

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

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

Definitions.

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

A.	PHA Information.																										
A.1	<p> PHA Name: <u>Housing Authority of the City of Columbia, SC</u> PHA Code: <u>SC061</u> PHA Type: <input checked="" type="checkbox"/> Small PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>41</u> Number of Housing Choice Vouchers (HCVs) <u>0</u> Total Combined <u>41</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B. Plan Elements Submitted with 5-Year PHA Plans. Required elements for Small PHAs completing this document in years in which the 5-Year Plan is also due. This section does not need to be completed for years when a Small PHA is not submitting its 5-Year Plan. See sub-section below for required elements in all other years (Years 1-4).

B.1 Revision of Existing PHA Plan Elements.

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

Y N

Statement of Housing Needs and Strategy for Addressing Housing Needs.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.

Financial Resources.

Rent Determination.

Homeownership Programs.

Substantial Deviation.

Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

Rent Determination (Payment Standard Changes, utility allowances, flat rents)

- 1) Payment Standards - Columbia Housing will continue to utilize waivers received under PIH2022-30 authorizing Housing Choice Voucher payment standards at 120% of the published fair market rent and an increase in payment standards during the HAP contract term.
- 2) Utility Allowances - Columbia Housing will utilize property specific utility allowances for all project-based vouchers and will contract with a third party for the analysis.
- 3) Flat Rents – CH established flat rents that are based on comparable to standards not less than 80% of the Fair Market Rents.:
 - HCV Rent reasonableness study.
 - Guidelines found in PIH 2017-23 in determining PH Flat Rent Schedule
 - Survey of similar unassisted units in the neighborhood

Admissions and Occupancy

- 1) HCV Admin Plan Changes
- 2) ACOP Changes
 - **Missed Appointments** – Applicants will be offered the right to an information review after being removed from the waiting list. The request for informal review must be in writing no later than 30 days from the date of the missed appointment.
 - **Selection From the Waiting List** – All applicants will complete a pre-application which if selected by the lottery and approved, will place them on the waiting list from the Public Housing Program provided by Columbia Housing.
 - **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: CH’s Drop Box at the Central Office (24 hours a day), By mail, credit card, and online at www.columbiahousingsc.org.
 - **Interim Re-examinations** – Families are required to report all changes to the family household composition within ten (10) days of their occurrence. These changes include a member who has been added to the family through birth, adoption, or court-awarded custody, and a household member is leaving or has left the family.
 - **Abandonment** – The South Carolina Code of Laws 27-40-730, a property may be considered abandoned if the tenant has been absent for more than 15 days after defaulting on a payment. The 15-day rule does not apply, however, if a tenant voluntarily shut off the utilities at the time of default on the payment.

POLICY CHANGES FOR PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM

Columbia Housing will amend the Public Housing Admissions and Occupancy Policy and the Housing Choice Voucher Administrative Plan to adopt all provisions of the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) effective **January 1, 2024**.

Section 102: Income Reviews

- Interim Recertifications: A 10% adjusted income increase/decrease threshold will be used for conducting Interim Recertifications, and increases in earned income will not be processed until the next Annual Recertification.
 - Income Decrease - Columbia Housing will not conduct an interim recertification if the family's adjusted income will decrease by an amount that is less than 10% of the family's annual adjusted income.
 - Income Increase - Columbia Housing will not conduct an interim recertification if the family's earned income has increased. Columbia Housing will conduct an interim recertification if the family's annual adjusted income has increased by more than 10% from other sources of income.
 - Three Month Period - Columbia Housing will not conduct any interim recertifications if the request for an interim is within 3 months of the family's regularly scheduled recertification.
- Streamlined Verifications: Several provisions will streamline the verification process include
 - Adults Only Need to Sign Consent Form Once: The required consent form that all adult household members sign will be signed only once instead of annually.
 - Use of Income Determinations from Other Programs: Use income determinations made under other federal benefits programs for recertifications.
 - Review of EIV Not Required at Interim Recertification: Eliminate the requirement to use EIV to verify tenant employment and income information during an interim recertification.
- Increased Standard Deduction for Elderly/Disabled Households: Standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability is increased from \$400 to \$525 adjusted by HUD annually.
- Additional Income Exclusions: Additional income and asset exclusions, including:
 - Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home.
 - Veterans' aide and attendant care
 - Distributions of principal from non-revocable trusts, including Special Needs Trusts.
- Threshold for Claiming Medical/Disability Expenses Increased: Increased allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.
 - Hardship Relief: Grants hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Eligibility for Relief - To receive hardship relief the family must have received a deduction from annual income because their sum of expenses exceeded 3% of annual income as of January 1, 2024.

Form of Relief - The family will receive a deduction for the total sum of eligible expenses that exceed 5% of annual income; 12 months after relief family must receive deduction totaling 7.5% of annual income; 24 months after relief family must receive deduction totaling 10% of annual income.

- Higher Threshold for Imputing Asset Income: Raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

SECTION 104: ASSET LIMITS

- Asset Limitation: A \$100,000 asset limit for eligibility and continued assistance. Families are ineligible for assistance if assets exceed this limit or if they own real property suitable for occupancy. Columbia Housing will delay enforcement/termination for up to six months if the family is over the asset threshold at the time of annual recertification.
- Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset.
- Self-Certification of Assets under \$50,000: Self-certification of net assets will be used if estimated to be at or below \$50,000.

OTHER

- Streamlined Recertifications for Fixed Income Households - Columbia Housing will implement streamlined requirements for verifying and adjusting fixed income sources over a three-year cycle for families with an unadjusted income consisting of 90 percent or more from fixed income sources. In the initial year of a three-year cycle, CH will complete an annual income determination consistent with all applicable HUD regulations and guidance. In the second and third year of the three-year cycle, CH will obtain from the family a certification that their fixed income sources have not changed, and that the family's income is still made of at least 90 percent from fixed income sources. If the family provides that certification in years two and three, CH will adjust the family's fixed income sources by the Cost of Living Adjustment (COLA) that is applicable to that fixed income source instead of fully reverifying and recalculating the income source. CH will provide a reexamination of non-fixed incomes sources, if applicable by applying the same inflation factor.
- Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually by HUD, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance.

POLICY CHANGES APPLICABLE TO THE PUBLIC HOUSING PROGRAM ONLY

SECTION 103: PUBLIC HOUSING INCOME LIMIT

- Public Housing Income Limitation: Continued program participation limits for families exceeding the statutory income limitation in the Public Housing program, also known as the "over-income" provision will be effective June 14, 2023.
- Over Income Limit – The over income limit is established by multiplying the very low-income limit by a factor of 2.4.
- Non-Public Housing Over Income Family: A family whose income exceeds the over income limit for 24 consecutive months.
- Alternate Non-Public Housing Rent: Columbia Housing will adopt the Section 8 Fair Market Rent as the Public Housing Alternate Rent.
- Notification to Over-Income Families – If a family is over-income at a regular recertification of income, Columbia Housing will notify the family that they are over-income and exceeding income limits for 24 consecutive months will result in conversion to a Non-Public Housing Over Income Family (NPOIF) and payment of the alternate Non-Public Housing Rent. Columbia Housing will not terminate tenancy.
 - A second recertification will be conducted at 12 months and the family if the family continues to be over-income, the family will be notified that if they continue to be over-income for an additional 12 months (24 consecutive months) they will convert to a NPOIF and pay the alternate Non-Public Housing Rent.
 - The family may request an interim recertification at any time during the 24-month period and if the recertification results in a decrease in income so that they no longer are over-income the will remain an eligible Public Housing Family.
 - An Interim recertification will be conducted if requested by the family within 6 months prior to the conversion to a NPOIF.
 - The family shall be entitled to a hearing if the dispute the over-income determination.
 - Upon notification of the conversion to a Non-Public Housing Over Income Family, Columbia Housing will provide the family with a new lease. The family must sign the new lease within 60 days from offer; failure to sign the new lease will result in termination of tenancy.

POLICY CHANGES APPLICABLE TO THE HOUSING CHOICE VOUCHER PROGRAM ONLY

Section 3.4 of the Housing Choice Voucher Program has been revised as noted below.

	<p>The attached Chapter 25 has been added to the HCV Administrative Plan for the Rental Assistance Demonstration Program.</p> <p><u>Pet Policy changes</u></p> <ul style="list-style-type: none"> • There are no proposed changes to the Pet Policy <p>Substantial Deviation</p> <ol style="list-style-type: none"> 1. Additions or deletions of Strategic Goals 2. Any deviation that requires reviews and input by the Resident Advisory Board as well as approved by the Board of Commissioners. <p>Significant Amendment/Modification will include the following:</p> <ol style="list-style-type: none"> 1. Any change with regard to a proposed public housing Section 18 action; and 2. Any change to rent or admissions policies or organization of the waiting list <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> <ol style="list-style-type: none"> 1. 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; 2. Changes to the financing structure for each approved RAD conversion; 3. Changes to the construction and/or rehabilitation plan for each approved RAD conversion; <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
<p>B.2</p>	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>1. Increase availability of quality, affordable housing by improving the quality of assisted housing.</p> <p>OBJECTIVES:</p>

- Continue public housing high performing status, with the public housing assessment strategy of ninety percent (90%) or greater.
- Maintain the public housing vacancies at a rate of two percent (2%) or less.

PROGRESS:

- Cayce is a Standard Performing Agency with a score of 76% of its last Assessment from HUD.
- The current occupancy rate is 100%.

2. Promote self-sufficiency in assessment development of families and individuals.

OBJECTIVE:

- Increase the percentage of employed persons in assisted housing.

PROGRESS:

- Established a plethora of economic and self-sufficiency opportunities for residents, by enlisting community partners and leveraging subject matter experts to deliver a COVID-19 friendly series of virtual workshops that foster economic independence and self-sufficiency. The series consists of monthly online sessions in the areas of:
 - Career Development/Employment Programs,
 - Education,
 - Financial Literacy Workshops,
 - Health & Safety,
 - Technology,
 - Youth Life Skills and Career Readiness,
 - Senior Activities and Programs.

3. Ensure Equal Opportunity in providing Fair Housing for all.

OBJECTIVES:

- Continue affirmative measures that will facilitate access to suitable living environment regardless of race, color, national origin, religion, sex familial status and disability.
- Continue affirmative measures that will prove acceptable for persons with disabilities regardless of the unit size required.

PROGRESS:

- Review annually to ensure that practices are not in place that violate Fair Housing regulations.
- Residents are provided with information on their rights under Fair Housing during initial lease-up.
- The CH Cares Coordinator handles resident complaints, hearings, and manages other issues and concerns brought forward by residents.
- CH ensures that team members participate in fair housing training annually.
- Standard Operating Procedures for Grievance Hearings were developed to ensure that residents are prepared and have a fair hearing process.

4. Convert forty-one (41) public housing units to project-based vouchers.

OBJECTIVE

- Convert and close out the public housing program.

PROGRESS:

- Completed \$1.2 million dollars in renovation work.
- Submitted a conversion application in May 2023.
- Conversion approval will be completed by December 2024.

Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.

Cayce Housing's 5-Year Plan was approved 9.19.2023

B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
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Plan Elements Submitted All Other Years (Years 1-4). Required elements for all other fiscal years. This section does not need to be completed in years when a Small PHA is submitting its 5-Year PHA Plan.

B.1	<p>New Activities</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization. <input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process.</p> <p><u>DEMOLITION/DISPOSTION</u></p> <p>Cayce Housing will dispose of its 41 Public Housing units and exit the Public Housing Program. The existing units will be disposed under 24CFR 970.17:</p> <p>Very Small PHA - The PHA owns and operates 50 or fewer public housing units under its ACC and has determined that it is in the best interests of the residents and PHA to close out its Section 9 public housing program in accordance with Notice PIH 2016-23</p> <p>(c) If using Project-Based Vouchers, provide the projected number of project-based units, general locations, and describe how project-basing would be consistent with the PHA Plan.</p> <p>Cayce Housing will conduct rehab prior to disposition and PBV 41 units post conversion. There will also be new construction of 6-8 units with PBVs.</p> <p>Under its Management Agreement with Columbia Housing, the PBV’s will be administered by Columbia and Columbia will provide Choice Mobility option to the residents utilizing the applicable Housing Choice Voucher portability provisions.</p> <p>(d) The PHA must submit its Deconcentration Policy for Field Office Review.</p> <p>Cayce Housing’s management agent, Columbia Housing has submitted the Deconcentration of Policy for Field Office Review. Cayce has less than 100 units and does not require analysis.</p>
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B.2	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See attachment for Capital Fund Plan</p>
<p>C Other Document or Certification Requirements for Annual Plan Submissions. Required in all submission years.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p><i>The RAB meeting was held on February 27, 2024, at noon. The comments and recommendations are included in the RAB Consultation Process and Comments.</i></p>
<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SI, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>	
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-CRT-SM, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>	
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to</p>

complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item

Fair Housing Goal: Continue affirmative measures to ensure access to provide suitable living environment regardless of race, color, national origin, religion, sex, familial status, and disability.

Describe fair housing strategies and actions to achieve the goal

Continue affirmative measures to ensure access to suitable living environment regardless of race, color, national origin, religion, sex, familiar status and disability.

- Policies are reviewed annually to ensure that practices are not in place that violate Fair Housing regulations.
- Residents are provided **with** information on their rights under Fair Housing during initial lease-up.
- The CH Cares Coordinator handles resident complaints, hearings, and manages other issues and concerns brought forward by residents.
- CH ensures that team members participate in fair housing training annually.
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