within the initial voucher period or a move will not be approved. If the voucher expires and the family is currently assisted, they may remain as a participant in their unit if there is an assisted lease/contract in effect.

If the family had vacated their assisted unit prior to locating a new unit and their program move voucher expires, no further assistance will be provided and the family will be considered as having voluntarily left the program. The family will not be entitled to a review or a hearing.

Extension will only be grant if it is for an approved Reasonable Accommodation – CHA will extend the voucher term up to 180 days from the beginning of the initial term if the family needs and makes a written request for an extension as a reasonable accommodation to make the program accessible to and usable by a family member with a disability, provided that such request is made prior to the expiration of the initial term of the voucher.

Within 15 business days after the expiration of the voucher term or any extension thereof, CHA will advise the family in writing that the voucher term has expired and that the family must re-apply for housing in the future to be placed on the waiting list.

7.7. Transfer and Retention of Voucher

Assistance may only be transferred to someone other than the designated head of household or co-head of household if the head or co-head involuntarily leave the household. No household member may voluntarily assign the assistance to another household member.

CHA will only approve the transfer of a voucher if a remaining member of the household is a sole member or legally obtains custody of the remaining minor members of the household. To be considered the remaining member of the assisted family, the person must have been previously approved by CHA to be living in the unit, identified on the HUD 50058 at the most recent re-certification and be listed on the most recent lease agreement with the owner.

A live-in attendant, by definition, will not be considered a remaining member of the family and will not be entitled to any continued assistance if the person who they were assisting ceases to receive assistance for any reason. A minor child may only be considered as a remaining member of the household if a court has awarded emancipated minor status to the minor. A reduction in family size may require a corresponding reduction in the voucher family unit size.

7.8. Rescinding Vouchers

If, due to budgetary constraints, CHA must rescind vouchers that have already been issued to families, CHA will do so in accordance with the instructions in each category listed below.

Category 1: Vouchers issued but for which CHA has not yet received a Request for Tenancy Approval (RFTA) – Vouchers in this category will be rescinded based on the date in which they were issued.

Category 2: Voucher issued in which CHA has received a Request for Tenancy Approval (RFTA) – Vouchers in this category will be rescinded based on the date in which the RFTA was received starting with the most recently received.

7.9. Termination of Vouchers with Active HAP Contracts

If, due to budgetary constraints, CHA must terminate vouchers under an active Housing Assistance Payment (HAP) contract, CHA will do so in accordance with HUD requirements and the guidelines set forth below.

On a monthly basis, CHA shall undertake a review of utilization for the purpose of determining if the program is fully utilizing the available annual budget authority. In the event that ABA is under-utilized or over-utilized, appropriate corrective action will be taken to increase or decrease utilization as appropriate. Reasonable and necessary measures will be undertaken to maintain program costs in line with the objectives of a full, but not excessive, utilization of funding by:

- Optimizing the number of qualified families assisted by the program (full, but not excessive, leasing of the baseline number of vouchers authorized) while providing housing choice, and
- Ensuring that Rents to Owners are reasonable in light of comparable rents in the unassisted market.

CHA shall periodically review and adjust operating parameters of the program to achieve the above objectives. To the extent necessitated by program circumstances, CHA shall consider, adopt, and implement any or all of the following cost containment or cost reduction measures:

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

7.10 Declaration of Insufficient Funding – Prior to the termination of any voucher under an active HAP contract for reason of insufficient funding, a formal “Declaration of Insufficient Funding” shall be issued. This declaration shall be made in writing and signed by the Executive Director.

A Declaration of Insufficient Funding will be made only if the following conditions are present, documented, and confirmed:

- CHA has taken all reasonable and prudent steps to reduce HAP costs and a thorough analysis of remaining ABA authority has been completed and after factoring in the projected impact of the reasonable HAP cost containment and control steps outlined above, determines that ABA and any available Net Restricted Assets (NRA) funding is or will be depleted and there will be insufficient funds to support the current or projected number of assisted families for any part of the remainder of the calendar year;
- The CHA has, in good faith, investigated possible alternative sources of funds, including but not limited to Project Reserves, Administrative Fee Reserves, and Non-Federal resources, available to support the current or projected level of HAP assistance through the remainder of the calendar year and has determined that such available alternative funding is insufficient; and
- The analysis, findings, and actions detailed above are thoroughly documented and approved in writing by the Executive Director.

- The formal “Declaration of Insufficient Funding” shall identify the magnitude of the funding shortfall, past, current and planned steps taken to mitigate the shortfall, and an assessment of the fiscal impact of continuing HAP assistance at the current or projected rate.

7.11 Authorization to Terminate HAP Contracts – Authority to approve the termination of HAP contracts due to insufficient funding is vested in the CHA Board of Commissioners. Approval to terminate HAP contracts shall be granted only through formal resolution of the Board after it has duly considered a formal **Declaration of Insufficient Funding**.

A Request to Terminate HAP Contracts Due to Insufficient Funding will be presented to the Board of Commissioners in writing and detail:

- The approximate number and dollar value of HAP contracts to be terminated;
- The timetable for contract terminations; and
- The Administrative Plan reference that details the procedure to be used to terminate the contracts; and
- Signature of the Executive Director accompanied by the Declaration of Insufficient Funding.

7.12 Selecting Contracts to be Terminated – The CHA shall terminate contracts under this provision to achieve a leasing/utilization rate that is consistent with the financial resources available to the HCV program. A HAP Contract Termination List shall be prepared which identifies each contract (by participant, owner, address, and effective date of the first HAP contract provided by the CHA on behalf of the participant) to be terminated in accordance with the established order of priority.

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

- **Outgoing portable vouchers.** Initial assistance for these vouchers shall be determined by the date of the first HAP contract that began the most recent period of continuous assistance for which the CHA has responsibility for payment. This includes any contract executed by the receiving PHA.
- **Incoming Portable Voucher HAP Contracts** (for which the payments by the Initial PHAs have not been received in the last three consecutive months and for which the Initial PHA has been given appropriate notification and opportunity to cure the delinquency). Initial assistance is determined by the date of the first HAP contract that began the most recent period of continuously CHA-administered assistance.
- **Incoming Portable Voucher HAP Contracts** (for which the initial PHA refuses to honor billings). The CHA may be forced to absorb such contracts from time to time as a result of the initial agency's refusal to honor billing. The CHA will absorb such contracts as funding permits; however, in the event of funding shortfalls, these contracts will be terminated.

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

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

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

Responsibility to Maintain Current Contact Information on File – Participants whose voucher is terminated for the reasons under this section, shall be responsible for maintaining current contact information on file with CHA. If future funding permits the reinstatement of assistance and CHA is unable to contact the family due to incorrect information on file, the family will be permanently removed from the program and no further efforts will be made to reinstate assistance. Households terminated due to insufficient funding shall be wait listed for a period of three years and shall be selected for issuance of a voucher prior to any applicants on the pre-application waiting list.

7.15 Resumption of Funding – Insufficiently funded participants will be offered the opportunity to receive vouchers in the reverse order of their termination under this section (i.e., those terminated last will be the first to receive offers of vouchers).

At the time it is determined that assistance may be resumed, CHA will provide written notice to an impacted participant informing them of their opportunity to resume their voucher. This notice shall inform family of the:

- Process by which they will be assessed for eligibility for a voucher;
- Date, time, and location to which the family's affirmative response to the notice must be delivered; and
- The eligibility criteria for receipt of a voucher

All factors of initial eligibility will be re-assessed prior to reinstatement of a voucher and resumption of assistance. Only families meeting the eligibility requirements will be issued a voucher. Families that successfully lease a unit in accordance with the terms of their vouchers will be considered new admissions.

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

SECTION 8

APPROVAL OF TENANCY AND CONTRACT EXECUTION

8.1. General

CHA's program operations are designed to utilize available resources in a manner that is efficient and provides eligible families timely assistance based on the number of units that have been budgeted. Program objectives include maximizing HUD funds by providing assistance to as many eligible families and for as many eligible units as the budget will allow. After families are issued a voucher, they may search for a unit anywhere within the designated jurisdiction. The family must find an eligible unit under the program rules, with an owner/landlord who is willing to enter into a Housing Assistance Payments Contract with CHA.

This Chapter defines the types of eligible housing, CHA's policies, which pertain to initial inspections, lease requirements, owner disapproval, and the processing of Requests for Tenancy Approval (RFTA).

8.2. Request for Approval of Tenancy

The Request for Tenancy Approval (RFTA) must be submitted by the family during the term of the voucher. The family must submit the RFTA in the form and manner required by CHA as follows:

- All corresponding blanks on the RFTA form must be fully completed and legible, including the age of the building and the most recent rent charged;
- The form must be signed by both the owner and voucher holder;
- The family may not submit more than one RFTA at a time.
- The PHA will review the RFTA documents to determine whether or not they are approvable based on the following criteria:
 - The unit is an eligible type of housing under the program;
 - The rent to owner plus tenant paid utilities does not exceed the applicable payment standard for the bedroom size of the voucher issued to the family; or the rent requested meets the affordability test (does not exceed 40% of the households monthly adjusted income); and,
- The rent is reasonable in comparison to unassisted like units in the same location.

If CHA cannot approve the RFTA based on any of the above, CHA staff will contact the owner to determine if they are willing to negotiate within terms that would be approvable under the program requirements. If the owner and CHA are unable to reach acceptable terms, the voucher holder will be notified within 5 days and advised that the unit is not acceptable. The voucher holder will have the remaining period on their voucher to locate an acceptable unit. The voucher time will not be suspended or "tolled" during this period.

8.3. Eligible Types of Housing

Any of the following types of housing are eligible to be considered for assistance under the Housing Choice Voucher Program:

- All structure types: single family, duplex, multi-family, low rise or high-rise;
- Manufactured homes where the assisted family leases the mobile home and the pad;
- Group Homes or shared housing;
- Congregate and Assisted Living facilities (only the shelter rent is assisted);
- Single Room Occupancy facilities;
- Units owned by the PHA;
- Units being purchased by the assisted family in accordance with the HCV Homeownership criteria.

8.4. Lease Review

The family and owner must submit a standard form lease that is used for the owner's unassisted tenants at the premises. The terms and conditions of the lease must be consistent with State and local law. The lease must specify the name of the owner and the tenant; the address of the unit; the term of the lease; the amount of the total rent to the owner (contract rent) and, what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family.

The initial term of the lease agreement must be for a minimum of 12 months unless CHA approves a shorter term as a reasonable accommodation for a household with a disabled member or for the remaining term of of an existing lease when an first time voucher holder is leasing-in-place.

During the initial term of the lease, the owner may not raise the contract rent amount. Any provisions for renewal of the dwelling lease will be stated in the dwelling lease.

The HUD prescribed tenancy addendum, which is attached to the Housing Assistance Payments contract, as Part C, will always take precedence over any other terms and conditions in the owner's lease with the tenant. House rules of the owner may be attached to the lease as an addendum, provided they do not violate any fair housing provisions and do not conflict with the HUD tenancy addendum.

8.5. Actions before Lease Term

All of the following must always be completed before the beginning of the initial term of the lease for a unit:

- The unit has been inspected and meets all requirements of the federal Housing Quality Standards;
- The rent has been determined reasonable by CHA in accordance with rent reasonableness criteria; and
- CHA has approved leasing of the unit in accordance with all other program requirements.

Changes in Income Prior to Lease-Up – Changes in income that occur post-eligibility but pre-lease up shall be processed as follows:

- Tenant rent and HAP payments for the first month of the contract on a new unit shall be based on the income utilized to approve the affordability of the unit.
- Increases in income shall be processed prior to completion of the lease up to expand housing choice through increased affordability options.
- Decreases in income shall not be processed until the lease up process is complete.

8.6. Separate Agreements

Families and owners will be advised of the prohibition of illegal side payments for additional rent, or for items normally included in the rent of unassisted families, or for items not shown on the approved lease. However, owners and families may execute separate agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease if the agreement is in writing and approved by CHA.

The family is not liable under the lease for unpaid charges for items covered by separate agreements and nonpayment of these agreements cannot be cause for eviction. Any appliances, services or other items, which are routinely provided to unassisted families as part of the lease (such as air conditioning, dishwasher or garage) or are permanently installed in the unit, cannot be put under separate agreement and must be included in the lease. CHA will only approve a separate agreement if the family has the option of not utilizing the service, appliance or other item.

8.7. Information to Owners

Upon written request from a prospective property owner, CHA will provide the following information about a program applicant and/or participant.

- Current address as reflected in the file;
- Names, ages and relationship of household members;
- Former address if reflected in the file;

CHA will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of the CHA's policy on release of information to prospective landlords will be included in the briefing packet, which is provided to the family.

8.8. Contract Execution Process

The Housing Assistance Payments Contract will be effective on the first working day following the passed inspection or the date CHA approved the rent and lease agreement whichever is later.

If the tenant moves into the unit prior to the effective date of the HAP contract, the tenant shall be responsible for the full amount of the rent until the HAP contract becomes effective.

The Housing Assistance Payment Contract will be provided to owners as follows:

- CHA will send Part I of the HAP Contract via e-mail. The owner will be required to return the executed copy of Part I within 10 days from the transmission date.
- Part II of the HAP contract will be posted on the Landlord portal. Owners will be advised to read Part II of the HAP when Part I is transmitted.

Owners will be required to provide proof of ownership for the assisted unit in a form acceptable to CHA. The HAP contract will be executed in the name as indicated on the proof of ownership. If the owner has assigned an agent to represent the owner, then appropriate legal documentation must be provided prior to execution of the HAP contract.

If CHA fails to prepare the contract and schedule a contract signing prior to the approved lease effective date, housing assistance will be retroactive to the date the unit passed inspection or the lease effective date whichever is later. However, if the owner fails to return the executed Part I of the HAP contract, the housing assistance payment will be effective the first of the month following the month in which the owner actually signs the contract.

SECTION 9

HOUSING QUALITY STANDARDS AND INSPECTIONS

9.1. General

The Housing Quality Standards (HQS) are federal standards established by HUD that serve to measure the minimum quality of housing acceptable in the Housing Choice Voucher Program. HQS standards are utilized to inspect housing units at initial occupancy and during the term of the Housing Assistance Payments contract. HQS standards apply to the building and premises, as well as the unit. Newly leased units must pass the HQS inspection before the beginning date of the HAP contract. CHA will inspect each unit under contract at least biennially. CHA will also maintain a quality control inspection program, which will re-inspect a minimum of 5% of all inspections to assure consistency of enforcement of HQS.

This Chapter describes CHA's policies for performing HQS and other types of inspections, as well as standards for the timeliness of repairs. It also explains the responsibilities of the owner and family, and the consequences of non-compliance with HQS requirements for both families and owners.

9.2. Guidelines/Types of Inspections

Effort will be made at all times to encourage owners to provide housing above HQS minimum standards. However, CHA will not promote any additional acceptability criteria, which is likely to adversely restrict housing choice.

If the tenant is responsible for supplying the stove and/or the refrigerator, CHA will complete the initial inspection without the stove and refrigerator in the unit, provided that the family certifies that the appliances will be placed in the unit and will be in proper working order.

The following types of inspections will be conducted as required:

- **Annual** – a routine inspection conducted prior 12 months from the date of the last inspection.
- **Biennial Inspection** – a routine inspection conducted on a property 24 months from the date of the last inspection.
- **Re-inspection** – an inspection of a property which failed its annual inspection;
- **24-Hour Re-inspection** – an inspection on a property which had a failing item considered a life/safety hazard;
- **RTA/Initial** – inspection on a property which the tenant has selected and is requesting approval of a new unit;
- **Complaint** – inspection on a property which has been requested by the resident or other involved party due to perceived problems with the property;
- **Abatement Cure** – inspection on property where abatement has commenced but is still within the thirty-day window prior to termination;
- **Re-instatement inspection** – inspection in which the contract was terminated but a determination has been made to re-instate the contract;
- **QA (Quality Assurance)** – re-inspection by a supervisor of units previously inspected;
- **QA Re-inspection** – re-inspection on a failed QA;

9.3. Frequency of Inspections

CHA will conduct inspections at least every two years for all units under a Tenant Based Housing Choice Voucher HAP contract. CHA reserves the right to conduct annual inspections for units that required a reinspection on the last regularly scheduled inspection.

9.4. Timing of HQS Inspections

The chart below provides the general timelines that CHA will utilize in scheduling and conducting HQS inspections

Type of Inspection	To Be Scheduled	To be Completed
RTA/Initial	Within 48 hours from completion of rent negotiations	Within 72 hours from schedule.
Annual/Biennial	120 days prior to anniversary date of the last inspection	90 days prior to the anniversary date of the last inspection
Complaint	Within 24 hours from determination by CHA of a valid request.	Within 48 hours from schedule
Life/Safety Re-inspection	At initial inspection	Within 24 hours of initial inspection
Annual/Biennial Re-inspection	Upon notification by owner that the repairs have been completed by no later than 75 days prior to the anniversary date of the last annual/biennial inspection.	Within 60 days prior to anniversary date of the last annual/biennial inspection
Other Re-inspection	24 hours from written notification by landlord that unit is ready for re-inspection	Within 5 days from schedule.

The family must allow CHA to inspect the unit at reasonable times with reasonable notice. Reasonable hours to conduct an inspection are between 9:00 a.m. and 5:00 p.m., Monday through Friday. Notice will be provided to the family and landlord via first class mail a minimum of ten (10) days prior to the first attempt for an inspection. The notice will provide the specific date of the inspection and a four-hour window for the time of the inspection.

The family and/or the owner will be notified by telephone or e-mail of a scheduled life/safety re-inspection. Re-inspection notice for non-emergency items will be provided in the fail letter issued to the owner and the family.

Two attempts will be made for all inspection types. If access to the unit cannot be obtained after the second attempt, the unit will be considered in non-compliance with the HQS standards and appropriate action will be taken based on the inspection type.

Responsibility for access for annual/biennial inspections and any related required re-inspections is the responsibility of the assisted household and failure to provide access is a violation of the family obligations under the voucher contract. Access for all other inspection types is the responsibility of the owner.

Complaint Inspections – Participants may file a complaint inspection via telephone. Upon receipt of a request for a special inspection from a participant, CHA will complete the complaint inspection form and contact the property owner to determine if the tenant has notified the owner of the complaint.

If the owner is non-responsive after three attempts to contact; or, if upon contact indicates that they were not notified of a repair request, the owner will be provided with 10 days to resolve the complaint with their tenant prior to CHA scheduling an inspection. If after 10 days, the owner has not resolved the complaint, CHA will schedule a special complaint inspection.

9.4. Time Standards for Repairs

The owner must correct life/safety items, which endanger the family's health or safety, within 24 hours from the initial inspection. Non-emergency repairs must be made within 10 days from the date of an initial inspection or re-inspection and within 30 days from the date of all other inspections or re-inspections.

If a unit fails to comply with HQS at an initial inspection or re-inspection, the applicant will be notified to continue their search for housing within the time frame remaining on the voucher. If a unit fails to comply with HQS at any other inspection, actions will be taken as described below.

9.5. Modifications to HQS

CHA will use the federal Housing Quality Standards for acceptance of units under the Housing Choice Voucher Program. Any modifications or adaptations to a unit to permit a reasonable accommodation for a person with a disability must meet all applicable HQS requirements.

Additional acceptance standards will apply to mobile homes approved for participation in the HCV program. These standards are detailed in the appendix attached to this Administrative Plan.

9.6. Life/Safety Items

The following items shall be defined as life/safety items and must be corrected within 24 hours of the initial inspection.

- Lack of an operable smoke detector;
- Lack of an operable carbon monoxide detector if there any gas service in the unit;
- Ceiling damage reflecting imminent danger of falling;
- Major plumbing leaks resulting in flooding of the unit;
- Natural gas leaks or fumes;
- Electrical problems which could result in shock or fire;
- Non-operable HVAC when outside temperature is below 40 degrees Fahrenheit and temperature inside unit is below 62 degrees Fahrenheit.
- Lack of an operable toilet.
- Broken glass which creates an imminent danger to residents
- Obstacle which prevents tenant's entrance or exit

All life/safety items shall be considered the responsibility of the owner. The owner shall be responsible for issuing a lease violation notice and enforcement of the terms and conditions of the lease if they feel the existence of a life/safety fail item is due to the tenant violation of the lease.

If the life/safety item(s) are not corrected in the time period required the housing assistance payment will be abated in accordance with the procedures outlined further in this plan.

9.7. Determination of Responsibility for Repairs

The following HQS deficiencies are the responsibility of the family:

- Tenant-paid utilities not in service;
- Failure to provide or maintain family-supplied appliances;
- Damage to the unit or premises which is obvious as beyond normal wear and tear as documented by photos;
- Evidence of extensive rodent or insect infestation if a single-family structure and detailed in the lease agreement as lessee responsibility.
- Failure to maintain lawn and surrounding areas if a single-family structure and detailed in the lease agreement as lessee responsibility;
- Poor housekeeping habits that cause the unit to be unsanitary or unsafe for the family;

“Normal wear and tear” is defined as items which can be charged against the tenant security deposit under state law or court practice.

All other non- life/safety HQS violations shall be the responsibility of the owner including for vermin infestation in units other than single family units, even if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may take appropriate action in accordance with the terms of the lease.

9.8. Abatement and Contract Termination

Failure for a unit under contract to pass a re-inspection will result in abatement of the Housing Assistance Payment. Abatement means that a daily pro-ration of the Housing Assistance Payment will be deducted from any future payments for each day that the unit is not in compliance with the HQS standards. Abatement payments may be deducted from future HAP payments of the failed unit or any other HAP contract(s) that the owner has with CHA.

A notice of abatement will be sent to the owner informing them that abatement will commence effective the date of the inspection. The abatement period will end effective on the day following the date that the owner contacts CHA to advise that the repairs have been completed if the unit passes the re-inspection but shall never extend beyond 30 days.

If the owner has not made the required repairs during the abatement period, the Housing Assistance Payments contract will be terminated in accordance with the provisions of the contract. The contract termination date shall be the end of the month following the month in which the contract termination notice is issued.

The assisted family will be notified of the termination and will be advised to secure program move documents to commence search for a new housing unit. Once a termination notice has been issued, the HAP contract will not be re-instated (except as a reasonable accommodation) even if the landlord proceeds to make repairs.

If an owner has a history of not completing repairs and CHA is forced to terminate three or more HAP contracts in a twelve-month period, the owner will be prohibited from future participation in the HCV Program with CHA.

9.9. Consequences If Family Is Responsible

If violations of HQS are determined to be the responsibility of the family, CHA will require the family to make any repair(s) or corrections within 30 days unless such violations pose an immediate threat to the family's health and safety which shall include violations due to failure to maintain service for tenant paid utilities. In the case of violations that pose an immediate health and safety threat, CHA will take immediate action to terminate assistance. If the other repair(s) or correction(s) are not made within the 30-day required time period, CHA will terminate assistance to the family, for violation of their family obligations in accordance with the termination of assistance provisions detailed further in this Plan.

The owner's rent will not be abated for items which are the family's responsibility. If the tenant is responsible and corrections are not made, the HAP contract will terminate when assistance is terminated.

SECTION 10

RENT AND PAYMENT STANDARDS

10.1. General

It is CHA's responsibility to ensure that Payment Standards are sufficient to assure maximum program utilization, to provide program applicants and participants with adequate housing choice and to assure that the rents charged by owners at the time of initial lease up and at each annual re-certification are reasonable based upon unassisted comparable units in the rental market.

This Chapter explains CHA's policies for determination of rent-reasonableness, payments to owners, adjustments to the Payment Standards, and rent adjustments.

10.2. Initial Rent to Owner

CHA will review the following items to determine if the rent requested by the owner meets the program requirements as follows:

- The requested rent plus the cost of tenant paid utilities (calculated on the most recent program utility allowance schedule) cannot exceed the applicable payment standard; or,
- Total tenant payment cannot exceed 40% of the assisted family's monthly-adjusted income.
- The rent to owner must be reasonable in comparison to rent for other comparable unassisted units.

10.3. Making Payments to Owners

Once the HAP Contract is executed, CHA will commence processing payments to the landlord. All HAP payments will be made via direct deposit into an account designated by the property owner. Owners who do not wish to participate in the ACH direct deposit program will not be approved by CHA for participation in the program.

HAP contracts executed and returned by the 25th day of the month preceding the effective date will be processed for the first of the next month. Contracts received between the 25th and the last day of the month will not be processed for payment until the second month after receipt but will be retroactive to the first of the previous month.

Payment will be made on a master basis for all units under contract with a single property owner. Payments for different properties will only be processed if the owner provides a separate federal tax identification number.

10.4. Rent Reasonableness Determinations

A rent reasonableness test will be conducted to determine if the requested rent is reasonable in comparison to rent for other comparable unassisted units in the market. Rent reasonable tests will be conducted for the following:

- An initial rent requested on the RTA form;
- Prior to any increase in the rent to owner;
- If there is a five percent decrease in the published FMR 60 days before the contract anniversary;
- If directed by HUD; and,
- Based on a need identified by CHA.

At all times during the assisted tenancy, the rent to owner may not exceed the reasonable rent as most recently determined or re-determined by CHA. The owner will be advised that by accepting each monthly housing assistance payment s/he will be certifying that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises. If requested, the owner must provide CHA with information on rents charged by the owner for other units in the premises or elsewhere.

CHA will utilize an automated database system for determination of rent reasonableness. The database will include market rental data for unassisted units to complete a rent comparability analysis. Data utilized will include:

- Location by zip code and census tract;
- Number of Bedrooms and bathrooms;
- Other identifiable amenities;
- Type and age of structure; and
- Tenant paid utilities.

CHA will identify comparable units that are most consistent with the unit for which the comparability analysis is being conducted. A minimum of two similar units will be identified and the corresponding data will be reflected on the automated rent reasonableness form.

This data will be compared with the requested rent for the assisted unit. If the requested rent is greater than the comparable units selected, CHA will negotiate with the owner to reach an agreed upon rent amount that meets the rent reasonable test. If the rent is less than the comparable, CHA will approve the rent increase.

10.5. Payment Standards for the Voucher Program

The Payment Standard is used to calculate the maximum subsidy and the housing assistance payment for a family and is based on Fair Market Rents (FMR) published by HUD on an annual basis.

CHA will maintain the payment standards within the HUD established range of the published FMR. CHA will review and analyze the payment standards on an annual basis when the new FMR's are published. If CHA's current payment standards remain within the HUD established range (minimum of 90% and a maximum of 110%) of the newly published FMR's, the payment standards will not be adjusted.

When reviewing the payment standard on an annual basis, CHA will consider the available budget authority and determine if an increase is needed to improve leasing success rates or a reduction in payment standards is needed including an amount below 90% of the published FMR, to assist a maximum number of households up to CHA's baseline allocation. If it is determined that payment standards below 90% of FMR is needed, a waiver will be secured from HUD with corresponding justification.

On a case by case basis, as a reasonable accommodation, HCV staff may approve a payment standard amount up to 110% of the published FMR if CHA's payment standards are set below 110% of the FMR. Such higher payment standard must be requested by the family and subsequently approved, as necessary, by CHA after a family with a disabled person or an individual person with disabilities locates an otherwise approvable unit. If needed, the HCV Director may approve the use a payment standard up to 120% of the FMR for units with special features required to meet the needs of the person(s) with disabilities.

10.6. Increases in Owner Rent

Rent increases to owners will only be considered at the time of annual re-certification of the assisted family. Owners must submit a request for a rent increase at least 60 days prior to the anniversary date of the lease.

Any changes in the rent requested by the owner must comply with all provisions of the rent reasonableness requirements.

Rent increases for rent restricted rental units receiving an indirect subsidy from another government source (Department of Agriculture, Low Income Housing Tax Credits under the IRS, etc.) will be processed when a project wide rent increase has been approved by the assigned oversight agency for these properties. CHA will approve a rent for the tenant-based vouchers in these properties that is equivalent to the market rate rent approved by the corresponding agency. If these properties have no market rate units, CHA will approve rent for tenant-based vouchers equal the highest restricted rent for the applicable unit size and type in the property.

SECTION 11

RE-CERTIFICATIONS

11.1. General

CHA will reexamine the income and household composition of all assisted families at least annually. Families will be provided accurate annual and interim rent adjustments. Re-certifications and interim examinations of income will be processed in a manner that ensures families are given reasonable notice of rent increases.

This Chapter defines CHA's policy for conducting annual re-certifications and coordinating annual activities. It also explains the interim reporting requirements for families, and the standards for timely reporting.

11.2. Re-certification

Streamlined Recertifications – CHA will streamline the income determination process for family members with fixed sources of income. Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

CHA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources and document in the file how the determination that a source of income was fixed was made. If verification of the COLA or rate of interest is not available, CHA will obtain third-party verification of income amounts. Third-party verification of fixed sources of income will be obtained at least once every three years thereafter.

Annual Recertifications - Annual Recertification will be conducted for all other households. Once each year, CHA will mail notification to the assisted unit address of the requirements to complete their annual re-certification. CHA will not issue any mail to an address (such as a P.O. Box or mail center) other than the assisted unit address and it is the responsibility of the family to assure that mail can be delivered at the assisted unit.

Instructions for completion of the annual recertification will be provided in the re-certification notice including a date by which the recertification must be completed.

If the family does not complete re-certification packet by the stated deadline, a proposed termination of assistance notice will be issued to the family. If the family completed the recertification by the expiration date of the time limit stated in the proposed termination notice, to request a hearing, the termination action will be suspended.

Timing of Rent Change – Changes in tenant rent shall take effect on the first of the month following CHA's completion of the annual recertification process except in the following circumstances:

- If the family causes a delay in the reexamination processing, there will be a retroactive increase in rent to the scheduled effective date of the annual re-certification.

- If CHA caused a delay in the reexamination processing, the increase in rent shall take effect on the effective date of the annual re-certification or after providing a 30 day notice to the participant of the increase.
- Decreases in rent shall always take effect the first of the month following completion of the annual recertification, regardless of the annual recertification effective date.

11.3. Interim Re-certifications

Zero Income Households – If a family completes a zero-income survival statement at the time of the annual re-certification and later obtains other income, they must report the new income within 30 days from the date it becomes effective and an interim re-certification will be conducted.

Changes in Employment – If a household member is not employed at the time of annual re-certification but later obtains a job; or, if a household member obtains an additional job, the family must report the new or additional employment within 30 days from the date of starting work and an interim recertification will be completed. Other changes in employment income such as a different job or an increase in salary at an existing job do not need to be reported and if reported, an interim re-certification will not be conducted.

Other Changes in Income – Other changes in income such as current Social Security and Disability will not need to be reported and if reported, file will be noted it was received and an interim recertification will not be completed. If the Social Security is newly started, stopped or is being reinstated an interim recertification will be completed. All changes in income will need to be reported with the annual recertification and 90 Day Zero Income Survival recertification.

Decreases in Income – Participants may choose to report a decrease in income and other changes, which would reduce the amount of tenant rent, such as an increase in allowances or deductions. If these changes are reported and it will result in a change in tenant rent, an interim re-certification will be completed.

Effective Date – If changes in rent for interim re-certification would result in a decrease of tenant rent, the change will become effective the first of the month after the change was reported provided all documentation was received prior to the 25th day of the month. If documentation is not received until after the 25th day of the month, the rent decrease will take effect the first of the second month after receipt of all documentation.

If changes in rent for interim recertification would result in an increase of tenant rent, the change will become effective the first of the second month following the month in which the change occurred.

11.4. Income Changes Resulting from Welfare Program Requirements

Decreases in income resulting from changes or discontinuance of welfare benefits will be processed as follows:

- Tenant rent will not be decreased if welfare assistance is reduced because of fraud, failure to participate in an economic self-sufficiency program, or noncompliance with a work activities requirement.

- Tenant rent will be decreased if welfare assistance is reduced because of the expiration of a lifetime time limit on receiving benefits or a situation where the family has complied with welfare program requirements but cannot or has not obtained employment.

SECTION 12

PROGRAM MOVES AND PORTABILITY

12.1. General

HUD regulations permit families to move with continued assistance to another unit within CHA's jurisdiction, or to a unit outside of CHA's jurisdiction under the program portability provisions. The regulations also allow discretion to develop policies, which define any limitations or restrictions on moves.

This Chapter defines the policies for moves, both within and outside of CHA's jurisdiction, and the policies for restriction and limitations on moves.

12.2. Permissible Moves

Voluntary Moves – Assisted households will only be permitted to exercise a move on a voluntary basis once each year. Families must complete all requirements of an annual recertification prior to a voluntary move. Upon completion of the recertification, the family will be scheduled for a Program Move briefing. Attendance at the briefing is mandatory and a Program Move voucher will only be issued upon completion of the briefing.

Mandatory Moves – Mandatory moves may be initiated any time for the following reasons:

- The Housing Assistance Contract is terminated by CHA for the owner's failure to comply with HQS or other terms of the contract;
- The owner has commenced an action to terminate the family's lease through no fault of the family;
- A household member is newly diagnosed with a disability, which requires a reasonable accommodation.

CHA's notice to the owner of termination of a HAP contract will include notification of the participant's intent to vacate the property and will be considered proper 30-day notice. The owner shall be responsible for assuring compliance with all provisions of the lease agreement and applicable state laws as they relate to security deposits. Failure to comply with these provisions could result in prohibition of future participation in the HCV Program.

12.3. Portability

Applicants must reside within the jurisdiction of CHA for a period of one year prior to exercising portability options. Portability applies to families moving out of or into CHA's jurisdiction from another geographic location. Within the limitations of the regulations and this policy, a participant family has the right to receive tenant-based voucher assistance to lease a unit anywhere in the United States where a Public Housing Authority operates a tenant-based assistance program.

To "port" to a jurisdiction outside of CHA, the family must be income eligible under the income limits of the jurisdiction to which they intend to port during the initial 12-month period after admission to the program.

If a family desires to “port” to a jurisdiction with substantially higher (20% greater) payment standards, CHA will work with the receiving PHA to determine their ability to absorb the family. CHA will approve all port requests when the receiving PHA is able to absorb the family. CHA will only deny a request to “port” to a higher cost area if CHA would be unable to avoid termination of housing choice assistance for current participants during the calendar year in order to remain within its budgetary allocation (including any HAP reserves) for housing assistance payments.

If a family requests portability, the location where they intend to port must be identified in the request. CHA will contact the “receiving” PHA in that jurisdiction and advise them of the family’s intent. A voucher and corresponding portability documents will be issued to the family.

CHA will absorb all incoming portable families provided there is funding available. A CHA voucher will be issued to the incoming family for the period of time remaining on the voucher issued by the initial PHA. CHA will notify the initial PHA of their action to absorb the voucher. All incoming voucher holders must attend a new admissions program briefing. If funding is not available, CHA will administer the voucher on behalf of the initial PHA.

CHA will not permit families to exercise portability if there exists grounds to deny a move because of the family’s action or failure to act including violations of family obligations under their Housing Choice Voucher; the family owes money to CHA; or, the family has vacated the assisted unit in violation of the lease agreement.

Prior to denial of a portability move, CHA will determine if there is a need for a reasonable accommodation or an exception under the provisions of VAWA.

12.4. Billing Procedures

The receiving PHA is responsible for billing CHA for 100% of the Housing Assistance Payment and 80% of the HUD pro-rated Administrative Fee (at CHA’s rate) for each “Portability” Voucher leased as of the first day of the month. CHA will not issue payment until an invoice is received by the receiving PHA within the time limits established by HUD. Late billings will not be processed for payment and the Receiving PHA will be so notified.

If CHA does not receive an updated HUD 50058 within 30 days after the effective date of a required annual recertification, CHA will send a letter to the receiving PHA to verify the status of the family with a copy sent to the Columbia HUD office. If the receiving PHA does not respond to CHA’s request on the status of the family within 30 days from the date of the written request, CHA will submit a request to the Columbia HUD office that HUD require the receiving PHA absorb the voucher(s) in question.

CHA will continue to make the monthly payment based on the most recently received 50058 until otherwise instructed by HUD.

SECTION 13

CONTRACT TERMINATIONS

13.1. General

The Housing Assistance Payments (HAP) Contract is the contract between the owner and CHA, which defines the responsibilities of both parties.

This Chapter describes the circumstances under which the contract can be terminated by CHA and by the owner, and the policies for such terminations.

13.2. Contract Termination

The term of the HAP Contract is consistent with the term of the lease. The HAP Contract may be terminated by CHA, or by the owner, or may terminate automatically if the tenant vacates the contract unit.

No future subsidy payments on behalf of the family will be made to the owner after the month in which the contract is terminated. However, the owner may retain the housing assistance payment for the month in which the unit was vacated.

If the family continues to occupy the unit after the HCV contract is terminated, the family is responsible for the total amount of rent due to the owner.

After a contract termination, if the family meets the criteria for a program move, the family may utilize their voucher in another unit.

13.3. Termination of Tenancy by the Owner

If the owner wishes to terminate the lease, the owner is required to provide proper notice as stated in the lease. During the term of the lease, the owner may not terminate the tenancy except for the following grounds.

- Serious or repeated violations of the lease, including but not limited to failure to pay rent or other amounts due under the lease, or repeated violation of the terms and conditions of the lease;
- Other good cause because of something the family did or failed to do.

The owner must provide the tenant a written notice specifying the grounds for termination of tenancy, before the commencement of any eviction action. The notice may be included in, or may be combined with, any owner eviction notice to the tenant. The owner eviction notice means a notice to vacate, or a complaint, or other initial pleading used under State or local law to commence an eviction action.

If the owner has begun eviction and the family continues to reside in the unit, CHA will continue to make housing assistance payments to the owner until the owner has obtained a court judgment or other process allowing the owner to evict the tenant and the tenant has vacated the assisted unit. By receipt of the housing assistance payment, the owner certifies that the tenant is still in the unit, the rent is reasonable and she/he is in compliance with the contract.

If an eviction is not due to a serious or repeated violation of the lease, and if CHA has no other grounds for termination of assistance, CHA will issue a program move packet so that the family can move with continued assistance.

13.4. Termination of the Contract by CHA

The HAP contract terminates automatically when the family vacates the unit regardless of cause. The HAP contract will also terminate automatically if the assistance to the family is terminated; funding is no longer available under the ACC contract with HUD; or 180 days have passed since the last housing assistance payment to the owner.

Notification will be provided to the owner and the tenant in accordance with the requirements of the HAP contract when action is taken by CHA to terminate the contract. The effective termination date will be the end of the month in which the notification was provided to the owner.

SECTION 14

DENIAL OR TERMINATION OF ASSISTANCE

14.1. General

CHA will deny or terminate assistance for a family because of the family's action or failure to act. The Voucher is the legal contractual document between CHA and the assisted family and specifies the Family Obligations under the program and the grounds under which CHA can deny or terminate assistance. The Family is also provided with written procedures for informal hearings at the time of their briefing and in the letter of proposed termination.

This Chapter describes when CHA is required to deny or terminate assistance; the policies for the denial of a new commitment of assistance; and, the grounds for termination of assistance under an outstanding HAP contract.

14.2. Denial/Termination

If denial or termination is based upon behavior resulting from a disability, CHA will delay the denial or termination in order to determine if there is an accommodation, which would negate the behavior resulting from the disability.

Denial of assistance for an applicant may include any or all of the following:

- Denial for placement on the waiting list;
- Denying a voucher or withdrawing a voucher;
- Refusing to enter into a HAP contract or approve a tenancy;
- Refusing to process or provide assistance under portability procedures;

Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a tenancy;
- Terminating housing assistance payments under an outstanding HAP contract;
- Refusing to process or provide assistance under portability procedures.

14.3. Mandatory Denial and Termination

In accordance with federal regulations, CHA must deny assistance to applicants, and terminate assistance for participants for the following reasons:

- If any member of the family fails to sign and submit to HUD or CHA required consent forms for obtaining information;
- If no member of the family is a U.S. citizen or eligible immigrant;
- If the family is under contract and 180 days have elapsed since the last housing assistance payment was made;
- Persons convicted of manufacturing or producing methamphetamine in violation of any Federal or State law;
- A member of the household is subject to a lifetime registration requirement under a State sex offender registration program.
- A participant family is evicted by through legal court action from housing assisted under the program for serious violation of the lease.

14.4. Grounds for Denial or Termination of Assistance

In addition to the above mandatory reasons for denial and/or termination of assistance, CHA will deny program assistance to an applicant or terminate assistance to a participant for any of the following reasons:

- The family violates any family obligation under the program as listed in 24 CFR 982.551;
- If any member of the family commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- The family currently owes rent or other amounts to CHA or to another PHA in connection with HCV or public housing assistance under the 1937 Act;
- The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
- The family participating in an FSS program fails to comply, without good cause, with the family's FSS contract of participation;
- The family has engaged in or threatened abusive or violent behavior toward CHA personnel;
 - ✓ "Abusive or violent behavior towards CHA personnel" includes verbal as well as physical abuse or violence. Use of expletives that are generally considered insulting, racial epithets, or other language, written or oral, that is customarily used to insult or intimidate.
 - ✓ "Threatening" refers to oral or written threats or physical gestures that communicate an intent to abuse or commit violence.
 - ✓ Actual physical abuse or violence.
- A member of the family's drug or alcohol abuse interferes with the health, safety or peaceful enjoyment of other project residents;
- If any member of the family has been convicted of a violent criminal activity or a felony within the past five years.

Violent criminal activity – includes any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or property as evidenced by action taken by a law enforcement agency.

Covered person – means a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

Guest – means a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent. A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.

A family may request an exception to this policy for valid reasons. However, an exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return.

Other person under the tenant's control – means that the person, although not staying as a guest (as defined in this chapter) in the unit, is, or was at the time of the activity in question, on the premises because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

Standard for Violation – CHA will deny participation in the program to applicants and terminate assistance to participants in cases where a household member has been convicted of a drug related felony.

Violent Criminal Activity – means any by an applicant or participant or household member which involved criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage, which resulted in the conviction of the applicant, participant, or household member.

14.5. Family Obligations

All obligations of the family are explicitly stated on the Housing Choice Voucher form which serves as the contractual document between CHA and program participants.

These obligations are discussed in detail with program participants at the mandatory briefing sessions prior to admission to the program. Violation of any of these family obligations will be grounds for termination of assistance.

14.6. Notice of Termination of Assistance

CHA will provide a written notice of proposed termination of housing assistance, which will include the following information:

- The family obligation that has been violated;
- The specific action(s) which occurred in violation of the family obligation;
- The effective date of the proposed termination,
- The family's right, if they disagree, to request an Informal Hearing to be held prior to termination of assistance; and,
- The date by which a request for an informal hearing must be received by CHA.

CHA will provide a copy of the proposed termination to the owner. The owner will also be copied on the final outcome of the termination action and if the family's housing assistance is terminated, the HAP contract with the owner will also terminate effective the last day of the month in which the housing assistance was terminated.

14.7. Required Evidence

CHA will pursue fact-finding efforts as needed to obtain evidence for termination of assistance. Pending termination actions will be based on the following rules of evidence:

Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole show that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence can be considered credible evidence. Other credible evidence includes documentation of drug raids or arrest warrants.

14.8. Confidentiality of Criminal Records

CHA will utilize a third-party vendor that owns and manages a national web-based criminal screening system to conduct criminal background reviews for each adult household member. A notification of pass or fail will be the only document maintained in the participant file. Electronic copies of the detailed criminal reports will be maintained in the data system of the third-party vendor for a limited period. Upon disposition of all proposed terminations related to criminal activity, the electronic records will be deleted.

Criminal data related to applicants will be secured and maintained using the same system described above. Data for applicants will be maintained until any pending denial of assistance action is completed. At that time, the data will be deleted from the electronic database.

14.9. Housing Authority Discretion

In deciding whether to deny or terminate assistance because of action or failure to act by members of the family, CHA will consider all of the circumstances in each case, including the seriousness of the case. CHA will use its discretion in reviewing the extent of participation or culpability of individual family members and the length of time since the violation occurred.

14.10. Lease Violations

The following criteria will be used to decide if a serious or repeated violation of the lease will result in termination of assistance:

- If the owner terminates tenancy through court action for serious or repeated violation of the lease;
- If the owner notifies the family of termination of tenancy for serious or repeated lease violations, and the family moves from the unit prior to the completion of court action;
- Nonpayment of rent will always be considered a serious violation of the lease.

14.11. Notification of Eviction

If the family requests program move documents and an eviction is pending, CHA will not issue program move papers. However, if the program move papers are issued because CHA was not informed of the pending eviction and subsequently becomes informed, CHA will not approve a new tenancy. The voucher will be withdrawn until such time that a determination is made as to the household's violation of family obligations.

14.12. Proposed Additions to the Family

CHA will deny a family's request to add additional family members who are:

- Persons who have been evicted from public housing;
- Persons who have previously violated a family obligation listed in 24CFR 982.51 of the HUD regulations;
- Persons who have been part of a family whose assistance has been terminated under the Section 8 program;

- Persons who commit fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- Persons convicted of a felony within the past five years;
- Persons who currently owe rent or other amounts to CHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act; or
- Persons who have engaged in or threatened abusive or violent behavior toward PHA personnel.

14.13. Limitation on Profit-Making Activity in Unit

Families are encouraged to use the assisted unit for legal profit-making ventures provided that the owner and CHA have approved such use at the time of initial lease up and such use is in compliance with all State and local laws and ordinances. However, if the business activity is conducted without property licensing or compliance with state and local laws or results in the inability of the family to use any of the critical living areas, such as a bedroom, utilized for a business which is not available for sleeping, it will be considered a violation of the family obligations and appropriate action will be taken.

14.14. Missed Appointments and Deadlines

It is a Family Obligation to supply information, documentation, and certification as needed for CHA to comply with HUD regulations and fulfill its administrative responsibilities. CHA schedules appointments and sets deadlines in order to obtain required information. The Obligations also requires that the family allow CHA to inspect the unit, and appointments are made for this purpose.

An applicant or participant who fails to keep an appointment, or to supply information required by a deadline, may be sent a Notice of Denial or a Proposed Termination of Assistance. The family will be given information about the requirement to keep appointments and the number of times appointments will be rescheduled, if any, in accordance with the various provisions of this Plan.

The only acceptable reasons for missing appointments or failing to provide information by deadlines are medical emergencies or official detainment.

Family obligations are clearly explained to the family and it is expected that the assisted family will comply with these obligations. Thus, CHA will provide families with only a single opportunity to meet program requirements before being issued a notice of proposed termination or denial for breach of a family obligation.

After issuance of the proposed termination notice, if the family cures the breach of their family obligation within the time allowed for requesting a hearing, the notice will be rescinded and no further action will be taken.

SECTION 15

OWNER PROHIBITIONS AND RESTRICTIONS

15.1. General

It is the policy of CHA to recruit owners to participate in the Voucher program. CHA will provide owners with prompt and professional service in order to attract an adequate supply of available housing for rent under the HCV program. Federal regulations define when CHA must prohibit an owner from participating in the program, and when CHA has the discretion to disapprove or otherwise restrict the participation of owners in certain categories.

This Chapter describes the criteria for owner disapproval, and the various penalties for owner violations.

15.2. Disapproval of Owner

Owners participate in the HCV Program at will and do not have a right of participation. For purposes of this section, “owner” includes a principal, management agent or any other party acting on behalf of an owner.

CHA will prohibit the participation of property owners for any of the following reasons:

- The owner has been disbarred, suspended, or subject to a limited denial of participation under 24 CFR part 24;
- An administrative or judicial action has been instituted against the owner for violation of the Fair Housing Act or other federal equal opportunity requirements and such action is pending investigation and/or resolution;
- A court or administrative agency has determined that the owner has violated the Fair Housing Act or other federal equal opportunity requirements;
- The owner has violated obligations under a housing assistance payments contract under Section 8 of the 1937 Act (42 U.S.C. 1437f);
- The owners owes CHA or any other PHA money;
- The owner has committed fraud, bribery or any other corrupt act in connection with any federal housing program;
- The owner has been convicted of a felony within the past five years or has been convicted of a methamphetamine crime at any time or is a registered sex offender;
- The owner has a history or practice of non-compliance with HQS for units leased under the Section 8 programs or any other federal housing program;
- The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity by the tenant, any member of the household, a guest or another person under the control of any member of the household that:
 - ✓ Threatens the right to peaceful enjoyment of the premises by other residents;
 - ✓ Threatens the health or safety of other residents, or of owner employees or other persons engaged in management of the housing;
 - ✓ Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises;
 - ✓ Is convicted of a felony while residing in the unit;

- The owner has not paid State or local real estate taxes, fines, other fees or assessments.
- The owner has failed to comply with regulations, the mortgage or note, or the regulatory agreement for projects with mortgages insured by HUD or loans made by HUD.

15.3. Restriction of Immediate Family Members

CHA is prohibited from approving a Housing Assistance Contract with an owner that is the parent, child, grandparent, grandchild, sister or brother of any member of the household to be assisted. However, this provision may be waived as a reasonable accommodation for a family member who is a person with a disability, provided that the assisted household has made reasonable efforts to locate other suitable housing and has been unsuccessful.

In cases where the owner and tenant bear the same last name, CHA will require the family and owner to certify whether they are not related to each other in any way. Failure to disclose relationship will be considered fraud and grounds for termination of tenancy and prohibition of future program participation by the owner.

15.4. Owner Restrictions and Penalties

If an owner has committed fraud or abuse or is guilty of frequent or serious contract violations, CHA will restrict the owner from future participation in the program for a period of time commensurate with the seriousness of the offense. CHA may also terminate any additional Housing Assistance Contracts with the owner.

Before imposing any penalty against an owner, the PHA will review all relevant factors pertaining to the case, and will consider such factors as the owner's record of compliance and the number of violations.

15.5. Ownership Requirements

Landlords will be required to provide proof of ownership prior to execution of a Housing Assistance Contract. Acceptable documentation may include a Real Estate Act of Sale; the property deed or title; or other acceptable legal documentation. Utility bills, insurance documents or other such documents will not be considered sufficient evidence of ownership.

Landlords will also be required to provide proof that the mortgage on the property is current and that real estate taxes have been paid prior to execution of a HAP contract. Failure to provide proof of payment will result in cancellation of the proposed action. If the tenant has moved into the unit prior to CHA approval of the HAP contract, the tenant will be responsible for the full amount of the rent.

The Housing Assistance Payments Contract will be executed in the format as indicated on the proof of ownership. Ownership by more than one individual will require execution of all parties or appropriate legal documentation such as power of attorney, which designates a single individual to act on behalf of all owners.

Designation of a management agent or other payee will be approved with appropriate legal documentation signed and notarized by all owners of the property.

CHA will approve the assignment and transfer of a HAP contract to a new owner at the request of an owner of record. The change of ownership will be processed upon written request accompanied by appropriate documentation showing the transfer of title and recorded deed or a last will and testament identifying an executor, along with a death certificate for the owner of record.

SECTION 16

OWNER OR FAMILY DEBTS

16.1. General

This chapter describes the CHA's policies for the recovery of monies, which have been overpaid for families, and to owners. It describes the methods that will be utilized for collection of monies and the guidelines for different types of debts. It is CHA's policy to meet the informational needs of owners and families, and to communicate the program rules in order to avoid owner and family debts. Before a debt is assessed against a family or owner, the file must contain documentation to support CHA's claim that the debt is owed. The file must further contain written documentation of the method of calculation, in a clear format for review by the owner; the family or other interested parties.

When families or owners owe money to CHA, every effort will be made to collect it. CHA will use a variety of collection tools to recover debts including, but not limited to Requests for lump sum payments; Civil suits; Payment agreements; Abatements; Reductions in HAP to owner; Collection agencies; Credit bureaus; and, Income tax set- off programs.

16.2. Family Debts

Family debts may result from a single act or pattern of actions that:

"Constitutes false statement, omission, or concealment of a substantive fact that results in over-payment of housing assistance."

Failure to report changes in family income within 30 days from the date of the change in income, shall result in a debt assessed to the family for the overpayment of Housing Assistance application to the increased income.

CHA will only permit repayment agreements for the following circumstances:

1. A Public Housing household that is transferred to the Housing Choice Voucher Program as the result of a demolition or disposition action taken by CHA and approved by HUD, shall be permitted a repayment agreement for any remaining Public Housing debts owed upon completion of the transfer.
2. A Housing Choice Voucher participant that is required to move due to a mandatory transfer for Housing Quality Standards violations and the landlord refuses to make the required repairs shall be permitted a repayment agreement for any debt owed for the unit from which they are required to move.
3. If a household member of a Housing Choice Voucher participant becomes newly disabled and moves to another unit to meet the needs of the disabled individual, a repayment agreement will be permitted for any debt owed for the unit vacated.

Terms of Repayment Agreement:

- Repayment agreements require an initial payment of 20% of the total debt owed upon execution of the agreement.
- The remaining balance owed shall be equally divided into no more than six monthly installments.

- Payments shall be due by the 15th day of each month.
- Failure to make a payment shall result in issuance of a proposed termination of assistance pursuant to the provisions detailed further in this plan.

Families who owe money to CHA due to unreported income will be issued a proposed termination of assistance pursuant to the provisions detailed further in this plan. The family may, at the sole discretion of the CHA Hearing Officer, be permitted a limited time not to exceed the end of the second month following the date of the hearing, to make payment in full for any excess housing assistance payment due and payable to CHA as the result of unreported income.

If a family owes an amount, which equals or exceeds \$2,500 as a result of program fraud, CHA will refer the case for criminal prosecution and to the HUD Inspector General. CHA will take all action available under federal and state laws to collect any debt owed.

16.3. Owner Debts to CHA

If CHA determines that the owner has retained housing assistance payments the owner is not entitled to, CHA will reclaim the amounts from future housing assistance owed the owner for any units under contract.

If future housing assistance is insufficient to reclaim the amounts owed, CHA will require the owner to pay the amount in full within 30 days from notification. If the owner fails to pay the amount owed within the specified time period, CHA will pursue collections through the local court system and restrict the owner from future program participation.

16.4. Writing off Debts

Debts owed to the HCV Program from program participants or owners will be reviewed each year to determine if such debts are valid and collectible. Debts will be written off if:

- The debtor's whereabouts are unknown and the debt is more than 3 years old;
- A determination is made that the debtor is judgment proof;
- The debtor is deceased;
- The debtor is confined to an institution indefinitely or for more than 3 years; or,
- The amount is less than \$100.00 and the debtor cannot be located.

SECTION 17

COMPLAINTS AND APPEALS

17.1. General

The informal hearing requirements defined in HUD regulations are applicable to participating families who disagree with an action, decision, or inaction of the CHA.

This chapter describes the policies to be used when families disagree with a CHA decision. The requirements are explained for informal reviews and hearings. It is the policy of the CHA to ensure that all families have the benefit of all protections due to them under the law.

17.2. General Complaints

CHA will respond promptly to complaints from families, owners, employees, and members of the public. All complaints must be provided to CHA in writing with the exception of complaints regarding HQS life-safety violations. Program participants may report HQS life-safety violations via telephone.

17.3. Informal Review for Applicants

Informal reviews apply to applicants: those families for which a Housing Assistance Payments contract has not yet been executed.

The CHA will provide applicants with the opportunity for an informal review of decisions denying the following actions:

- Listing on or removal from the waiting list;
- Issuance of a voucher;
- Participation in the program; and,
- Assistance under portability procedures.

When CHA determines that an applicant is ineligible for the program, the family will be notified of their ineligibility in writing. The notice will contain:

- The reason(s) they are ineligible;
- The procedure for requesting a review if the applicant does not agree with the decision; and,
- The time limit for requesting a review.

When denying admission for criminal activity CHA will provide the subject of the record and the applicant with a copy of the criminal record upon which the decision to deny was based. It will be the responsibility of the applicant to resolve any incorrect information reported in the criminal report.

Informal reviews are not required and will not be provided for established policies and procedures and CHA determinations such as:

- Discretionary administrative determinations by the CHA
- General policy issues or class grievances

- A determination of the family unit size under the CHA subsidy standards
- Refusal to extend or suspend a voucher
- A CHA determination not to grant approval of the tenancy
- Determination that unit is not in compliance with HQS
- Determination that unit is not in accordance with HQS due to family size or composition

17.4. Procedure for Review

A request for an informal review must be received in writing by the close of the business day, no later than 10 days from the date of CHA's notification of denial of assistance. The informal review will be scheduled within 30 days from the date the request is received.

All reviews will be conducted by an individual other than the person who rendered the original decision.

In order to expedite the review and provide improved service to customers, CHA will encourage the review to be conducted by telephone if acceptable to the applicant. The applicant will be given the option of presenting oral or written objections to the decision. Both the CHA and the family may present evidence and witnesses. The family may use an attorney or other representative to assist them at their own expense.

A notice of the review findings will be provided in writing to the applicant within 30 days after the review. It shall include the decision of the review officer, and an explanation of the reasons for the decision. All requests for a review, supporting documentation, and a copy of the final decision will be retained in the family's file.

17.5. Informal Hearings for Participants

Hearings are only available to program participants. Participants are households in which a HAP contract has been executed. Prior to execution of the HAP contract, all households are considered applicants and are only entitled to a review as described above. Hearing procedures will be provided to families in the briefing packet at the time of issuance of the voucher.

CHA will provide participants with prompt notice of determinations, which will include:

- The proposed action or decision of the CHA;
- The date the proposed action or decision will take place;
- The family's right to an explanation of the basis for the CHA's decision.
- The procedures for requesting a hearing if the family disputes the action or decision;
- The time limit for requesting the hearing.

All notices and correspondence related to hearings will be mailed to the address of the unit approved under the HAP contract and to one additional address if an additional address has been provided to CHA.

CHA will provide participants with the opportunity for an informal hearing for decisions related to any of the following determinations. The opportunity for an informal hearing will be provided before termination of assistance.

- Determination of the family's annual or adjusted income and the computation of the housing assistance payment;
- Determination to terminate assistance for any reason; and,
- Determinations to terminate a family's FSS contract, withhold supportive services, or propose forfeiture of the family's escrow account.

Informal hearings are not required for established policies and procedures and CHA determinations such as:

- Discretionary administrative determinations by the CHA
- General policy issues or class grievances
- Establishment of the CHA schedule of utility allowances for families in the program
- A CHA determination not to approve an extension or suspension of a voucher term
- A CHA determination not to approve a unit or lease
- A CHA determination that an assisted unit is not in compliance with HQS unless the non-compliance is the result of family obligations
- A CHA determination to exercise or not exercise any right or remedy against the owner under a HAP contract

17.6. Notification of Hearing

A request for a hearing must be received in writing by the close of the business day, no later than 10 days from the date of the CHA's notification of proposed termination. The hearing will be scheduled within 30 days from the date the request is received. All hearings will be conducted by an individual other than the person who rendered the original decision. The notice of proposed termination shall include the following information:

- The date and time of the hearing;
- The location where the hearing will be held;
- The family's right to bring evidence, witnesses, legal or other representation at the family's expense;
- The right to view any documents or evidence in the possession of the CHA upon which the CHA based the proposed action and, at the family's expense, to obtain a copy of such documents prior to the hearing.
- A notice to the family that the CHA will request a copy of any documents or evidence the family will use at the hearing.

Requests for documents or evidence must be received by each party no later than 10 days before the scheduled hearing date.

17.7. Hearing Procedures

After a hearing date is confirmed, the family may request to reschedule only upon showing "good cause," which is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. If a family does not appear at a scheduled hearing and has not rescheduled the hearing in advance, the family must contact the CHA within 24 hours, excluding weekends and holidays. The CHA will reschedule the hearing only if the family can show good cause for the failure to appear.

Families have the right to:

- Present written or oral objections to the CHA's determination;
- Examine the documents in the file which are the basis for the CHA's action, and all documents submitted to the Hearing Officer;
- Copy any relevant documents at their expense;
- Present any information or witnesses pertinent to the issue of the hearing;
- Request that CHA staff be available or present at the hearing to answer questions pertinent to the case; and
- Be represented by legal counsel, advocate, or designated representatives at their own expense.

If the family requests copies of documents relevant to the hearing, the CHA will make the copies for the family and assess a charge of \$.25 per copy. In no case will the family be allowed to remove the file from the CHA office.

In addition to other rights contained in this Chapter, the CHA has a right to:

- Present evidence and any information pertinent to the issue of the hearing;
- Be notified if the family intends to be represented by legal counsel, advocate, or another party;
- Examine and copy any documents to be used by the family prior to the hearing;
- Have its attorney present; and
- Have staff persons and other witnesses familiar with the case present.

The hearing shall concern only the issues for which the family has received the opportunity for hearing. Evidence presented at the hearing may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings. No documents may be presented which have not been provided to the other party before the hearing if requested by the other party.

The Hearing Officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the Hearing Officer, the action of the CHA shall take effect and another hearing will not be granted.

The Hearing Officer will determine whether the action, inaction or decision of the CHA is legal in accordance with HUD regulations and this Administrative Plan based upon the evidence and testimony provided at the hearing. Factual determinations relating to the individual circumstances of the family will be based on a preponderance of the evidence presented at the hearing.

A notice of the hearing findings shall be provided in writing to the family within 30 days and shall include:

- A clear summary of the decision and reasons for the decision;
- If the decision involves money owed, the amount owed;
- The date the decision goes into effect.

The CHA is not bound by hearing decisions:

- Which concern matters in which the CHA is not required to provide an opportunity for a hearing
- Which conflict with or contradict HUD regulations or requirements;
- Which conflict with or contradict Federal, State or local laws; or
- Which exceed the authority of the person conducting the hearing.

The CHA shall send a letter to the participant if it determines the CHA is not bound by the Hearing Officer's determination within 10 days from the date of the letter issued by the Hearing Officer. The letter shall include the CHA's reasons for the decision.

All requests for a hearing, supporting documentation, and a copy of the final decision will be retained in the family's file.

17.8. Provisions for “Restrictions on Assistance to Non-Citizens”

Assistance to the family may not be delayed, denied or terminated on the basis of immigration status at any time prior to the receipt of a decision if the family has a pending appeal with INS.

17.9. INS Determination of Ineligibility

If a family member claims to be an eligible immigrant and the INS SAVE system and manual search do not verify the claim, CHA will notify the applicant or participant within 10 days, of their right to file an appeal with INS within thirty days from the notification from CHA; or of their right to request an informal review or hearing with CHA, either in lieu of or subsequent to the INS appeal.

If the family appeals to the INS, they must give CHA a copy of the appeal and proof of mailing or the CHA may proceed to deny or terminate assistance. The time period to request an appeal may be extended by CHA for good cause. The request for a CHA hearing must be made within 10 days of receipt of the notice offering the hearing or, if an appeal was made to the INS, within 10 days of receipt of that notice.

After receipt of a request for an informal review or hearing, CHA will conduct such review or hearing in accordance with the policies described above. If the hearing officer decides that the individual is not eligible, and there are no other eligible family members the CHA will:

- Deny the applicant family
- Defer termination if the family is a participant and qualifies for deferral
- Terminate the participant if the family does not qualify for deferral

If there are eligible members in the family, CHA will prorate assistance pursuant to HUD regulations.

All other complaints related to eligible citizen/immigrant status shall be handled as follows:

- If any family member fails to provide documentation or certification as required by the regulation, that member is treated as ineligible. If all family members fail to provide, the family will be denied or terminated for failure to provide.

- Participants whose termination is carried out after temporary deferral may not request a hearing since they had an opportunity for a hearing prior to the termination.
- Participants whose assistance is pro-rated (either based on their statement that some members are ineligible or due to failure to verify eligible immigration status for some members after exercising their appeal and hearing rights described above) are entitled to a hearing based on the right to a hearing regarding determinations of Tenant Rent and Total Tenant Payment.
- Families denied or terminated for fraud in connection with the non-citizens rule are entitled to a review or hearing in the same way as terminations for any other type of fraud.

17.10. Mitigating Circumstances for Individuals with Disabilities

When applicants are denied placement on the waiting list, or CHA is terminating assistance, the family will be informed that presence of a disability may be considered as a mitigating circumstance during the review or hearing process. Such circumstances shall be considered when making the final determination of the review or hearing.

SECTION 18

SPECIAL HOUSING TYPES

18.1. General

CHA will permit the use of all types of special housing arrangements in the Housing Choice Voucher Program. Special housing arrangements include such housing alternatives as shared housing, congregate housing, assisted living, cooperative housing and other housing choices that meet the needs of program participants. Families may choose whether to rent housing that qualifies as a special housing type or to rent other eligible housing in accordance with requirements of the program.

CHA will not set aside any program funding from the Housing Choice Voucher Program for use in special housing types. However, CHA will administer any vouchers it may receive from HUD as the result of a national set aside for special program types.

18.2. Single Room Occupancy

Single room occupancy (SRO) refers to a housing unit that generally lacks a kitchen and may have a shared bathroom. A single person may use a Housing Choice Voucher to reside in an SRO housing unit.

A separate lease and housing assistance payment contract will be executed for each assisted person residing in an SRO. The payment standard used for an SRO unit is 75 percent of the zero-bedroom payment standard as determined annually by CHA. While an assisted person resides in SRO housing, the SRO payment standard must be used to calculate the housing assistance payment.

The utility allowance for an assisted person residing in SRO housing is 75 percent of the zero-bedroom utility allowance. The CHA will ensure that all SRO units approved for the program are in compliance with all of the Housing Quality Standards for SROs.

18.3. Congregate Housing

Congregate housing normally refers to a housing unit located in a home or building that shares a central kitchen facility. The facility may have shared bathrooms or may offer individual bathroom facilities for each living unit. A warm up kitchen with a small counter and microwave may also be included in the unit.

A separate lease and HAP contract will be executed for each assisted family residing in a congregate housing unit. Unless there is a live-in aide, the payment standard for a family that resides in a congregate housing unit is the zero-bedroom payment standard on the CHA payment standard schedule. However, if there are two or more rooms in the unit (not including kitchen or sanitary facilities), the payment standard for a family that resides in a congregate housing unit is the one-bedroom payment standard amount.

The CHA will ensure that all congregate housing units approved for the program are in compliance with all of the Housing Quality Standards for congregate housing.

18.4. Group Homes [24 CFR 982.610, 982.612]

A group home is defined as a facility that is licensed, certified, or otherwise approved in writing by the State, or the State's licensing department for the exclusive residential use of two or more (maximum number determined by State law) persons who are elderly or persons with disabilities.

There will be a separate HAP contract and lease for each assisted person living in a group home. For a group home the term “pro-rata portion” means that which is derived by dividing the number of persons in the assisted household by the total number of residents (assisted and unassisted) residing in the group home. The number of persons in the assisted household equals one assisted person plus any CHA-approved live-in Aide.

The rent to owner for an assisted person may not exceed the pro-rata portion of the reasonable rent for the group home. In determining reasonable rent CHA will consider whether sanitary facilities, and facilities for food preparation and service, are common facilities or private.

Unless there is a live-in aide, the family unit size will be determined as a zero bedroom. If there is a live-in aide, the live-in aide will be counted in determining the family unit size.

The payment standard for a person who resides in a group home is the lower of the payment standard for the family unit size; or the pro-rata portion of the payment standard amount on the CHA payment standard schedule for the group home size (total number of bedrooms in the group home).

The utility allowance for each assisted person residing in a group home is the pro-rata portion of the utility allowance for the group home unit size. The CHA will ensure that all group home units approved for the program are in compliance with all of the Housing Quality Standards for group homes.

18.5. Shared Housing

Shared housing is a single housing unit occupied by more than one household. The unit normally consists of both common space for shared use by both households and separate private space (sleeping and bathing quarters) for each household. An assisted family may use their Housing Voucher to reside in shared housing. In shared housing, an assisted family may share a unit with another resident or residents of a unit. The unit may be a house or an apartment.

The owner of a shared housing unit may also reside in the unit. A resident owner may enter into a HAP contract with the CHA. However, housing assistance may not be paid on behalf of an owner. The CHA will not approve assistance for a person or family that is related by blood or marriage to a resident owner. There will be a separate housing assistance payment contract and lease for each assisted family residing in a shared housing unit.

For shared housing, the term “pro-rata portion” means the ratio derived by dividing the number of bedrooms in the private space available for occupancy by a family by the total number of bedrooms in the unit. For example, for a family entitled to occupy three bedrooms in a five bedroom unit, the ratio would be 3/5.

The rent to owner to owner for the family may not exceed the pro-rata portion of the reasonable rent for the shared housing dwelling unit.

For a family that resides in a shared housing unit the payment standard is the lower of the payment standard amount on the CHA payment standard schedule for the family unit size or the pro-rata portion of the payment standard amount on the CHA payment standard for the shared housing unit size.

The utility allowance for an assisted family living in shared housing is the pro-rata portion of the utility allowance for the shared housing unit. The CHA will ensure that all shared housing units approved for the program are in compliance with all of the Housing Quality Standards for shared housing.

18.6. Cooperative Housing

A cooperative refers to a type of housing in which an individual has an ownership interest, normally shares or a percentage, in the overall property. Coops are always designated on the ownership documents as cooperative housing and the CHA will confirm that a property is so designated prior to processing a voucher under this housing arrangement.

The CHA will approve a family living in cooperative housing if it is determined that assistance under the program will help maintain affordability of the cooperative unit for low-income families. The CHA will not approve assistance for a family in cooperative housing until the CHA has also determined that the cooperative has adopted requirements to maintain continued affordability for low-income families after transfer of a cooperative member's interest in a cooperative unit (such as a sale of the resident's share in a cooperative corporation).

For cooperative housing, the rent to owner is the monthly carrying charge under the occupancy agreement/lease between the member and the cooperative. The carrying charge consists of the amount assessed to the member by the cooperative for occupancy of the housing. It includes the member's share of the cooperative's debt service, operating expenses, and necessary payments to cooperative reserve funds. However, the carrying charge does not include down-payments or other payments to purchase the cooperative unit, or to amortize a loan to the family for this purpose. Gross rent is the carrying charge plus any tenant paid utility.

The lease and other appropriate documents will stipulate that the monthly carrying charge is subject to HCV limitations on rent to owner. The payment standard is applied in accordance with standard procedures for applicability of payment standards described earlier in this plan. Utility allowances are also applied in accordance with standard procedures.

The CHA will ensure that all cooperative housing units approved for the program are in compliance with all of the Housing Quality Standards.

18.7. Manufactured Homes

A manufactured home is a structure that is built on a permanent chassis, is designed for use as a principal residence but is movable, is not anchored to a foundation but does have tie downs. The CHA will permit a family to lease a manufactured home and space with assistance under the program. The CHA will also provide assistance for a family that owns the manufactured home and leases only the space.

Rent and utility allowances are calculated for manufactured homes in the same manner as single family homes.

A manufactured home must meet all the HQS requirements. In addition, the manufactured home also must meet the following requirements:

- A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind damage.
- A tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist wind overturning and sliding must securely anchor a manufactured home.

18.8. Manufactured Home Space Rental

CHA will not permit the use of Housing Choice Vouchers for rental of manufactured home space only.

SECTION 19

PROGRAM INTEGRITY

19.1. General

CHA is committed to assuring that the proper level of benefits is paid to all participating families, and that housing resources reach only income-eligible families so that program integrity can be maintained. The CHA will take all steps necessary to prevent fraud, waste, and mismanagement so that program resources are utilized judiciously.

This Chapter outlines CHA's policies for the prevention, detection and investigation of program abuse and fraud.

19.2. Criteria for Investigation of Suspected Abuse and Fraud

CHA's expectation is that participating families will comply with HUD requirements, provisions of the voucher, and other program rules. The CHA staff will make every effort (formally and informally) to orient and educate all families in order to avoid unintentional violations. However, the CHA has a responsibility to HUD, to the Community, and to eligible families in need of housing assistance, to monitor participants and owners for compliance and, when indicators of possible abuse come to the CHA's attention, to investigate such claims.

The CHA will initiate an investigation of a participating family in the event of one or more of the following circumstances:

Referrals, Complaints, or Tips. The CHA will follow up on referrals from other agencies, companies or persons which are received by mail, by telephone or in person, which allege that a family is in non-compliance with, or otherwise violating the family obligations or any other program rules. Such follow-up will be made providing that the referral contains at least one item of information that is independently verifiable. A copy of the allegation will be retained in the family's file.

Internal File Review. A follow-up will be made if CHA staff discovers (as a function of a certification or recertification, an interim redetermination, or a quality control review), information or facts which conflict with previous file data, the CHA's knowledge of the family, or is discrepant with statements made by the family.

Verification of Documentation. A follow-up will be made if the CHA receives independent verification or documentation which conflicts with representations in the family's file (such as public record information or credit bureau reports, reports from other agencies).

19.3. Steps to Prevent Program Abuse and Fraud

The CHA Staff will maintain a high level of awareness to indicators of possible abuse and fraud by assisted families. A variety of methods and practices to prevent program abuse, non-compliance, and willful violations of program rules by applicants and participating families will be undertaken by CHA.

This policy objective is to establish confidence and trust in the management by emphasizing education as the primary means to obtain compliance by families.

Program Orientation Session. Mandatory orientation sessions will be conducted by the CHA staff for all prospective program participants, either prior to or upon issuance of a voucher. At the conclusion of all Program Orientation Sessions, the family representative will be required to sign a “Program Briefing Certificate” to confirm that all rules and pertinent regulations were explained to them.

Review and Explanation of Forms. Staff will explain all required forms and review the contents of all (re)certification documents prior to signature.

Quality Control File Reviews. Prior to initial certification, and at the completion of all subsequent re-certifications, a percent of participant files will be reviewed by a supervisor. Such reviews shall include, but are not limited to:

- Assurance that verification of all income and deductions is present including a current EIV report.
- Changes in reported Social Security Numbers or dates of birth.
- Authenticity of file documents.
- Ratio between reported income and expenditures.
- Review of signatures for consistency with previously signed file documents.
- All forms are correctly dated and signed.

Observation. The CHA Staff will maintain high awareness of circumstances which may indicate program abuse or fraud, such as unauthorized persons residing in the household and unreported income.

Public Record Bulletins may be reviewed by Management and Staff.

Credit Bureau Inquiries. Credit Bureau inquiries may be made (with proper authorization by the participant) in the following circumstances:

- For households that claim zero income;
- When an allegation is received by the CHA wherein unreported income sources are disclosed.
- When CHA has reasonable suspicion that family has failed to report proper information.

19.4. Handling of Allegations of Possible Abuse and Fraud

The CHA staff will encourage all participating families to report suspected abuse. CHA will conduct a preliminary review of allegations to determine their validity. All such referrals, as well as referrals from community members and other agencies, will be thoroughly documented and placed in the participant's file.

All allegations, complaints and tips will be carefully evaluated in order to determine if they warrant follow-up. CHA will not follow up on allegations which are vague or otherwise non-specific. CHA will review allegations, which contain one or more independently verifiable facts.

File Review. An internal file review will be conducted to determine: If the subject of the allegation is a client of the CHA and, if so, to determine whether or not the information reported has been previously disclosed by the family. It will then be determined if CHA is the most appropriate authority to do a follow-up (more so than police or social services). Any file documentation of past behavior as well as corroborating complaints will be evaluated.

Conclusion of Preliminary Review. If at the conclusion of the preliminary file review there is/are fact(s) contained in the allegation which conflict with file data, and the fact(s) are independently verifiable, CHA will initiate an investigation to determine if the allegation is true or false.

19.5. Investigation of Allegations of Abuse and Fraud

If the CHA determines that an allegation may be true, further investigation will be undertaken. The steps taken will depend upon the nature of the allegation and may include, but are not limited to, the items listed below. In all cases, the CHA will secure the written authorization from the program participant for the release of information.

Credit Bureau Inquiries. In cases involving previously unreported income sources, a CBI inquiry may be made to determine if there is financial activity that conflicts with the reported income of the family.

Verification of Credit. In cases where the financial activity conflicts with file data, a Verification of Credit form may be mailed to the creditor in order to determine the unreported income source.

Employers and Ex-Employers. Employers or ex-employers may be contacted to verify wages which may have been previously undisclosed or misreported.

Neighbors/Witnesses. Neighbors and/or other witnesses may be interviewed who are believed to have direct or indirect knowledge of facts pertaining to the CHA's review.

Other Agencies. Investigators, caseworkers or representatives of other benefit agencies may be contacted.

Public Records. If relevant, the CHA will review public records kept in any jurisdictional courthouse. Examples of public records which may be checked are: real estate, marriage, divorce, uniform commercial code financing statements, voter registration, judgments, court or police records, state wage records, utility records and postal records.

Interviews with Head of Household or Family Members. The CHA will discuss the allegation (or details thereof) with the Head of Household or family member by scheduling an appointment at the appropriate CHA office.

The CHA staff person who conducts such interviews will maintain a high standard of courtesy and professionalism. Under no circumstances will management tolerate inflammatory language, accusation, or any unprofessional conduct or language. If possible, an additional staff person will attend such interviews.

Documents and other evidence obtained by the CHA during the course of an investigation will be considered “work product” and will be kept in a separate “work file.” Such cases under review will not be discussed among CHA Staff unless they are involved in the process, or have information, which may assist in the investigation.

At the conclusion of the investigative review, CHA will determine whether a violation has occurred, a violation has not occurred, or if the facts are inconclusive.

If it is determined that a program violation has occurred, the CHA will review the facts to determine:

- The type of violation (procedural, non-compliance, fraud);
- Whether the violation was intentional or unintentional.
- What amount of money (if any) is owed by the family.
- If the family is eligible for continued occupancy.

19.6. Action for Documented Violations

Once a program violation has been documented, CHA will take the appropriate action including proposed termination of assistance and other legal action as described in this Plan.

SECTION 20

SECTION 8 MANAGEMENT ASSESSMENT PROGRAM

20.1. General

The U.S. Department of Housing and Urban Development implemented the Section 8 Management Assessment Program (SEMAP) on October 13, 1998 to serve as a management tool for objectively measuring program compliance, identifying management capabilities and deficiencies, as well as improving risk assessment for potential program problems. SEMAP also provides local housing agencies with a structured self-assessment system for evaluating the tenant-based rental assistance programs.

It is CHA's policy to manage the Housing Choice Voucher Program to assure ultimate program performance and achieve high performance status each year.

20.2. Performance Indicators

The following performance indicators and applicable points have been established under the SEMAP Program.

Performance Indicator	Total Possible Points
1. Selection from the Waiting List	15
2. Rent Reasonableness	20
3. Adjusted Income	20
4. Utility Allowance	5
5. HQS Quality Control	5
6. HQS Enforcement	10
7. Expanding Housing Opportunity	5
8. Payment Standards	5
9. Annual Reexaminations	10
10. Tenant Rent Calculations	5
11. Precontract HQS Inspections	5
12. Annual Inspections	10
13. Lease-Up	20
14. FSS Escrowing/ % of Families with Escrow Accounts	5
15. Deconcentration Bonus	5
TOTAL POSSIBLE POINTS	150
High Performer: 90+% Standard Performer: 61-89% Troubled: <=60%	

20.3. Certification Period

CHA is required to submit a certification to HUD within 60 days from the end of the fiscal year.

20.4. The SEMAP Certification Process

Each year, CHA will conduct a SEMAP confirmatory review. A detailed review, narrative report and supporting documentation will be prepared and presented to the CHA Board of Commissioners to support the annual SEMAP certification that is approved by the Board. The certification for each of the performance indicators will be supported by documentation from the following sources:

- Family files and computer records
- Public Housing Information Center (PIC)
- Management files, marketing materials, studies, and surveys.

20.5. Family Files and Computer Records

A random sample of family files and Computer Records along with management files, marketing materials, studies and surveys were reviewed to support the following SEMAP indicators:

- Indicator 1: Selection from the Waiting List
- Indicator 2: Rent Reasonableness
- Indicator 3: Adjusted Income
- Indicator 4: Utility Allowance Schedule
- Indicator 5: HQS Quality Control
- Indicator 6: HQS Enforcement
- Indicator 7: Expanding Housing Opportunities
- Indicator 8: Payment Standards
- Indicator 15: De-concentration (Bonus)

20.6. PIC Data

The Public Housing Information Center (PIC) is a national database of all families received housing assistance under the Housing Choice Voucher Program and the Public Housing Program. Family information is electronically submitted to PIC upon completion of a HUD 50058 Family Report. CHA will maintain a successful submission greater than 95% each year.

The following SEMAP indicators are evaluated based on information from the PIC database.

- Indicator 9: Annual Reexaminations
- Indicator 10: Tenant Rent Calculations
- Indicator 11: Pre-Contract HQS
- Indicator 12: Annual Inspections
- Indicator 14: FSS Enrollment and Escrow Account

Indicator 13, Lease-Up will be based on data provided by the Financial Management Center (FMC) to the Field Office for SEMAP scoring purposes. The SEMAP score for this indicator will be based on leasing data at the end of the calendar year that ends on or before the end of the PHA fiscal year.

20.7. Summary by Indicator

Indicator 1: Selection from the Waiting List – The purpose of this indicator is to determine whether the local housing agency has written admission policies in its Administrative Plan and to confirm whether the agency follows their admission policies when selecting applicants from the waiting list. The Administrative Plan must be formally adopted by the Housing Authority and must be submitted to HUD.

HUD will rate this indicator on the SEMAP certification. An agency can earn either all or none of the 15 points for this indicator. To earn all 15 points, the review must confirm that the agency has written admissions policies in its Administrative Plan and at least 98% of the families in the sample were selected from the waiting list in accordance with these policies and met the selection criteria that determined their places on the waiting list and their order of selection.

Indicator 2: Rent Reasonableness – The purpose of this indicator is to determine whether the housing agency has implemented a written, reasonable method for determining and documenting the rent charged for each unit leased. The method used must ensure that the rent charged is reasonable based on current rents for comparable unassisted units at the time of initial leasing; when there is any increase in the rent to owner; and at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary.

This indicator will be rated by HUD on the CHA's SEMAP certification. An agency can earn a maximum of 20 points for this indicator if the review confirms that:

- The CHA has a reasonable method it follows to determine reasonable rent which considers location, size, type, quality, and age of the units, and the amenities, housing services, and maintenance and utilities provided by the owner; and
- A random sample of tenant files demonstrates that the rent reasonable system was used and documented in 98% of the files sampled for initial lease-up, any rent increase to owner, and if there is a 5% decrease in the published FMR in effect 60 days prior to the HAP contract anniversary.

Fifteen points can be earned if the review confirms that the above criterion is met in 80-97% of the units sampled for the review. Zero points are earned if the rent reasonableness method is used and documented in less than 80% of the random sample files that are reviewed.

Indicator 3: Adjusted Income – The purpose of this indicator is to determine whether the housing agency has verified and correctly determined adjusted annual income for each assisted family at the time of admission; and at annual reexamination.

This indicator will be rated by HUD on the SEMAP certification. An agency can earn a maximum of 20 points for this indicator if the review confirms that based on a random sample in at least 90% of the families:

- The HA obtains 3rd party verification of reported family income, the value of assets totaling more than \$5000, expenses related to deductions from annual income and other factors that affect the determination of adjusted income, and/or the HA documents in tenant files why third party verification was not available;
- The HA properly attributes and calculates allowances for any medical, child care, and/or disability assistance expenses; and
- The CHA uses the appropriate utility allowance to determine gross rent for the unit leased.

Fifteen points can be earned if the review confirms that the above criteria are met in 80-89% of the files sampled for the review. Zero points are earned if adjusted income determinations are correct and properly documented in less than 80% of the random sample files reviewed.

Indicator 4: Utility Allowance Schedule – The objective of this indicator is to determine whether the CHA maintains an up-to-date utility allowance schedule in accordance with HUD program regulations, (24 CFR 982.517.)

This indicator will be rated by HUD on the SEMAP certification. An agency can earn a maximum of 5 points for this indicator if the review confirms that the CHA reviewed utility rate data within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10 percent or more in a utility rate since the last time the utility allowance schedule was revised.

Indicator 5: HQS Quality Control Inspections – The purpose of this indicator is to determine whether a CHA supervisor or other qualified person re-inspects a sample of the units under contract during the last completed CHA fiscal year. The quality control inspection process tests consistency in adherence to the Housing Quality Standards and also helps to determine if inspectors require additional training.

This indicator will be rated by HUD on the CHA's SEMAP certification. An agency can earn a maximum of 5 points for this indicator, if the review confirms that:

- A sample of assisted units were quality control inspected based on the sample size required for the number of units under contract.
- The sample represents units recently inspected (HQS inspections perform during the 3 months preceding the quality control inspection)
- The sample represents cross-section of inspectors and neighborhoods

Indicator 6: HQS Enforcement – The purpose of this indicator is to test the Housing Authority's ability to insure that life- threatening HQS deficiencies are corrected within 24 hours from the date of inspection and that all other HQS deficiencies are corrected within no more than 30 calendar days from the date of the inspection or any HA-approved extension. The indicator also tests whether the Authority has appropriately abated the rent to owner no later than the first of the month following the specified correction period, and if not corrected termination of the HAP contract.

This indicator also measures the response of the HA for family caused defects, and whether or not the Authority takes prompt and vigorous action to enforce the family obligations.

This indicator will be rated by HUD on the HA's SEMAP certification. An agency can earn a maximum of 10 points for this indicator if the review confirms that based on a random sample:

- 100% of life-threatening emergencies were completed within 24 hours;
- 98% of all other cited HQS deficiencies were corrected within no more than 30 days or any HA approved extension;
- If deficiencies were not corrected within required time frame, the HAP payment was abated no later than the first of the month following the correction period or the HAP contract was terminated or for family-caused defects took prompt and vigorous action to enforce the family obligations.

Indicator 7: Expanding Housing Opportunities – The purpose of this indicator is to determine whether the housing agency has adopted and implemented a written policy to encourage participation by owners with units located outside areas of poverty or minority concentration; informs rental voucher and certificate holders of the full range of areas where they may lease units both inside and outside of the CHA's jurisdiction; and supplies a list of landlords or other parties who are willing to lease units or help families find units, including units outside areas of poverty or minority concentration.

This indicator will be rated by HUD on the HA's SEMAP certification. An agency can earn a maximum of 5 points for this indicator if the review confirms that:

- The HA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration; the HA clearly delineates areas in its jurisdiction that the HA considers areas of poverty or minority concentration, and which includes actions the HA will take to encourage owner participation.
- The HA encouraged participation by owners outside areas of poverty and minority participation.
- The HA has prepared maps that show various areas, both within and outside of its jurisdiction.

- The HA's information packet for certificate and voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the rental voucher or certificate programs, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration
- The HA's information packet includes an explanation of how portability works and includes a list of neighboring HA with the name, address and telephone number of a portability contact person at each.
- CHA has analyzed whether rental voucher and certificate holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, if such difficulties have been found, CHA documentation shows that the CHA has analyzed whether it is appropriate to seek approval of area exception rents in any part of its jurisdiction and has sought HUD approval of exception rents when necessary.

Indicator 8: Payment Standards – The purpose of this indicator is to determine whether the housing agency has verified and correctly determined adjusted annual income for each assisted family at the time of admission; and annual reexamination.

This indicator will be verified by HUD through the use of payment standard information submitted to HUD on the SEMAP certification form and PIC gross rents and FMR data. An agency can earn a maximum of 5 points for this indicator if:

- At least 98% of the families newly leased in the certificate program, excluding over-FMR families, have initial gross rents at or below the applicable FMR or approved exception rent limit, and
- That the CHA has adopted payments standards which do not exceed the applicable FMR or approved exception rent limit and which are not less than 80% of the current FMR, unless approved by HUD.

Zero points are earned if the random sample demonstrates that more than 2% of the files sample have gross rents that exceed the applicable FMR, or HUD-approved exception rent limits, or the HA's rental voucher program payment.

Indicator 9: Annual Re-Certifications – The purpose of this indicator is to determine whether the housing agency completes an annual re-examination for each participating family at least every 12 months.

This indicator will be verified by PIC reports showing the percent of reexaminations that are more than 2 months overdue. An agency can earn a maximum of 10 points for this indicator if the PIC report confirms that fewer than 5% of all CHA reexaminations are more than 2 months overdue. Five points can be earned if the report confirms that 5 to 10% of all CHA reexaminations are more than 2 months overdue. Zero points are earned if more than 10% of all CHA reexaminations are more than 2 months overdue.

Indicator 10: Correct Tenant Rent Calculations – The purpose of this indicator is to determine whether the housing agency correctly calculates tenant rent in the rental certificate program, and the family's share of the rent to owner in the rental voucher program.

This indicator will be verified by PIC reports. The reports will demonstrate the percent of tenant rent and family's share of the rent to owner calculations that are incorrect based on data sent to HUD on the HUD-50058 form.

An agency can earn a maximum of 5 points for this indicator if the PIC report confirms that 2% or fewer of all CHA tenant rent and family's share of rent to owner calculations are incorrect. Zero points will be awarded if more than 2% of all CHA tenant rent and family's share of rent to owner calculations are incorrect.

Indicator 11: Pre-contract HQS Inspections – The purpose of this indicator is to determine whether newly leased units passed HQS inspection on or before the beginning date of the assisted lease and HAP contract.

This indicator will be verified by the PIC report which shows the percent of newly leased units where the beginning date of the assistance contract is before the date the unit passed HQS inspection. If 98 to 99 percent of newly leased units passed HQS inspection before the beginning of the HAP contract, the CHA will receive 5 points. If fewer than 98% passed inspection prior to execution of the contract, the CHA will receive 0 points.

Indicator 12: Biennial HQS Inspections – The purpose of this indicator is to determine whether the housing agency inspects each unit under contract at least every two years or utilizes an alternate inspection pursuant to Section 220 of the 2014 Appropriations Act.

This indicator will be verified by the PIC report, which shows the percent of HQS inspections that are more than 2 months passed due. It should be noted that the 2-month allowance is provided to accommodate a possible lag in the housing agency's electronic submission and not in the completion of the inspection. The CHA will receive 10 points if fewer than 5% of the annual inspections are more than two months late, 5 points if 5% to 10% are more than two months late and, 0 points if more than 10% of annual inspections are more than two months late.

Indicator 13: Lease-Up – The purpose of this indicator is to determine whether the housing agency utilized its annual budget authority plus any HAP reserves to support the maximum number of vouchers up to the maximum number of baseline vouchers under the ACC.

This indicator will be verified by the percent of annual HAP expense divided by the annual budget authority. An agency can earn a maximum of 20 points for this indicator if the percent of annual budget authority utilized was 98% or more. Fifteen points will be awarded if 95-98% of annual budget authority was utilized. Zero points will be awarded if less than 95% of the annual budget authority was utilized.

Indicator 14 – Family Self-Sufficiency – The purpose of this indicator is to determine whether the CHA has enrolled families in the FSS program as required, and the extent of the CHA's progress in supporting FSS by measuring the percent of current FSS participants with FSS progress reports entered in PIC that have had increases in earned income which resulted in escrow account balances.

HUD will verify this indicator through the PIC report that shows the number of families currently enrolled in FSS. This number is divided by the number of mandatory FSS slots based on funding reserved for the CHA through the second to last completed Federal Fiscal Year, or based on a reduced number of mandatory slots under a HUD-approved exception. A PIC report also shows the percent of FSS families with FSS progress reports who have escrow account balances. HUD also uses information reported on the SEMAP certification by initial CHA's concerning FSS families enrolled in their FSS programs but who have moved.

Indicator 15: Deconcentration – The purpose of this indicator is to determine what percentage of Section 8 families with children who live in and who have moved during the reporting period, moved to low-poverty census tracts in the CHA's principal operating area.

This indicator will be verified by the CHA data submitted for the de-concentration bonus and the latest independent auditor annual audit report.

20.8. Corrective Action

CHA will develop an internal corrective action plan for any indicator in which the performance score for that fiscal year is less than high performer. The corrective action plan will be closely monitored by staff to assure increased performance in the corresponding performance area.

SECTION 21

HOMEOWNERSHIP

21.1 General

The Columbia Housing Authority (CHA) will provide current Housing Choice Voucher (HCV) participants with the option of participating in the Housing Choice Voucher Homeownership Program.

Chapter 21 sets forth the policies of CHA for the administration of the Housing Choice Voucher Homeownership Program.

21.2 Eligibility for Homeownership Assistance

To be eligible to participate in the Housing Choice Voucher Homeownership Program, the family must meet all of the requirements listed below.

- The family must have been a participant in the Housing Choice Voucher program for a minimum of one year.
- The family must qualify as a first-time homeowner.
- The income of adult family members who will own the home must meet one of the following:
 - ✓ An annual adjusted income of \$30,000 per year; or,
 - ✓ If pre-qualified or pre-approved for financing that is sufficient to purchase an eligible unit, an annual gross income equal to the federal minimum wage multiplied by 2000; or,
 - ✓ If a disabled family, income equal to the current SSI monthly payment for an individual living alone, multiplied by 12.
- Welfare assistance payments for adult family members who will own the home will not be included in determining whether the family meets the minimum income requirement unless the household meets the definition of an elderly or disabled household.
- The family must satisfy the employment requirements by demonstrating that one or more adult members of the family who will own the home at commencement of homeownership assistance is currently employed on a full-time basis (not less than an average of 30 hours per week); and has been continuously employed during the year before commencement of homeownership assistance for the family.
- The family has not defaulted on a mortgage securing debt to purchase a home under the homeownership option.
- No family member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- All adult members that will own the home must have a minimum credit score of 600; must have zero past-due debt; and a Debt-to-Income ratio of no more than 35%.
- Establish a restricted savings account with Community Works Federal Credit Union ("CWFCU") and accumulate a minimum of \$1000 prior to issuance of the Homeownership Voucher.

21.3 Eligible Homeownership Units

Eligible units for homeownership assistance shall be limited to the following unit types.

- The unit may not be any of the following:
 - ✓ A public housing or Indian housing unit;
 - ✓ A unit receiving Section 8 project-based assistance;
 - ✓ A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;
 - ✓ A college or other school dormitory;
 - ✓ On the grounds of penal, reformatory, medical, mental, or similar public or private institutions.
- The unit must be under construction or already exist at the time the family enters into the contract of sale.
- The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.
- The unit must be inspected by CHA and by an independent inspector designated by the family.
- The unit must meet Housing Quality Standards.
- For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years.
- If CHA owns the units to be purchased by an eligible family under the HCV Homeownership Program the following additional conditions shall apply.
 - ✓ CHA shall inform the family, in writing, that the family has the right to purchase any eligible unit and a PHA-owned unit is freely selected by the family without PHA pressure or steering;
 - ✓ The unit meets all other eligibility requirements;
 - ✓ CHA will obtain the services of an independent agency to inspect the unit for compliance with HQS, review the independent inspection report, review the contract of sale, determine the reasonableness of the sales price and any PHA provided financing.

21.4 Homeownership Counseling

Pre-purchase Counseling - HCV Participants interested in the Homeownership Option must meet with a Homeownership Specialist and be referred to CHA's Family Self-Sufficiency ("FSS") Program. Interested Participants must enroll in the FSS Program or enroll with an FSS Case Manager as a "Service Client".

The FSS Case Manager will conduct an initial Homeownership Preparedness Pre-Qualification Assessment. If the client is deemed ready for homeownership, client will be referred to the Columbia County Human Relations Commission (GCHRC) for homeownership counseling.

If client is not deemed ready, FSS Specialist will continue intensive case management until client obtains a place of readiness, based upon mutually-agreed-upon goals.

The family must attend and satisfactorily complete GCHRC pre-assistance homeownership and housing counseling program which includes the information described below.

- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

Post-Purchase Counseling – All Homebuyers must attend a minimum of one post-purchase class within 90 days from the date of closing. The assigned FSS Case Manager will coordinate follow-up with each Homebuyer to assure attendance. CHA will also require mandatory ongoing post-purchase counseling upon notification by the family's lender of a second late payment. Failure to participate in the post-purchase counseling will be grounds for termination of assistance.

21.5 Voucher Issuance and Contract of Sale

Total Housing Costs and Maximum Purchase Price - Upon completion of the Pre-Purchase Homeownership classes, CHA will provide the family with an estimate of total housing costs and the estimated maximum home purchase price that can be supported by the family.

Total housing costs are defined as PITI (Principal, Interest, Taxes, and Insurance), a required monthly maintenance reserve of \$25.00, and Homeowner Association (HOA) or Condominium Dues, if applicable. The maximum home purchase price will be estimated based on the total housing cost cannot at no more than 110% of the HUD Fair Market Rent for the bedroom size applicable to the family composition at the time of issuance of the Homeownership Voucher.

Lender Pre-Approval – The family shall utilize the estimate provided by CHA to secure a pre-approval letter from a qualified lender. A copy of the pre-approval letter must be submitted by the family prior to issuance of the Homeownership Voucher to commence the family's search for a housing unit.

Contract of Sale – The family must enter into a purchase contract with the seller of the unit to be acquired by the family and a copy of the contract must be provided to CHA for approval. CHA may deny a seller for any reasons stated in Section 15 of this Administrative Plan.

The contract of sale must:

- Specify the price and other terms of sale by the seller to the purchaser;
- Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser;
- Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser;
- Provide that the purchaser is not obligated to pay for any necessary repairs; and
- Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation in any federal housing program.

At the request of the family, CHA will provide a list of Licensed Real Estate Agents to assist in their search for a home to purchase.

21.6 Financing

Qualified financing shall be limited to the mortgage programs of the Federal Housing Administration (FHA); the Veterans Administration (VA); the South Carolina Housing and Finance Development Authority (SCHFDA); and FDIC insured commercial banks.

All financing must be fixed rate, fixed term loans. CHA will not approve any adjustable rates or balloon payments and no seller financing will be approved.

Lenders must be agreeable to acceptance of two payments for monthly mortgage payments; the homebuyer portion paid by the family and the homebuyer assistance paid by CHA.

21.7 Home Inspections

An independent professional inspector selected by and paid for by the family must inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

The independent inspector may not be a CHA employee or contractor, or other person under control of the CHA.

CHA will conduct a Housing Quality Standard Inspection of the unit upon receipt of the report from the independent inspector. CHA will disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS.

21.8 Closing and Continued Assistance

Closing - A copy of the final closing statement must be forwarded to CHA for review prior execution of closing documents to confirm that the final terms of the purchase and financing are consistent with what has been approved by CHA. A copy of the mortgage with an amortization schedule shall be forwarded to CHA upon completion of the closing transaction.

Homeowner assistance will be based on the income on which the household was approved for homeownership for a period. Any changes in household circumstances must be reported in accordance with the Interim Recertification requirements outlines in Section 11 of this Administrative Plan.

Continued Assistance - The family will be required to execute a statement of in which the family agrees to comply with all family obligations under the homeownership option.

The family must comply with the following obligations:

- The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing if approved by CHA, of such debt.
- The family may not convey or transfer ownership of the home without prior approval of CHA and except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member.
- The family must supply information to CHA or HUD. The family must further supply any information required by CHA or HUD concerning mortgage financing or refinancing, sale or transfer of any interest in the home, or homeownership expenses.
- The family must notify CHA before moving out of the home.
- The family must notify CHA if the family defaults on the mortgage used to purchase the home.
- No family member may have any ownership interest in any other residential property.
- The family must comply with the obligations of a participant family in the Housing Choice Voucher Program.

Homeownership assistance may only be paid while the family is residing in the home. If the family moves out of the home, the Homeownership assistance shall cease on the first of the month following the family vacating the unit.

Maximum Term of Homeownership Assistance - Except in the case of a family that qualifies as an elderly or disabled family, other family members shall not receive homeownership assistance for more than:

- Fifteen years, if the initial mortgage incurred to finance purchase of the home has a term of 20 years or longer; or
- Ten years, in all other cases.

The maximum term described above applies to any member of the family who:

- Has an ownership interest in the unit during the time that homeownership payments are made; or
- Is the spouse of any member of the household who has an ownership interest in the unit during the time homeownership payments are made.

In the case of an elderly family, the exception only applies if the family qualifies as an elderly family at the start of homeownership assistance. In the case of a disabled family, the exception applies if at any time during receipt of homeownership assistance the family qualifies as a disabled family.

If, during the course of homeownership assistance, the family ceases to qualify as a disabled or elderly family, the maximum term becomes applicable from the date homeownership assistance commenced. However, such a family must be provided at least 6 months of homeownership assistance after the maximum term becomes applicable (provided the family is otherwise eligible to receive homeownership assistance).

If the family has received such assistance for different homes, or from different PHAs, the total of such assistance terms is subject to the maximum term described in this part.

Homeownership assistance for a family shall terminate automatically 180 calendar days after the last homeownership assistance payment on behalf of the family.

21.9 Portability

Subject to the restrictions on portability included in HUD regulations and CHA policies, a family may exercise portability if the receiving PHA is administering a voucher homeownership program and accepting new homeownership families. The receiving PHA may absorb the family into its voucher program, or bill the initial PHA.

The family must attend the briefing and counseling sessions required by the receiving PHA. The receiving PHA will determine whether the financing for, and the physical condition of the unit, are acceptable. The receiving PHA must promptly notify the initial PHA if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the PHA.

21.10 Moving with Continued Assistance

A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home.

The PHA may deny permission to move to a new unit with continued voucher assistance:

- If the PHA has insufficient funding to provide continued assistance.
- In accordance with the policies set forth in this Administrative Plan regarding denial or termination of assistance.

- In accordance with the PHA's policy regarding number of moves within a 12-month period.

The PHA must deny the family permission to move to a new unit with continued voucher rental assistance if:

- The family defaulted on an FHA-insured mortgage; and
- The family fails to demonstrate that the family has conveyed, or will convey, title to the home, as required by HUD, to HUD or HUD's designee; and the family has moved, or will move, from the home within the period established or approved by HUD.

21.11 Denial or Termination of Assistance

CHA may deny or terminate homeownership assistance in accordance with the policies set forth for the Housing Choice Voucher Program in this Administrative Plan.

CHA will terminate voucher homeownership assistance for any family receiving homeownership assistance that is dispossessed from the home pursuant to a judgment or order of foreclosure on any mortgage (whether FHA insured or non-FHA) securing debt incurred to purchase the home, or any refinancing of such deb

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SECTION 22

FAMILY SELF-SUFFICIENCY

22.1 General

The Family Self-Sufficiency (FSS) Program is a component of the Housing Choice Voucher Program which provides supportive services and financial incentives for HCV participants to become economically and socially self-sufficient.

This Chapter provides policy statements for the Family Self-Sufficiency program. Unless otherwise stated, the general administrative requirements of these programs will be the same as stated throughout the Administrative Plan.

22.2 Family Self-Sufficiency

The CHA Family Self-Sufficiency Program is a voluntary program. CHA has no mandatory FSS Program slots.

The purpose of the CHA Family Self-sufficiency Program is to promote the development of local strategies to coordinate the use of HCV Housing Assistance with public and private resources and to enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency.

The objective of the FSS Program is to reduce the dependency of low-income families on welfare assistance and on Housing Assistance. Under the FSS Program, families are provided opportunities for education, job training, counseling and other forms of social service assistance while receiving HCV Housing Assistance so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency.

22.3 Action Plan

The FSS Action Plan details the procedures of CHA's operation of the FSS Program and addresses those items not otherwise addressed in the HCV Administrative Plan that are specific to the operation of the FSS Program. The FSS Action Plan may be updated from time to time; such changes shall be incorporated into the annual Agency Plan.

22.4 Contract of Participation

Each family that chooses to participate in the FSS Program must execute a Contract of Participation (COP) with HAS. The COP incorporates the individual training and services plan including specific interim and final goals and sets forth the principal terms and conditions governing participation in the FSS Program. The COP shall be prepared in the format prescribed by HUD and executed by the head of the FSS family.

22.5 Employment Obligation

The head of the FSS family is required to seek and maintain suitable employment during the term of the contract. Seek employment means that the head of the FSS family has applied for employment, attended job interviews and has otherwise followed through on employment opportunities. A determination of suitable employment shall be made by CHA based on the skills, education, job training of the head of the household and the availability of job opportunities.

22.6 FSS Escrow Account

An FSS escrow account shall be established for qualified families pursuant to HUD regulations. A family is eligible for an escrow contribution when there is an increase in earned income. Such escrow shall be established at the time of a re-certification based on the interim re-certification requirements described elsewhere in this Administrative Plan. Escrow contributions shall be credited monthly to each individual account and a statement of the account balance shall be issued at least annually following the close of CHA's fiscal year. Interest shall accrue at the actual amount paid by the financial institutions where the funds are on deposit.

Interim Disbursement of Funds – Escrow funds are to be considered as a savings account for the family to achieve and remain economically self-sufficient upon satisfactory completion of the FSS Program. The intended use of escrow funds is to provide down payment assistance for homeownership or to serve as a financial cushion for difficult times the family may face after graduating from the FSS Program. Therefore, CHA will only consider requests for interim disbursement of escrow funds under the following conditions:

- The family must not have received an escrow contribution for a minimum period of two years prior to the request;
- Generally, only one interim distribution of funds will be approved during the life of the COP; however, CHA may authorize additional disbursements at its sole discretion based on an unforeseen emergency;
- The family must be in compliance with all family obligations under the Housing Choice Voucher;
- No request for interim disbursements will be considered until such time that the family has completed at least two of the stated interim goals in the COP and all interim goals identified through the time of the request must have been completed on schedule or in accordance with any CHA approved revisions to the schedule;
- Release of the requested escrow funds will permit the head of the household to complete a critical interim goal in their COP;
- The head of household has researched all other available resources and provides CHA with documentation that no other resources are available to meet the required goal.

If the request is for educational expenses, the participant must provide documentation that they have applied for and been denied financial aid from the educational institution and, such denial must be through no fault of the individual.

Denial due to failure to make payments on student loans will require the participant to negotiate a deferral and/or settlement with the Department of Education. Denial due to grade point average will require attendance records indicating that poor grades are not related to failure to attend class and a plan for tutorial or other academic assistance.

If a request is for payment of debts, no approval will be granted until such time that the family has attended financial counseling and developed a consolidated payment program for all outstanding debts and has satisfactorily complied with such payment plan for a period of one year.

If a request is for the purchase of a vehicle to provide needed transportation, the individual must be able to demonstrate the ability to pay the cost of gas, maintenance and insurance for the vehicle.

Requests for disbursements of funds shall be processed as follows:

- The family must submit the request and justification for the request, in writing in the format prescribed by CHA;
- Documentation must be attached which demonstrates that the family has researched all other available resources for funding the specific goal which is to be funded by the escrow funds and has been unsuccessful in securing other resources;
- Assigned staff will review the requests and determine if the family is in compliance with all requirements governing interim disbursement of escrows and provide a recommendation for the action to be taken;
- All disbursements will be made in the form of a check and CHA reserves the right to issue such check to the applicable vendor and not the individual program participant.

Final disbursement of Escrow Funds – Final disbursement of all escrow funds will only be disbursed as follows:

- Upon successful completion of the Contract of Participation (COP) and graduation from the FSS Program;
- The head of the household has maintained employment for a period of two consecutive years;
- The family provides a certification signed by the head of the household and duly notarized, that no individual in the household receives any federal, state or other public assistance.

SECTION 23

VETERANS AFFAIRS SUPPORTIVE HOUSING PROGRAM

23.1 Overview

The Veterans Affairs Supportive Housing (VASH) Program is an optional component of the Housing Choice Voucher Program administered by housing agencies that partner with local Department of Veterans Affairs (VA) medical facilities to provide tenant based vouchers to homeless veterans.

HUD provides a special set aside of funding specifically for VASH vouchers. HUD has established policies and procedures for VASH vouchers that are different from the standard tenant based vouchers. VASH vouchers shall be administered pursuant to the policies and procedures set forth by HUD under the VASH program.

This Chapter outlines the administrative requirements that apply specifically to the VASH vouchers. If not otherwise specified, all standard Voucher Program requirements set forth elsewhere in this Administrative Plan will apply.

23.2 Family Eligibility and Selection

VA Eligibility – Eligible families are homeless veterans and their families. Veterans Affairs case managers will refer VASH eligible families to CHA for the issuance of a voucher. A copy of the written referral document must be maintained in the CHA participant file and serves as the application to the program. CHA will not maintain a waiting list or apply any preferences to the VASH applicants.

Screening – VA case managers will screen applicants in accordance with the criteria set forth by the Veterans Administration. CHA cannot screen or deny admission to any VASH applicant for any reason with one exception: CHA will prohibit admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. VASH referrals shall not be denied admission to the program for any former program violations. Veterans terminated under the VASH program may be re-referred by the VA Case Manager and CHA shall accept the referral regardless of former history with the voucher program.

Addition of Family Members – When adding a family member after the veteran has been admitted to the program, other than birth, adoption or court awarded custody, CHA will approve additional family members pursuant to standard screening criteria set forth elsewhere in this Plan.

Verification of Social Security Number(s) – An original document issued by a federal or state government agency, which contains the name of the individual and the social security number is acceptable to verify social security numbers for all household members. Copies of the social security card are not required. CHA must accept the “Certificate of Release and Discharge from Active Duty (DD-214)” for the veteran as verification of his/her social security number.

Fair Housing – The VASH Program is administered in accordance with all applicable Fair Housing requirements. When VASH recipients include veterans or family members with disabilities, HUD’s reasonable accommodation standards apply.

23.3 Voucher Term

The VASH voucher shall be valid for a total term of 180 days. The initial term of the voucher shall be for a period of 120 days. One extension of an additional 60 days will be provided upon recommendation of the VA case manager.

23.4 Eligible Housing and Lease Provisions

VASH families will be permitted to live on the grounds of a VA facility in units developed to house homeless veterans. Therefore, the provisions which prohibit use of vouchers on the physical grounds of medical, mental, or similar public or private institutions does not apply to the VASH program.

To provide a greater range of housing opportunities for veterans, CHA will enter into lease agreements for an initial period of less than 12 months and will encourage property owners and landlords to provide month to month leases for the VASH participants.

23.5 Portability

An eligible family that is issued a VASH voucher must receive case management services provided by the Veterans Administration Medical Center (VAMC). Therefore, VASH participants may reside only in jurisdictional areas that are accessible to case management services as determined by the VA case manager.

If the veteran wishes to move to an area where another PHA administers VASH vouchers, then CHA will work with the VA case manager to assure that the veteran’s case management services are transferred to the VAMC in the area where the veteran is moving. The receiving PHA will absorb the VASH voucher by issuing one of its VASH vouchers and will return CHA’s VASH voucher for issuance to another veteran in CHA’s jurisdiction.

If the veteran wishes to move to an area where there is not a PHA with a VASH program but CHA’s partnering VAMC will still be able to provide case management services, CHA will process a portability move. However, since CHA must maintain the records on the VASH vouchers, the receiving PHA must bill CHA pursuant to the voucher portability requirements.

If the VAMC determines that case management services are no longer required, then CHA will process a portability move under the normal portability rules.

23.6 Termination of Assistance

As a condition of receiving HCV rental assistance, the VASH eligible family must receive case management services from the VAMC or a Community Based Outpatient Clinic (CBOC). Therefore, a VASH participant’s assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC or a CBOC.

CHA will utilize its discretion to consider all relevant circumstances of a veteran's specific case and will work with the VA case manager prior to issuance of a proposed termination of assistance for violation of family obligations under the voucher.

In the case of unreported income, CHA will provide the VASH participant with an opportunity to execute a repayment agreement at a reasonable monthly amount affordable to the veteran. In the case of a lease violation including misdemeanor criminal activity, CHA will work with the VA case manager and the veteran's landlord, if applicable, prior to issuance of a proposed termination of assistance for violation of family obligations under the voucher.

If the VAMC determines that case management is no longer required, CHA will offer the Veteran the choice of a unit at a Project Based Voucher property or a tenant-based voucher and the VASH voucher will be freed up for another eligible Veteran referred by the VAMC.

23.7 Payment Standards

CHA has established Exception Payment Standards for Veterans with disabilities equal to 120% of the HUD Published Fair Market rent as a reasonable accommodation. Payment Standards for any non-disabled Veteran will be equal to 110% of the HUD Published Fair Market Rent. However, the rent to owner for a unit selected by the Veteran is still subject to rent reasonableness.

HOUSING AUTHORITY OF THE CITY OF COLUMBIA, SC

RESOLUTION 2020-025: Approval of Fiscal Year June 30, 2021 Operating Budgets

BACKGROUND

The operating budgets of the Housing Authority of the City of Columbia, SC ("Columbia Housing") have been carefully developed to reflect the goal to provide safe, decent, sanitary and affordable housing for low income families. The Operating Budgets for the Fiscal Year Ending June 30, 2021 contain an overall agency organization that is based on increased leasing to maximize the utilization of the Housing Choice Vouchers, the continuation of the property management of the agency's affordable housing, and the development of additional affordable housing through mixed financing. The Capital Fund budgets were prepared as part of the Agency Plan and address the modernization and revitalization strategic plan for the agency.

The fundamental organization goals are to ensure optimal efficiency in performing all agency functions with a direct correlation to the number of units in the housing stock and the housing development projects. The Authority operating budgets include all expenditures necessary to support and operate affordable properties, facilities, revitalization, and the administrative office.

General Budget Process:

Information in the Annual Budget Operating Income column represents the program level operating subsidy, projected dwelling rental income, management fees, and other fund level income. The salary and benefit expenses are based on the staff position control report. The Authority periodically reviews staffing levels and market comparability's for wages and benefits.

The payroll position control report budgeted each position to the specific development, Housing Choice Voucher Program or Central Office considering nature of the work performed, the number of units at each site or services performed. Based on the payroll position control report, the Central Office costs were budgeted with specific attention given to eligibility of direct expenses and indirect allocable expenses.

The Finance Department met with the Executive Director to review and discuss the proposed budgets. The proposed budgets include a 5% increase in the salary line item for a performance incentive. The performance incentive pay will range from one to five percent and based upon each individual employee's mid-year and annual performance evaluation. The total performance incentive pay per employee will not exceed 5%.

Major Budget Components:

All expenditures are budgeted in concert with costs associated with specific property and housing choice voucher management and administration services determined based on business activities and standard enterprise Generally Accepted Accounting Principle (GAAP) accounting requirements. Indirect (central office fee-for-service) costs are those that have been incurred for common or joint purposes. After Public Housing, Housing Choice Voucher or Business Activities direct costs have been determined and assigned directly to the Project or Program as appropriate; central office costs are those costs incurred for management, bookkeeping and asset management fees for the Public Housing and Housing Choice Voucher Program.

The operating budget project and program revenues include HUD operating subsidy, dwelling rents and all other revenue used to support each program or development.

The operating budget expenses include direct administrative costs, tenant services, utilities, maintenance, security, insurance, other general expenses, and non-routine or capital expenses to be paid with operating funds. These categories also include any Central Office Cost Center (COCC) front-line costs charged as fee-for-service. After Public Housing, Housing Choice Voucher or Business Activities, direct costs have been determined and assigned directly to the Program as appropriate; indirect COCC costs are those remaining to be supported by the fee-for-service revenue.

Low Rent Public Housing Program

Public Housing Operating Subsidy levels are based on the HUD project formula expenses with an estimate of 96.54% projected HUD proration percentage for 2020 and 90% projected HUD proration for 2021. Allen Benedict Court is entering the second year of asset repositioning and is receiving 50% of the project level revenue.

Housing Choice Voucher Program

Housing Choice Voucher Administrative Fee revenue is budgeted with a 79% HUD proration percentage based on the assumption of 98% utilization of the 4037 tenant based Housing Choice Vouchers under lease at an average housing assistance payment of \$630.

Summary

The Authority continues to access every facet of its operations and financial structure to ensure optimal efficiency and quality service to residents. Continued effort is focused on bringing about the physical transformation of the housing stock and providing the services of the Housing Choice Voucher Program. A recommendation is made to approve Fiscal Year Ending June 30, 2021 Operating Budgets.

RESOLUTION

WHEREAS, The Finance Committee have reviewed and are recommending Board approval of the following Operating Budgets for the fiscal year ending June 30, 2021:

Individual Departments

- Low Rent Public Housing
- Housing Choice Voucher Program
- Business Activities
- Central Office Cost Center
- ROSS
- HOPWA
- Continuum of Care
- Mainstream
- Mod Rehab

WHEREAS, the proposed expenditures are necessary for the efficient and economical support of the operation of the programs of the agency for the purpose of serving low-income families, elderly and the disabled.

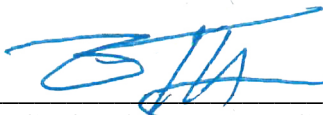
WHEREAS, the financial plan is reasonable in that it includes sources of funding and reserves adequate to cover all proposed expenditures.

THEREFORE, BE IT RESOLVED that the fiscal year ending June 30, 2021 Operating Budgets, copies of which are attached, are hereby approved by the Board of Commissioners of the Housing Authority of the City of Columbia, SC and the Executive Director is hereby authorized to take any and all necessary operating actions, including workforce re-alignment to maintain fiscal and operational efficiency of the Authority.

This 18th day of June, 2020

**BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF
COLUMBIA, SC**

BY:



ERNEST W CROMARTIE, III, CHAIRPERSON

Columbia Housing Authority
OPERATING BUDGETS

Fiscal Year Ending 6-30-2021

					Programs:		Budget Neutral Programs:				
Columbia Housing Authority	TOTAL Low Rent Public Housing	TOTAL Business Activities	TOTAL Blended Component Unit CHAD	TOTAL ALL PROPERTIES	Central Office Cost Center	Housing Choice Voucher	ROSS	Continuum of Care Mod Rehab HOPWA Mainstream	TOTAL AGENCY WIDE Annual Budget 6-30-2021	TOTAL AGENCY WIDE Projected YTD Actual 6-30-2020	Columbia Housing Authority
Unit Count	1641	323	234	2198							
Operating Income											Operating Income
Tenant Revenue	3,162,504	1,331,600	1,952,224	6,446,328	-	-	-	13,557	6,459,885	6,686,599	Tenant Revenue
HUD Operating Grant Revenue	8,498,609	-	-	8,498,609	-	2,590,930	213,436	413,325	11,716,300	12,269,065	HUD Operating Grant Revenue
HUD Capital Grant Revenue	-	-	-	-	747,415	-	-	-	747,415	1,358,286	HUD Capital Grant Revenue
COVID Operating Grant Revenue	924,007	-	-	924,007		238,745	-	-	1,162,752	700,749	COVID Operating Grant Revenue
COCC Fee Income and Other Revenue	68,500	-	154,912	223,412	2,566,293	4,000	-	46,707	2,840,412	2,822,378	COCC Fee Income and Other Revenue
Total Operating Income	12,653,620	1,331,600	2,107,136	16,092,356	3,313,708	2,833,675	213,436	473,589	22,926,764	23,837,077	Total Operating Income
Operating Expenses											Operating Expenses
Administrative Expenses	3,647,255	268,582	442,886	4,358,723	2,500,528	2,668,141	-	403,589	9,930,981	10,131,671	Administrative Expenses
Tenant Services	404,209	-	-	404,209	-	-	213,436		617,645	923,239	Tenant Services
Utilities	1,294,500	115,500	172,852	1,582,852	90,000	-	-	-	1,672,852	1,692,619	Utilities
Maintenance	4,953,446	489,897	630,525	6,073,868	420,000	-	-	50,000	6,543,868	6,382,579	Maintenance
Protective Services	369,531	26,068	-	395,599	52,782	-	-	-	448,381	764,359	Protective Services
Insurance Expense	292,000	52,400	96,623	441,023	37,100	-	-	-	478,123	465,757	Insurance Expense
Real Estate Taxes-PILOT	186,800	121,610	12,200	320,610	-	-	-	-	320,610	351,917	Real Estate Taxes-PILOT
Other General Expenses, Collection Losses	193,000	33,500	20,000	246,500	65,000	-	-	20,000	331,500	320,198	Other General Expenses, Collection Losses
Total Routine Operating Expenses	11,340,741	1,107,557	1,375,086	13,823,383	3,165,410	2,668,141	213,436	473,589	20,343,959	21,032,339	Total Routine Operating Expenses
Cash Flow (Deficit) from Operations	1,312,879	224,043	732,050	2,268,973	148,298	165,534	0	0	2,582,805	2,804,738	Cash Flow (Deficit) from Operations
Other (Uses) Sources of Cash Flow											Other (Uses) Sources of Cash Flow
less: Principal and Interest Payments	(216,300)	(629,044)	(680,650)	(1,525,994)	-	-	-	-	(1,525,994)	(1,525,994)	less: Principal and Interest Payments
less: Contribution to Replacement Reserves		-	(98,196)	(98,196)	-	-	-	-	(98,196)	(98,196)	less: Contribution to Replacement Reserves
Total Other (Uses) Sources of Cash Flow	(216,300)	(629,044)	(778,846)	(1,624,190)	-	-			(1,624,190)	(1,624,190)	Total Other (Uses) Sources of Cash Flow
Cash Flow (Use of Reserves) After Debt Service	1,096,579	(405,001)	(46,796)	644,783	148,298	165,534	0	0	958,615	1,180,548	Cash Flow (Use of Reserves) After Debt Service
Withdrawal - Transfer from Reserves		405,001	46,796	451,797					451,797	732,258	Withdrawal - Transfer from Reserves
ADJUSTED Cash Flow (Use of Reserves)	1,096,579	-	-	1,096,580	148,298	165,534	0	0	1,410,412	1,912,806	ADJUSTED Cash Flow (Use of Reserves)

Columbia Housing Authority

FYE June 30, 2021 - Routine Operating Budgets

Consolidated Public Housing	Projected Year to Date Actual 6-30-2020	Annual Budget 6-30-2021
<u>Operating Income</u>		
Tenant Revenue	3,346,534	3,162,504
HUD Operating Grant Revenue	9,372,517	8,498,609
COVID Operating Grant Revenue	462,004	924,007
Other Revenue	138,837	68,500
Total Operating Income	13,319,891	12,653,620
<u>Operating Expenses</u>		
Administrative Expenses	3,467,025	3,647,255
Tenant Services	709,803	404,209
Utilities	1,203,773	1,294,500
Maintenance	4,832,168	4,953,446
Protective Services	764,359	369,531
Insurance Expense	278,519	292,000
Real Estate Taxes-PILOT	214,276	186,800
Other General Expenses, Collection Losses	175,295	193,000
Total Routine Operating Expenses	11,645,219	11,340,741
Cash Flow (Deficit) from Operations	1,674,672	1,312,879
<u>Other (Uses) Sources of Cash Flow</u>		
<i>less: Principal and Interest Payments</i>	(216,300)	(216,300)
Total Other (Uses) Sources of Cash Flow	(216,300)	(216,300)
Cash Flow After Debt Service	1,458,372	1,096,579

Columbia Housing Authority

FYE June 30, 2021 - Routine Operating Budgets

Business Activities	Projected Year to Date Actual 6-30-2020	Annual Budget 6-30-2021
Operating Income		
Tenant Revenue	1,410,287	1,331,600
Total Operating Income	1,410,287	1,331,600
Operating Expenses		
Administrative Expenses	139,325	268,582
Tenant Services	-	-
Utilities	171,616	115,500
Maintenance	431,064	489,897
Protective Services	-	26,068
Insurance Expense	49,866	52,400
Real Estate Taxes-PILOT	123,141	121,610
Other General Expenses, Collection Losses	33,300	33,500
Total Routine Operating Expenses	948,312	1,107,557
Cash Flow (Deficit) from Operations	461,976	224,043
Other (Uses) Sources of Cash Flow		
<i>less: Principal and Interest Payments</i>	(629,044)	(629,044)
Cash Flow (Deficit) after Debt Service	(167,068)	(405,001)
Withdrawal - Transfer from Reserves	167,068	405,001
Cash Flow (Use of Reserves)	-	-

6-30-2020 Year to Date Actual does not include Petan for budget to actual comparison with 6-30-21

Columbia Housing Authority

FYE June 30, 2021 - Routine Operating Budgets

CHAD - Blended Component Unit	Projected Year to Date Actual 6-30-2020	Annual Budget 6-30-2021
Operating Income		
Tenant Revenue	1,916,221	1,952,224
Other Revenue	135,432	154,912
Total Operating Income	2,051,653	2,107,136
Operating Expenses		
Administrative Expenses	508,035	442,886
Tenant Services	-	-
Utilities	235,041	172,852
Maintenance	680,180	630,525
Protective Services	-	-
Insurance Expense	104,535	96,623
Real Estate Taxes-PILOT	14,500	12,200
Other General Expenses, Collection Losses	4,263	20,000
Total Routine Operating Expenses	1,546,554	1,375,086
Cash Flow (Deficit) from Operations	505,100	732,050
Other (Uses) Sources of Cash Flow		
<i>less: Contribution to Replacement Reserves</i>	(98,196)	(98,196)
<i>less: Principal and Interest Payments</i>	(680,650)	(680,650)
Total Other (Uses) Sources of Cash Flow	(778,846)	(778,846)
Cash Flow (Deficit) after Debt Service	(273,746)	(46,796)
Withdrawal - Transfer from Reserves	273,746	46,796
Adjusted Cash Flow	-	-

Columbia Housing Authority

FYE June 30, 2021 - Routine Operating Budgets

Central Office Cost Center	Projected Year to Date Actual 6-30-2020	Annual Budget 6-30-2021
<u>Operating Income</u>		
Management Fee Income	2,381,414	2,480,293
CFP Administrative Fee Income	1,358,286	747,415
Other Revenue	115,602	86,000
Total Operating Income	3,855,301	3,313,708
<u>Operating Expenses</u>		
Administrative Expenses	2,809,336	2,500,528
Utilities	82,189	90,000
Maintenance	389,167	420,000
Protective Services	0	52,782
Insurance Expense	32,837	37,100
Other General Expenses	87,340	65,000
Total Routine Operating Expenses	3,400,870	3,165,410
<i>Cash Flow from Operations</i>	454,432	148,298

Columbia Housing Authority

FYE June 30, 2021 - Routine Operating Budgets

	Projected Year to Date Actual 6-30-2020	Annual Budget 6-30-2021
Housing Choice Voucher Program		
<u>Administrative Operating Income</u>		
HUD Operating Grant Revenue - 79% HUD Proration	2,269,787	2,590,930
COVID Operating Grant Revenue	238,745	238,745
Other	4,386	4,000
Total Operating Income	2,512,917	2,833,675
<u>Operating Expenses</u>		
Administrative Expenses	2,804,361	2,668,141
Total Operating Expenses	2,804,361	2,668,141
<i>Withdrawal - Transfer from Reserves</i>	291,444	
<i>Cash Flow from Operations</i>	0	165,534
Housing Assistance Payments (HAP) to Landlords Calendar Year 2020 (HUD 2 year Tool)		
	2019	2020
HAP Subsidy + HUD Held Reserves	28,176,357	28,455,085
Housing Assistance Payments to Landlords	26,082,686	27,767,427
HUD Held HAP Reserves	2,093,671	687,658

FINANCIAL STATEMENT REPORTING DEFINITIONS

PROPERTIES

Low Rent Public Housing – These are properties owned by the Housing Authority that were built with development grants from HUD. These properties are restricted under a recorded Declaration of Trust and must operate under the regulations of the Federal Public Housing Program. Tenants pay 30% of their income for rent and HUD provides an annual operating subsidy and capital grant based on Congressional appropriations.

Business Activities – Business Activities includes non-governmental activities undertaken directly by the Authority such as development and property management of properties not owned directly by the Authority. Properties listed under Business Activities are properties owned directly by the Housing Authority that do not have any recorded restrictions. These properties were acquired with non-federal funds.

Current Properties included as Business Activities:

- ✓ Bentley Court
- ✓ Rosewood
- ✓ Carter Street
- ✓ English Meadows
- ✓ South Beltline
- ✓ Springwood
- ✓ Windsor Point
- ✓ Yorktown
- ✓ Petan (sold 11/14/2019)

Blended Component Unit - Blended component units are affiliates, instrumentalities or other entities that are controlled by the primary government (the Authority) that are presented in financial statements as part of the primary government. Blended component units include general activities of the non-profit affiliates: Columbia Housing Authority Developments, Inc; and SC Affordable Housing, Inc. as well as properties owned by these entities or a sole asset entity whose sole member is one of these entities.

Current Properties included as Blended Component Units:

- ✓ TS Martin
- ✓ Capital Heights
- ✓ Bay Berry Mews

Discrete Component Unit - Discrete component units for the Authority are Low Income Housing Tax Credit partnerships where an affiliate of the Authority is in the ownership structure but by nature of the tax credit program, owns a very small percent of the property, normally 1% or less. Equity investors are the major owners, normally 99% of the partnership. Thus, these entities are considered discrete component units.

Current Properties included as Discrete Component Units:

- ✓ Celia Saxon I
- ✓ Celia Saxon II
- ✓ Lorick (under construction)

PROGRAMS

Housing Choice Voucher Program – Formally known as Section 8, the Voucher Program is the largest program administered by the Housing Authority with 4,034 baseline vouchers. Columbia Housing receives two pots of funds from HUD for administration of the program:

1. **Housing Assistance Payments (HAP)** funds are restricted and can be used only for payment of rents to private landlords on behalf of the eligible program participants.
2. **Administrative Fees** are earned by the Authority for each voucher under contract on the first day of each month. These funds are less restrictive and can be used to cover all related program operating costs.

The Voucher Program has some special purpose vouchers that are funded separately from the general Voucher Program for specific populations. Columbia Housing currently receives funding for the following special Voucher Programs.

1. **VASH Vouchers** – The Veterans Administration Supportive Housing (VASH) Program is a collaboration between the Veterans Administration and HUD. The program provides vouchers for homeless veteran's that receive case management services from VA Case Workers. Vouchers can only be issued to referrals directly from the VA. Columbia Housing currently administers 414 VASH Vouchers.
2. **Mainstream Vouchers** – The Mainstream Program serves non-elderly, disabled persons. All components of the program operate the same as the general Voucher Program but a separate waiting list is maintained for individuals who meet the criteria for these vouchers. Columbia Housing currently has 140 Mainstream Vouchers.
3. **Moderate Rehabilitation** – The Mod Rehab Program provides subsidy to a property that underwent a moderate amount of rehabilitation at the time the property was first selected for the program. A separate waiting list is maintained for each property. Columbia Housing currently has 5 Mod Rehab properties with 109 units.

Central Office Cost Center (COCC)- The COCC is a business unit within the Authority that is the recipient of fee income to reimburse the central office overhead costs incurred in administering the Public Housing and Housing Choice Voucher programs. Such fees include property management, bookkeeping, and asset management fees. COCC is only for central overhead type costs. Direct program costs are recorded and funded by the specific property or program.

ROSS - Resident Opportunities and Supportive Services Programs – This program is a competitive grant funded by HUD on a three-year basis. Funds are restricted to payment for Service Coordinators to connect Public Housing residents with community resources. Columbia Housing Authority is currently receiving a HUD ROSS grant for two coordinator positions.

Summer Food Service Program – This is a grant issued by the U.S. Department of Agriculture and is an extension of the school lunch program for low-income children to continue to receive meals during the summer months when school is not in session. Funds are restricted specifically for operation of the meal program.

Continuum of Care (COC) - The Continuum of Care (CoC) is the Regional Homeless Coalition that receives grant funding directly from HUD's Office of Special Needs Assistance Programs (SNAPS). United Way of the Midlands is the primary grant recipient. Columbia Housing is a sub-grantee and receives grant funds to administer permanent supportive housing. Currently Columbia Housing has two grants that require that 100% of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability including unaccompanied homeless youth. Columbia Housing enters into "master leases" with private owners and provide direct case management services to the clients in this program.

HOPWA – Housing Opportunities for Persons with AIDS - The HOPWA program is funded and managed by HUD's Office of HIV/AIDS Housing. The City of Columbia is the primary grant recipient. Columbia Housing is a subgrantee and receives funding from the City for three different programs that serve individual and families with HIV/AIDS.