

**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

**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 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning **04/2020**, 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).

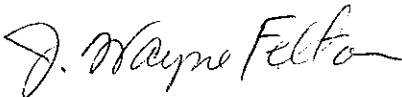
Housing Authority of the City of Raleigh
 PHA Name

NC-002
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2020

5-Year PHA Plan for Fiscal Years 20__ - 20__

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

Name of Authorized Official J. Wayne Felton	Title Executive Director
Signature 	Date 1/10/2020

Residents were asked to review the plan during regular Inter-Community Council meetings.

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

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

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

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

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

Significant Amendment/Modification: RHA defines a significant amendment/modification as a change that would affect a majority of program participants, or a change that cause large sections of the current plan to be out of date, inaccurate, or result in a change in the way that RHA delivers its services. Significant amendments/modifications are cause to amend or modify the plan during the program year. If the change is only a short term change, i.e. less than one year, then it is not considered significant.

(b) The PHA must submit its Deconcentration Policy for Field Office Review: N/A – There is only one public housing community, Heritage Park, covered by the *Deconcentration Rule*. Any RHA properties with fewer than 100 units or those who are designated as elderly are not subject to the Deconcentration Rule.

(c) If the PHA answered yes for any element, describe the revisions for each element below: See separate postings referencing changes to both the Public Housing *Admissions and Continued Occupancy Plan* and the *Administrative Plan* for the Housing Choice voucher program. Both policies were approved by the RHA Board of Commissioners on December 5, 2019. (See attachment)

<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 checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><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. 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>Raleigh Housing Authority is has applied for RAD and seeking to implement Project Based Vouchers at any converted properties. All public housing properties were included on the RAD application with the expectation of removing some of them prior to closing.</p> <p>RHA is currently strategizing future plans for protecting and increasing the affordable housing within the city of Raleigh. This approach includes the demolition and redevelopment of the Heritage Park community. Currently, RHA is in the very initial stages of research. Residents, an architecture firm, and City of Raleigh officials have been consulted in reference to potential redevelopment. RHA will continue to explore the potential for redevelopment during the 2020-2021 fiscal year.</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>The Raleigh Housing Authority continues to seek and develop strategies to reduce the cost of operating Public Housing and administering the Housing Choice Voucher program. RHA continues to house families in Public Housing program as units become vacant. Currently, RHA's Housing Choice Voucher program is fully leased and utilized.</p> <p>RHA continues to pursue non-federal sources for funding affordable housing.</p> <p>All agency initiatives will be evaluated to determine their effectiveness and to determine whether the program should be expanded, maintained or eliminated.</p> <p>See attachment.</p>
<p>B.4.</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>Other Document and/or Certification Requirements.</p>	

C.1	<p>Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations.</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.2	<p>Civil Rights Certification.</p> <p><i>Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations.</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> RHA met with the Resident Advisory Board (RAB) on November 25, 2019. The RAB did not have any comments on the PHA Plan.</p> <p>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>
C.4	<p>Certification by State or Local Officials.</p> <p><i>Form HUD 50077-SL, 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>
D	<p>Statement of Capital Improvements. Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
D.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. The 5-Year Action Plan was approved by HUD on February 17, 2016.</p> <p>Statement of Capital Improvements. RHA receives funding from the Capital Fund Program (CFP).</p> <p>D.1 Capital Improvements. In order to comply with this requirements, RHA is referencing the most recent HUD approved Capital Fund 5 Year Action Plan.</p> <p><i>See HUD Form 50075.2 approved by HUD on February 17, 2016.</i></p>

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(c))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Annual Plan.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(1) and 24 CFR §903.12(b). 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. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(2)(i) and 24 CFR §903.12(b).

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

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. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b)).

Safety and Crime Prevention (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. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define "significant amendment/modification", HUD will consider the following to be "significant amendments or modifications": a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

Hope VI. **1)** A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. **1)** A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, 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. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. 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. (24 CFR §903.7(h))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.

C.2 Civil Rights Certification. Form HUD-50077 SM-HP, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the 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. (24 CFR §903.7(o))

C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.4 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)

D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

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 the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 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.

**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, Ruffin L. Hall, the City Manager of the City of Raleigh
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 Raleigh
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 Raleigh – Wake County – State of North Carolina
Local Jurisdiction Name

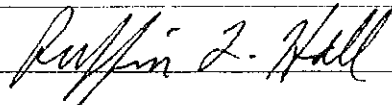
Pursuant to 24 CFR Part 91.

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

Raleigh Housing Authority provides quality, affordable, and subsidized housing to the citizens of Raleigh. The housing provided meets the growing need of families whose household income falls at or below 80% of the Area Median Income. Many of the household incomes fall as low as 30% of the Area Median Income.

In 2017, the City of Raleigh-Wake County, North Carolina initiated a process called Coordinated Entry to improve the delivery of housing and crisis response services and assistance for people experiencing homelessness. Raleigh Housing Authority continues to participate and provide a number of vouchers specific for those assessed under this Coordinated Entry System.

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
Ruffin L. Hall	City Manager
Signature 	Date 01/03/2020

Raleigh Housing Authority (RHA) 2020-2021 Annual Agency Plan Attachment

Below is a description of the items addressed in the Agency Plan template:

B.1 Revision of PHA Plan Elements

Statement of Housing Needs and Strategy for Addressing Housing Needs:

Housing Needs

The regional Analysis of Impediments to Fair Housing makes a number of recommendations to address areas of concern. The following is a summary of the areas RHA addressed as was suggested in the analysis completed in 2015:

- The development of affordable housing should be directed to high opportunity areas, when possible.
- Implement transportation policies that provide protected classes with better access to high opportunity areas.
- The analysis also recommends that local governing bodies pass ordinances that prohibit discrimination based on source of income. The purpose is to expand opportunities for families using voucher assistance.
- Need to increase stakeholder awareness of fair housing and ensure they are taking steps to meet their legal obligation to affirmatively further fair housing. Fair housing training and information is needed for non-governmental entities such as mom and pop landlords, churches, HOAs, and other groups that are not familiar with fair housing laws. In response, RHA participates in the City of Raleigh's Landlord Training Program to market the voucher program to the landlords attending the training. Many of the attendees are new landlords or landlords with only a few units. Many are not familiar with the voucher program.
- RHA is a part of the Wake County Affordable Housing Committee formed by Wake County Commissioners in 2017.
- RHA is a member of the Wake/Raleigh Partnership to End Homelessness. The partnership plays a key role in developing and leading community initiatives and programs that directly address barriers the homes population faces to receive housing and many other needs.
- RHA continues to work with the community as a partner to agencies, individuals and businesses to develop strategic goals and solutions to the affordable housing shortage in Raleigh.
- The Raleigh Housing Authority (RHA) remains committed to protecting and increasing the affordable housing within the city of Raleigh. This approach may include purchases, redevelopment, demolition and/or disposition.

- RHA intends to use whatever tools are available to increase housing choice under the voucher program.
- RHA encourages voucher holders to look outside poverty areas to secure housing. RHA provides a computer with an on-line connection so voucher holders can look for housing in a cost effective and timely manner. Certain sites that specialize in advertising units that accept vouchers are bookmarked on the system. Staff is available to offer assistance.
- Provisions in the Continuums of Care (CoCs) program interim rule (24 CFR 578.7(a)(8)) require that CoCs establish a centralized or coordinated assessment system. The goal of this coordinated system is to ensure individuals experiencing homelessness know where and how to access a system established to identify, assess, and prioritize their needs for services and housing. In Raleigh, our CoC has a coordinated entry system in place. Since 2017, RHA has implemented a local preference to accommodate referrals through this system. Over 45 vouchers have been issued to date.
- Housing Choice Voucher applicants have additional local preferences offered to them in order to assist in addressing the housing needs of families who reside in the jurisdiction Raleigh Housing Authority serves.
- Waiting List Preferences are offered to both public housing and Section 8 applicants. These preferences provide structure to the waiting list and impact the order in which individuals receive assistance. The following preferences are available to one or more waiting lists:
 - Elderly and/or disabled
 - Residency – lives or works in Wake County
 - Working preference
 - Graduate of the “Ready to Rent” program
 - Mobility impairment
- Local Preferences are offered to Section 8 applicants which allows them to bypass the regular waiting list due to various factors. RHA’s local preferences include:
 - **VAWA**– The Housing Authority offers referrals for voucher housing assistance, based on voucher availability, to individuals who present a claim for initial assistance based on incidents of actual or threatened domestic violence, dating violence, sexual assault, stalking, or criminal activity related to any of these forms of abuse.
 - **Coordinated Entry referrals**– In continued support of the city of Raleigh’s initiative to coordinate services established to end homelessness; RHA has agreed to offer a local preference to housing choice voucher applicants received through the Continuums of Care coordinated entry system. Those referred through this system must be homeless families that have been recognized to be in the greatest of need. The referrals must still meet all other eligibility requirements for voucher assistance. The number of referrals was increased from 20 vouchers to 30 vouchers during the 2019 fiscal year to accommodate the growing needs of our area. Assistance via Coordinated Entry referrals will increase from 30 vouchers to 50 vouchers for homeless families for the 2020 fiscal year.

- **Olmstead Referrals-** RHA offers a local preference to housing choice voucher applicants received through Alliance Health/NC Housing & Finance Agencies coordinated entry system. This preference will support the efforts of the State of North Carolina to increase housing opportunities that are available for individuals with disabilities who are transitioning from, or at serious risk of entering, institutions, hospitals, nursing homes, adult care facilities, and other restrictive, segregated settings. Families referred through the system must meet the Olmstead requirements for voucher assistance. This assistance will provide vouchers for up to fifteen (15) voucher families per RHA fiscal year as vouchers are available. This number was increased from five (5) vouchers during the 2019 fiscal year to accommodate the growing needs of our area.
- RHA applied for Mainstream Vouchers through a HUD grant. This grant would have supplied additional vouchers for non-elderly disabled individuals. RHA did not receive the award funding this time around, but will continue to evaluate reapplying for future awards.

Deconcentration Efforts

- RHA provides for deconcentration of poverty and encourages income mixing by bringing higher-income families into lower-income communities and lower-income families into higher-income communities. In partnership with various supportive service providers, RHA offers programs that help residents achieve self-sufficiency.
- RHA will continue to offer the Incentive Public Housing program and working preferences.
- Created income diversity within our redeveloped housing communities, including those redeveloped under the HOPE VI grant program.
- Encourage families receiving vouchers to consider relocating in neighborhoods that will improve the life opportunities of family members.
- RHA properties with fewer than 100 units or designated as elderly are not subject to the Deconcentration Rule.

Significant Amendment/Modification

- Annual review and update to both the public housing *Admission and Occupancy* and the Leased Housing *Administrative Plan*.
- See attached Executive Summary for changes to the *Admissions and Occupancy Policy – Public Housing*.
- See attached Executive Summary for changes to the *Administration Policy – Housing Choice Voucher/Section 8*.
- RHA plans to continue to evaluate and strengthen its screening criteria as it relates to applicant suitability for occupancy without creating a practice that may have an adverse or “disparate impact” on protected classes and placement on the waiting lists.

- RHA continues to review its domestic violence policy and emergency transfer policy to be consistent with HUD regulations. RHA will continue to relocate program participants and residents who are victims of domestic violence as an emergency transfer.
- Conduct an annual review and adjustments as needed to the 2019 Flat Rent schedule.
- Conduct an annual review and adjustments as needed to the 2019 Utility Allowance schedule.
- Annual review was conducted and the only update to the charges on the public housing resident *Maintenance Charge List* was to change the rate for Electricians and Plumbers from \$83/hour to \$85/hour.

B. 2 New Activities

Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). Units with Approved Vacancies for Modernization.

- The Raleigh Housing Authority (RHA) is strategizing which option would best serve to protect and increase the affordable housing within the City of Raleigh. This approach can include purchases, redevelopment, demolition and possibly disposition.
- RHA will continue to explore the option of seeking designation as a Moving to Work Agency. RHA will consider its options to determine whether this change is advantageous to RHA and its residents.
- HUD continues to encourage housing authorities to convert public housing units under the Rental Assistance Demonstration (RAD) to voucher-based funding. RHA submitted applications to HUD to participate in the RAD program in 2019.
- RHA applied to convert public housing to a Project Based Voucher program through our RAD applications. Adding a Project Based Voucher (PBV) portfolio seeks to enhance the number of affordable housing rental units developed within our city.
- RHA applied for a federal grant that would have added Mainstream Vouchers to our housing portfolio. Mainstream Vouchers can be utilized by non-elderly, disabled low-income individuals.
- RHA is partnering with Alliance Health through the Olmstead referrals.
- RHA may seek HUD approval to sell some of its single-family public housing units offering a preference to public housing residents who qualify to purchase. Historically, these homes are among the most expensive to maintain. HUD will have to approve this disposition before any of the units can be sold.
- If the sale of single family public housing should occur, RHA may acquire replacement public housing in other communities within the city that more closely reflect RHA's current standards. HUD will have to approve this purchase before any of replacement units can be purchased.
- Housing Needs – RHA looks at the waiting list as a starting point for considering local housing needs. The current waiting list indicates that the majority of public housing applicants are seeking a one or two bedroom unit. Many applicants are on both the Public Housing and the Housing Choice Voucher waiting lists because many families will

accept first available housing until their admission to their desired program. We will also look at other sources of information regarding the need for affordable housing by considering data provided by the City and County.

- RHA intends to use whatever tools available to increase housing choices for voucher participants. RHA remains committed to developing additional marketing tactics to attract new landlords while retaining landlords under the HCV program. These ideas may include adjusting the Fair Market rents. RHA realizes it cannot expect to compete with current rising market rents trending in Wake County.
- RHA will continue to pursue reimbursement of termination of assistance for participants in the Public Housing and Section 8 programs who failed to report income in a timely manner. This also includes false documentation or false reporting of any kind, not just income.
- RHA plans to promote rent readiness guidelines to low income housing applicants while they are on the waiting list. RHA offers a preference for all current graduates of the Wake County Ready to Rent (RTR) program. This preference is for voucher applicants who have successfully graduated from the RTR program.
- Applicants will be encouraged to utilize their wait time for a HCV to improve their credit worthiness, rental references, and increase their income. Such efforts should make it easier to secure a landlord when their name reaches the top of the waitlist.
- In an endeavor to mobilize current residents towards economic self-sufficiency, RHA plans to continue to strengthen its working relationship with nonprofits and local educational institutions in the area. These partnerships allow staff to refer residents who request help with life skills, job training programs, or home ownership counseling.
- In response to HUD and Department of Justice (DOJ) guidance, RHA aims to prevent sexual harassment in housing by providing education to all employees, applicants and housing participants. Education is shared at all briefings for both Section 8 landlords and voucher holders.
- RHA maintains the agency website with contact information, pertinent documents and emergency announcements which improve communication with residents, housing applicants, and Section 8 landlords.
- RHA is working with the City of Raleigh Solid Waste division to offer recycling collection in all of our communities.
- RHA continues to work with internet providers to bring high-speed internet to public housing households free of charge where possible.
- RHA is in the process of obtaining signature pads for applicant and resident meetings. This will be included as a way to lessen the burden on individuals and staff.
- Staff is in the process of implementing online payment methods for rent and other fees. Online services will add an additional way of making payments to provide residents greater choice and flexibility.

B.3 Progress Report

Progress toward Five-Year Plan Goals

- Making necessary adjustments for modernization, RHA maintained a satisfactory vacancy rate.
- Maintained operational standards as a distinguished high performing public housing agency.
- Conduct compliance reviews based on Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA). Reviews such as this look at a sample of public housing developments and conduct physical surveys of dwelling units, including the designated accessible routes and access to common areas.
- RHA continues to partner with the nonprofit sector toward ending homelessness. The agreement term of our partnership with the Support Circle expired in May 2019. Due to higher utilizations and the growing needs of other local preferences, the 20 vouchers set aside for Support Circle were realigned with other preferences. Catholic Charities still has access to local preference vouchers through the Coordinated Entry program.
- RHA secured approval from the U. S. Department of Housing and Urban Development (HUD) to designate Glenwood Towers and Carriage House communities as housing for families age 50 and older through September 20, 2020.
- RHA collaborated with the Raleigh Police Department (RPD) in several communities located downtown whose crime rate has increased due to elements in properties adjacent to RHA's. RHA contracts with the RPD for additional coverage in communities experiencing a spike in criminal activity.
- RHA continues to modernize its public housing units as needed and as funding allows.
- Maintain surveillance cameras, and add additional cameras/upgrade as funds allow. Software is in place at some communities which permit the police to log in to the network and view the communities in real time.
- RHA's audit was presented to the RHA Board on September 26, 2019. There were no financial audit findings for the 32nd consecutive year. The audit also resulted in a favorable review of a percentage of both public housing resident files and voucher participant files.
- RHA annually reviews the number of current families receiving rental assistance whose income has risen and now exceeds current income limits in accordance through the Housing Opportunity Through Modernization Act of 2016 (HOTMA).
- RHA has joined the local partners of the City of Raleigh, Wake County, Town of Cary, and the Wake County Housing Authority to complete the Analysis of Impediments. The 2020 analysis has been initiated with Mullin and Lonergan Associates.

D. Capital Fund Program

RHA receives HUD funding through the Capital Fund Program (CFP) to assist with modernization, development, and renovation of public housing units community-wide, and as a way to ensure long-term physical and social viability of the communities. The following work items are either underway or recently completed:

- Continued installation of security cameras throughout sites as needs are identified including the addition of new cameras to Birchwood, Chavis Heights, Mayview, and Glenwood Towers.
- Replacement of outdated plumbing in a 60 unit development as units are turned during vacancies.
- Asbestos abatement portfolio wide.
- Installation of new luxury vinyl-plank flooring during vacancy turns.
- Planned roof removal and replacement at 14 story senior building Glenwood Towers.
- Exterior caulking replacement and waterproofing at Glenwood Towers.
- Emergency façade repair at Glenwood Towers.
- Planning new fire alarm system installation at Carriage House
- Planning lenth repair and replacement as well as additional securing of façade at Glenwood Towers.
- Planning repaving of private roads and parking at two developments.
- Planning new flooring of first floor common areas at Carriage House.
- Lead Based Paint testing at all pre-1978 multifamily developments.

Violence Against Women Act (VAWA)

Goals and Objectives

Raleigh Housing Authority (RHA) will comply with all requirements associated with the federal law, Violence Against Women Act, or “VAWA”. RHA adheres to this law in the development of policy and procedures.

Anyone eligible for public housing or for the Section 8 Housing Choice Voucher program (HCV), will not be refused admittance or terminated from the program solely because they are a victim of domestic violence, dating violence, or stalking.

Raleigh Housing Authority understands the importance of notifying applicants and residents of their rights under VAWA. For that reason, RHA posts copies of their rights in all Offices and on the Agency website. Notification of applicants and residents rights are also provided during instances of denial of housing notification, move-in orientation, incidents of domestic violence and during any notification of lease or housing assistance termination. There is an *Emergency Transfer policy* for residents seeking transfers due to domestic violence, dating violence, sexual assault and stalking which is posted throughout Agency offices in addition to being provided upon request.

VAWA and Other Laws

Raleigh Housing Authority recognizes that VAWA does not limit the housing authority’s or landlord’s duty to honor court orders about access to or control of a public housing unit. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up. VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault or stalking.

Housing Authority of the City of Raleigh

RESOLUTION NO. (2019)

WHEREAS, the Quality Housing and Work Responsibility Act of 1998 (QHWRA) requires the development of a comprehensive Agency Plan; and

WHEREAS, Raleigh Housing Authority ("RHA") is in the process of revising the annual and five-year plans to reflect actions to be effective April 1, 2020; and

WHEREAS, this plan has been made available to the public at various locations including RHA's main office and Property Management offices; and

WHEREAS, this plan has been posted on RHA's web page seeking public comment and announcing the public meeting to discuss the Agency Plan at 971 Harp Street on November 20, 2019 at 5:30pm; and

WHEREAS, a public notice was published in the *News and Observer* newspaper on October 20 and October 27, 2019 to announce the availability of the plan for public review and to encourage written comments; and

WHEREAS, RHA appeared at various public meetings with the City of Raleigh Housing and Neighborhoods Department and with other local housing advocates to advertise the plan was out for review and to encourage comments from the public; and

WHEREAS, no one attended RHA's public meeting or submitted any written comments; and

WHEREAS, RHA has met with the Resident Advisory Board ("RAB") to discuss this plan and did not receive any comments from the RAB; and

WHEREAS, the Agency Plan will be submitted to the City of Raleigh for a Certification of Consistency with the Consolidated Plan following Board Approval;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF RALEIGH that the Board Chair and Executive Director are authorized to sign the attached required certifications.

BE IT FURTHER RESOLVED that staff is directed to submit the Agency Plan to the U. S. Department of Housing and Urban Development for their approval prior to the January 16, 2020 due date.

Adopted:

Distribution:

All Directors
Special Assistants