

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	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-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small 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 Raleigh</u> PHA Code: <u>NC-002</u> PHA Type: <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2022</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1,444</u> Number of Housing Choice Vouchers (HCVs) <u>3,921</u> Total Combined <u>5,365</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>A public comment period for the draft Annual PHA Plan will commence on Friday, September 24, 2021 and conclude on Monday, November 22, 2021. RHA will hold public meetings via Zoom due to the COVID-19 pandemic at the following times: Wednesday, October 20, 2021 at 12:00PM; and Monday, November 15, 2021, at 6:00PM. Notice will be published in the local News and Observer.</p> <p>During the public comment period, RHA will make draft copies of the Annual PHA Plan available to the public. Drafts will be posted to the RHA website, www.rhaonline.com. Additionally, copies can be provided via email upon request, and hard copies will available at RHA's Administrative office located at 900 Haynes Street, Raleigh, NC 27604, as well as at all RHA Property Management offices.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" data-bbox="167 1917 1459 1957"> <thead> <tr> <th data-bbox="167 1917 440 1957">Participating PHAs</th> <th data-bbox="440 1917 581 1957">PHA Code</th> <th data-bbox="581 1917 1144 1957">Program(s) in the Consortia</th> <th data-bbox="1144 1917 1459 1957">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	No. of Units in Each Program				
Participating PHAs	PHA Code	Program(s) in the Consortia	No. of Units in Each Program						

				Program(s) not in the Consortia	PH	HCV
Lead PHA:						

B. Plan Elements

B.1 Revision of Existing 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 affects 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) If the PHA answered yes for any element, describe the revisions for each element below: *RHA’s Admissions and Continued Occupancy Policy* and the *Administrative Plan* are currently in the annual review process. These policies govern eligibility, selection criteria, program admissions and more. All revisions are anticipated to be effective by January 1, 2022. Executive summaries of changes to both programs will be included with the Annual PHA Plan submission as attachments.

(c) The PHA must submit its Deconcentration Policy for Field Office Review. **N/A** – RHA only has one property that is subject to the Deconcentration Rule. No comparison can be made.

See Attachment 1 for a more detailed report on revisions of existing PHA Plan elements.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Conversion of Public Housing to Tenant Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Project Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

	<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>See Attachment 1 for a more detailed report on new activities.</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 as units become vacant. Currently, RHA’s Housing Choice Voucher program is fully leased and utilized. RHA continues to pursue non-federal sources for funding affordable housing. All agency initiatives are evaluated to determine their effectiveness and to determine whether the program should be expanded, maintained or eliminated.</p> <p>See Attachment 1 for a more detailed progress report.</p>
<p>B.4.</p>	<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 1 for a more detailed report on capital improvements.</p>
<p>B.5</p>	<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: N/A</p>
<p>C. Other Document and/or Certification Requirements.</p>	
<p>C.1</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan? RHA will present the proposed Annual PHA Plan to the RAB to receive comments and feedback.</p> <p>Y N <input 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>C.2</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <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>
<p>C.3</p>	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4 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.

(a) Did the public challenge any elements of the Plan?
 Y N

If yes, include Challenged Elements.

Challenged elements will be determined based on feedback received during public comment period.

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing.

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

RHA Goal: Deconcentrate voucher holder units and foster affordable housing opportunities in higher opportunity areas.

Action: Continue providing mobility counseling for all voucher recipients in order to encourage voucher holders to look for units outside of areas of high poverty or minority concentration.

Action: Continue to seek landlord participation in the voucher program from property owners with affordable rental units in higher opportunity areas.

Action: Collaborate with the Housing Authority of Wake County to establish a Landlord Risk Mitigation Fund to encourage landlord participation in the voucher program.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

RHA Goal: Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.

Action: Annually, update the Language Access Plan and data with current information to reflect current demographic trends among persons with limited English proficiency.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

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

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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\(4\)\(e\)](#))

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

B. Plan Elements.

B.1 Revision of Existing 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 and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

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

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. 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\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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.

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

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 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 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 Resident Advisory Board (RAB) comments.** If the RAB had comments on 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.2 Certification by State of 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). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- C.3 Civil Rights Certification/ 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 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, 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.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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 7.02 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.

Annual PHA Plan Attachment 1

B.1 Revision of Existing PHA Plan Elements

Statement of Housing Needs

In order to help identify local housing needs, the Raleigh Housing Authority utilizes information available to the Agency, including that provided by the Consolidated Plan, information provided by HUD, and the regional Analysis of Impediments to Fair Housing. The items and goals below have been identified using the data available.

According to the current Consolidated Plan for the City of Raleigh, the primary housing barriers for Raleigh's low- and moderate-income residents are:

- Finding rental housing that is affordable, whether subsidized or naturally occurring.
- Severe rental cost-burdens for very-low (50% AMI) and extremely-low (30% AMI) income households.
- Once affordable areas being redeveloped into higher income neighborhoods, market rate or luxury apartments.
- The City's lack of authority to require a set aside for affordable housing in new developments impedes the supply of affordable rental units.

The 2020 regional Analysis of Impediments to Fair Housing makes a number of recommendations. The following is a summary of applicable goals identified for the region and for RHA:

- Continue providing mobility counseling, deconcentrate HCV holder units and foster affordable housing opportunities in higher opportunity areas.
- Ensure that persons with limited English proficiency can access the services and programs offered by the RHA.
- Remove barriers to accessing community assets for members of the protected classes.
- Advocate for public transit systems to connect lower income neighborhoods with major employment centers.
- Increase fair housing education, outreach and enforcement.
- Collaborate with the HACW to establish a Landlord Risk Mitigation Fund to encourage landlord participation in the HCV program.

Strategy for Addressing Housing Needs

In order to help address the current housing needs of low- to moderate-income renters in Raleigh, RHA will utilize some or all of the strategies below:

- Utilize whatever tools are available to increase housing choice under the voucher program.
- Assist with expanding opportunities into higher opportunity areas without steering for families using vouchers. RHA provides tools to assist with this including a computer with internet access and staff to assist when necessary.
- Remain committed to protecting and increasing the affordable housing within the City of Raleigh. This may include purchases, redevelopment, demolition and possibly disposition.
- The development of affordable housing should be directed to high opportunity areas, when possible.
- Continue to review policies and procedures that assist families with limited English proficiency.

- Advertise programs and services in areas with higher concentrations of English-limited families and individuals.
- Advertise jobs and hire multi-lingual staff members.
- Continue partnering with agencies, individuals and businesses to develop strategic goals and solutions to the affordable housing shortage in Raleigh.
- Continue to be a part of the Wake County Affordable Housing Committee formed by Wake County Commissioners.
- Continue to be a member of the Wake/Raleigh Partnership to End Homelessness which 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.
- Continue offering local preferences to applicants including those referred through the Continuum of Care's Coordinated Access System.
- Advocate for transportation services that provide better access to low-income families.
- Increase stakeholder awareness of fair housing and ensure they are taking steps to meet their legal obligation to affirmatively further fair housing.
- Assist with fair housing training and opportunities for non-governmental entities such as mom and pop landlords, churches, HOAs, and other groups that are not familiar with fair housing laws.

Deconcentration Efforts

- RHA properties with fewer than 100 units or designated as elderly are not subject to the Deconcentration Rule.
- 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 continues to offer the Incentive Public Housing program and working preferences.
- RHA creates income diversity within our re-developed public housing communities and scattered site housing.
- RHA encourages families receiving vouchers to consider residing in neighborhoods that provide access to greater opportunities for family members.

Homeownership Program

- RHA will consider implementing a Homeownership Program for RHA residents.
- A homeownership program may allow residents to work towards higher levels of self-sufficiency and economic stability.
- RHA may apply for admittance into the HUD Homeownership Program if directed to by its Board of Commissioners.

Safety and Crime Prevention under the Violence Against Women's Act

- RHA will continue complying with all requirements associated with the federal law, Violence Against Women Act (VAWA).

- RHA adheres to this law in the development of policy and procedures, including the *Admissions and Continued Occupancy Policy* and the *Administrative Plan*.
- Anyone eligible for public housing or for Section 8 will not be refused admittance or terminated from the program solely because they are a victim of domestic violence, dating violence, sexual assault or stalking.
- RHA posts copies of resident and applicant rights in all Offices and on the Agency website.
- Notification of applicants and residents rights are 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.
- An *Emergency Transfer policy* is in place for residents seeking transfers due to domestic violence, dating violence, sexual assault and stalking. This policy is posted throughout Agency offices, is on the Agency website and will be provided upon request.
- RHA provides training on domestic violence and VAWA to staff on an annual basis.
- RHA recognizes that 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.

Significant Amendment/Modification

- Both the public housing *Admission and Occupancy* and the *Leased Housing Administrative Plan* have been reviewed and revised.
- Executive Summary for changes to the *Admissions and Continued Occupancy Policy* – Public Housing, and the *Administration Policy* – Housing Choice Voucher/Section 8 are included as attachments.
- 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 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.
- RHA conducts annual review and adjustment to the Flat Rent schedule as required.
- RHA conducts annual review and adjustments to the Utility Allowance schedule as required.

B.2 New Activities

Demolition and/or Disposition

- RHA is strategizing future plans for protecting and increasing affordable housing within the City of Raleigh. This approach may include purchases, redevelopment, demolition and possibly disposition. HUD approval will be sought as details are developed.
- RHA's Repositioning Committee will continue to help advise demolition and disposition activities during the 2022-2023 fiscal year.
- Heritage Park (NC002000012) is being considered for demolition and redevelopment. This community is currently comprised of 122 public housing units constructed in the 1970's. RHA has met with residents, the Board of Commissioners, an architecture firm, City of Raleigh officials, and the City Council.

- RHA may apply for demolition/disposition of Heritage Park under Section 18. Heritage Park contains six 1-bedroom, forty-six 2-bedroom, thirty-six 3-bedroom, fourteen 4-bedroom, and twenty 5-bedroom units.
- 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.
- 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.

Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD

- HUD continues to encourage housing authorities to convert public housing units under RAD to voucher-based funding. RHA successfully received a portfolio award to participate in the RAD program in early 2020.
- RHA is in the process of implementing project-based vouchers through a RAD portfolio conversion. Closing of the first portfolio award is scheduled to take place November 30, 2021.
- The first four communities to be converted will be Meadow Ridge, Terrace Park, Berkshire Village, and Valleybrook. Staff has held 37 resident meetings to date to discuss RAD conversion.
- Site specific information will be included with the PHA Plan as a separate attachment.

Project-Based Vouchers

- RHA is currently in process of implementing a project-based voucher program to enhance the number of affordable housing rental units developed within our city.
- The *Administrative Plan* is being updated to include a project-based voucher program.
- The *Administrative Plan* includes information on the program including acceptance and scoring PBV owner proposals, selection of PBV program participants, and more.
- RHA will be implementing a project-based voucher program which may utilize up to 20 percent of its authorized units for project-based assistance.
- RHA may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

Capital Grant Programs or Other Grant Programs

- RHA may apply 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 may apply for earmarked funds to help provide greater access for residents to educational and employment opportunities.
- RHA has been selected for the Building Futures Initiatives pilot program. The program provides direct technical assistance to help PHAs and their local workforce partners develop and implement pilot programs that aim to leverage the Section 3 training and employment opportunities generated by PHAs' ongoing rehabilitation, retrofit, and operations and maintenance activities to improve participating residents' employment outcomes, specifically in the construction and building performance sectors.

B.3 Progress Report on Items Continuing from Previous Annual and Five-Year PHA Plans

In working towards items previously identified as areas of needs/concentration, RHA:

- Continues to work with the community as a partner to agencies, individuals and businesses to develop goals and solutions to the affordable housing shortage in Raleigh.
- Remains committed to protecting and increasing affordable housing within Raleigh. This approach may include purchases, redevelopment, demolition and/or disposition.
- Still intends to use whatever tools are available to increase housing choice under the voucher program.
- Continues to strengthen its working relationship with non-profits and local educational institutions to help bolster resident's life skills, job training programs, and homeownership counseling.
- Continues to explore and consider the Moving to Work program to determine whether applying would be advantageous to RHA and its residents.
- Continues to apply for grants through HUD or other agencies.
- Continues 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.
- Promotes rent readiness guidelines to housing applicants while they are on the RHA 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.
- Offers waiting list preferences to structure the waiting lists. 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
 - Returning Residents
- Offers local preferences and special admissions to allow some applicants additional benefits outside of the regular waiting list procedures. The following are available to one or more waiting list:
 - Domestic Violence/VAWA
 - Coordinated Entry referrals
 - Olmstead Referrals
 - Support Circle Referrals
 - Displaced Families
 - Police Officers
 - Agencies with a Current Memorandum of Agreement
- Maintains a satisfactory vacancy rate while making necessary adjustments for modernization.
- Maintains operational standards as a distinguished high performing public housing agency.
- Secures 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 (currently approved through September 26, 2022).

- Collaborates with the Raleigh Police Department as needed within and around its communities.
- Continues to modernize its public housing units as needed and as funding allows.
- Maintains 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.
- 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).
- 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.
- Maintains the agency website with contact information, pertinent documents and emergency announcements which improve communication with residents, housing applicants, and Section 8 landlords.
- Continues to pursue increasing electronic and online applications including electronic reporting, virtual meetings and conferences, online rent payments and more.

B.4 Capital Improvements

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 needed including the addition of new cameras to Birchwood, Chavis Heights, Mayview, Glenwood Towers, and Stonecrest.
- Replacement of outdated plumbing in a 60 unit development as units are turned during vacancies.
- Abate asbestos portfolio wide during vacancy turns as needed.
- Installation of new luxury vinyl-plank flooring during vacancy turns.
- Glenwood Towers roof removal and replacement, façade replacement and exterior caulking and waterproofing.
- Parking lot pavement/resurfacing at Glenwood Towers, Saint Saviour's Center and Mayview.
- Carriage House lenti repair, façade replacement, and roof replacement.
- New fire alarm system installation at Carriage House is underway.
- Lead Based Paint testing at all pre-1978 multifamily developments as needed.
- Radon testing on first floor units at vacancy turn and mitigation system installation as needed.
- Heritage Park redevelopment vision is being developed and Capital Funds will be utilized during this process.