## Streamlined Annual PHA Plan (HCV Only PHAs)

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

OMB No. 2577-0226 Expires 02/29/2016

**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, 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.** Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA <u>do not</u> need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

#### 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 <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 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 exceeds 550, and that was designated as a standard performer in the most recent PHAS and 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	PHA Name:							
	Participating PHAs  Lead HA:	PHA Code	g a joint Plan and complete table be Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program			

В.	Annual Plan.					
B.1	Revision of PHA Plan Elements.  (a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?  Y N					
	Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Operation and Management. Informal Review and Hearing Procedures. Homeownership Programs. Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements. Substantial Deviation. Significant Amendment/Modification.					
	(b) If the PHA answered yes for any element, describe the revisions for each element(s):					
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 Project Based Vouchers.					
	(b) If this activity is planned for the current Fiscal Year, describe the activities. Provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.					
B.3	Most Recent Fiscal Year Audit.  (a) Were there any findings in the most recent FY Audit?  Y N N/A  □ ☑ □  (b) If yes, please describe:					
B.4	Civil Rights Certification Form HUD-50077 PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.					
B.5	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.					
B.6	Progress Report.  Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.					
B.7	Resident Advisory Board (RAB) Comments.					
	(a) Did the RAB(s) provide comments to the PHA Plan?  Y N					
	<ul> <li>(a) 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.</li> </ul>					

### Attachment 1 Section B.1 Revision of PHA Plan Elements

### Deconcentration and Other Policies that Govern Eligibility, Selection and Admission

Virginia Housing (VHDA) plans to implement use a lottery system to select individuals for the waiting list. When a waiting list is opened, the system will pick a random assortment of all applicants who applied during the opening period to be added to the waiting list. Local agency preferences will be applied to those who are successful during the lottery and sorted on the waiting list based on their preferences. The lottery system approach is increasingly viewed as a best practice which helps to promote access to all households (including elderly and disabled residents) while the waiting list is open.

#### **Financial Resources**

Calendar Year (CY) 2021 based on CY 2020 funding: HAP \$75,872,361 + Admin \$6,086,665 = Total \$81,959,026

#### **Rent Determination**

VHDA plans to modify the subsidy standards to allow 1 bedroom for the head of household and 1 bedroom for each person of the opposite sex (other than spouses and children under age 5). While the proposed change to the subsidy standards may enable eligible families to access higher payment standards, it enhances choice for the households in determining the living configuration most appropriate for the circumstance.

An important feature of the HCV Program is the ability to adjust a household's rental payment in response to a reported decrease in income. This provision has been very important during the economic uncertainty generated by the COVID-19 pandemic. Conversely, VHDA plans to implement a comparable interim reporting policy for increases in income. The proposed change would require families to report all increases in income within 10 days of the change and would require an interim recertification to be processed if the changes were greater than \$200 per month or \$2400 per year unless the change is expected to last less than 30 calendar days.

Furthermore, VHDA plans to require zero income families to re-certify their zero income status every 60 days. HUD guidance encourages PHA to evaluate zero income status frequently to limit occurrences of unreported income.

### **Operation and Management**

VHDA has drafted a new Administrative Plan with a format that is reflective of industry standards and best practices. Accordingly, the new plan utilizes the Nan McKay Administrative Plan model which provides a user-friendly format for both staff and other interested entities.

### Attachment 2 Section B.6 Progress Report

Progress Report on Meeting Goals and Objectives:

Goal 1: Increase affordable housing opportunities for low, very low-, and extremely low-income families

 VHDA has received additional vouchers through the VASH and Mainstream programs.

Goal 2: Ensure an ongoing inventory of decent, safe, and affordable housing that supports strong, viable communities

- VHDA achieved a high performing score in SEMAP in FY 2020.
- VHDA continues to conduct Housing Quality Standards inspections annually.
- VHDA continues to conduct outreach to landlords and encourage them to utilize the virginiahousingsearch.com website to list units available for rent.

Goal 3: Strengthen VHDA's ability to provide affordable housing

 VHDA continues to standardize and automate forms and look for ways to cut administrative program costs.

Goal 4: Increase assisted housing choices

 VHDA continues to provide voucher assistance under the DOJ Olmstead Settlement Agreement allocating 127 vouchers to those with developmental disabilities

### **Attachment 3 Section B.7 Resident Advisory Board Comments**

VHDA created the Resident Advisory Board (RAB) in accordance with HUD requirements in order to provide a forum for sharing information about the PHA plan. The RAB currently consists of three members: Amy Venezian representing the Nelson County Community Development Foundation, Rachel Chirino representing the Central Virginia Resource Corporation and Deidre Harris representing the Central Virginia Resource Corporation.

During the consultation process for preparing this plan, VHDA convened two meetings of the RAB. The first meeting was conducted via conference call on April 3, 2020 during the first weeks of the COVID-19 pandemic. During this first meeting, staff provided an overview of proposed key changes and modifications to the PHA plan. The RAB overall expressed concern about any changes to the plan given the uncertainty of the COVID environment. Nevertheless, the RAB did acknowledge the value of several of the proposed changes as reflected later in the meeting comment summary portion of this section.

Given the feedback provided by the RAB to staff during the initial meeting, it was determined that further consultation would be beneficial prior to submission of the annual plan. Accordingly, VHDA convened the second RAB meeting via WebEx on July 30, 2020. During the intervening period, VHDA successfully transitioned the program to a largely remote work platform while continuing to address programmatic requirements including the opening of several waiting lists.

The second RAB meeting provided a timely opportunity to address key points expressed during the first RAB meeting while sharing information about key developments related to rental assistance and changes to the Virginia Fair Housing Law. Virginia now has source of income protections in the Commonwealth's Fair Housing Law which has positive implications for voucher households seeking available rental units.

During the meeting, staff focused on key themes prompting the proposed changes to the plan:

- HUD Guidance
- Best Practices
- Accessibility
- Household Choice

Staff discussed three issues of particular interest to the RAB from the first meeting: proposed changes to the waiting list, subsidy standard and interim reporting requirements policies. The discussion of the subsidy standard policy also included a review of cost implications to the program which were determined to be modest in view of the benefit to households. In summary, the RAB members participating in the meeting found the proposals to be appropriate and acceptable given the stated goal of

the voucher program. The feedback that was shared by the RAB members in attendance was very positive and supportive upon receiving clarification on the policy changes. The RAB members expressed their appreciation to the staff for involving them in the policy decisions and for being supportive of the households assisted by the voucher program.

### **Meeting Comment Summaries**

July 30, 2020 - The most recent of the two RAB meetings was conducted via WebEx on July 30, 2020. The meeting was facilitated by Diana Crosswhite, HCV Policy & Training Manager and included Mike Hawkins, Managing Director of Community Outreach; Anton Shaw, HCV Program Director; Patrice Freeman, HCV Program Compliance Manager; and Sid Mohammad, HCV Program Accounting Manager. RAB members present were Amy Venezian representing the Nelson County Community Development Foundation, Rachel Chirino representing the Central Virginia Resource Corporation. Deidre Harris representing the Central Virginia Resource Corporation did not attend the meeting but submitted written comments following the meeting which are reflected at the conclusion of this summary. Mr. Shaw reviewed the proposed changes to the waiting list, subsidy standard and interim reporting requirements policies to address concerns expressed during the initial RAB meeting. Information was provided regarding the ADA requirements for wait list application, the benefit of a parent and a child, or two teenage siblings of the opposite sex having separate bedrooms, and the minimal financial impact of the subsidy change on the program. Overall, the RAB members present at the meeting provided feedback that acknowledged the benefit the proposed changes and their acceptance of the changes after clarification was provided by staff. Post meeting questions and comments provided in writing by RAB members: Concerning the waiting list, Ms. Venezian wanted to know how applicants would be notified of their selection for the waiting list and in follow-up written comments indicated that she was concerned that elderly and disabled individuals would be subject to the lottery and not guaranteed a waiting list position. Ms. Harris' written comments indicated that she felt the waiting list should be on a first come first-served basis with special consideration given to elderly and disabled individuals. Concerning subsidy standards, Ms. Harris' written comments indicated that the policy should remain unchanged and be revisited at a later date. Concerning interim reporting requirements, Ms. Harris' written comments indicated a preference for 15 days to report a change.

<u>April 3, 2020</u> - The meeting was conducted by Diana Crosswhite, HCV Policy & Training Manager. Ms. Crosswhite reviewed each proposed policy change with the RAB by describing the current policy, proposed policy and how each policy change could impact the Housing Choice Voucher Program. Overall, the Resident Advisory Board (RAB) members felt that VHDA should not implement new policies at this time during this time of uncertainty (COVID-19). The preference was to keep the program unchanged so that families and the local housing agencies were not overburdened. Specific comments include:

<u>Waiting List:</u> Ms. Harris stated that she favors first come first serve and felt that a lottery system would give individuals applying for the program a false sense of hope. She likes knowing that when she applies she would have a chance at a voucher. Ms. Chirino and Ms. Venezian agreed that they anticipate the need for vouchers to increase in the coming months and if they were applying to the program they would like to be assured that they would get on the list. Overall summary: RAB does not support the change to a lottery system at this time.

<u>Subsidy Standards:</u> Generally, all Resident Advisory Board members support the change in this policy but only if the financial impacts were considered first. Ms. Chirino stated that she does not support this change if it would mean the HCV Program would increase program costs and cause VHDA to have to stop issuing vouchers to families on the waiting lists. Overall summary: RAB does not support the change in subsidy standards at this time and encourages VHDA to study the program costs associated with a change like this if it were to be considered in the future.

Reporting Interim Increases in Income: Ms. Harris stated that given the current environment she does not support a change in the interim reporting policy and feels that this change will create more hardship and stress for families. The other RAB members agreed with the statement. Overall summary: RAB does not support any changes to the interim reporting policy.

<u>Retaining SSN Documentation:</u> Ms. Harris stated that she favors the agent writing the number down and then giving the card back to the family. She said this is the procedure that she practices with the Henrico County school system. Overall summary: RAB feels that VHDA can manage this as they deem appropriate.

<u>Zero Income Families:</u> Ms. Harris stated and the others agreed that she felt it was beneficial to change this policy. Overall summary: RAB agrees with requiring families to re-certify their zero-income status every sixty days.

<u>24-Hour HQS Fail Items:</u> Ms. Harris suggested that the requirement for any tenant provide utilities be given longer than 24 hours to correct the situation but supported landlords being required to correct the deficiency within 24 hours for any landlord provided utilities. Overall summary: RAB agrees with the list of 24-hour failed items except in the case of tenant provided utilities.

#### VIRGINIA HOUSING DEVELOPMENT AUTHORITY

### RESOLUTION APPROVING THE PHA ANNUAL PLAN FOR THE VIRGINIA HOUSING DEVELOPMENT AUTHORITY FOR THE HOUSING CHOICE VOUCHER PROGRAM

### **AUGUST 25, 2020**

WHEREAS, pursuant to 24 CFR Part 903, the Virginia Housing Development Authority (the "Authority") is required to adopt an annual plan for its administration of the Housing Choice Voucher Program; and

WHEREAS, the Board of Commissioners of the Authority now desires to adopt the PHA Annual Pan in the form attached hereto.

NOW THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Authority that the PHA Annual Plan is hereby approved in the forms attached hereto.

BE IT FURTHER RESOLVED that the Chairman is authorized to execute the PHA Certifications of Compliance with the PHA Plan and Related Regulations substantially in the form attached hereto.

BE IT FURTHER RESOLVED that the Chairman, the Chief Executive Officer, and the Director of the Housing Choice Voucher Program are each authorized to take any and all action which he or she may deem necessary or appropriate in order to implement the PHA Plan and to carry out the intent of this Resolution.

# 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  $\frac{\times}{2}$  5-Year and/or  $\frac{\times}{2}$  Annual PHA Plan for the PHA fiscal year beginning 7/2020 \_, 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).

Virginia Housing	VA901			
PHA Name	PHA Number/HA Code			
X Annual PHA Plan for Fiscal Year 2021				
5-Year PHA Plan for Fiscal Years 20 20				
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n				
hereby certify that all the information stated herein, as well as any information prorosecute false claims and statements. Conviction may result in criminal and/or civ	ovided in the accompaniment herewith, is true and accurate. Warning: HUD will penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).			
Name of Authorized Official  Mr. Shekar Narasimhan	Title Chair, Board of Commissioners Virginia Housing (VHDA)			
Signature Alexanich	Date August 25, 2020			
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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

·	Johnston icial's Name	_, the	Director  Official's Title			
certify that the 5-Year PHA Plan and/or Annual PHA Plan of the  Virginia Housing						
PHA Name						
is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of						
Impediments (AI) to	o Fair Housing Choice of	f the				
Commonwealth of Virginia						
		Local Jurisdie	ction Name			
pursuant to 24 CFR	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.  Both the PHA Plan and Consolidated Plan (FYs 2018-2023) have as their main goals to expand the supply of affordable housing and address the needs of the special needs population and both agencies commit to using their respective agency resources to address these goals. The Analysis of Impediments to Fair Housing (2018) lists the availability of affordable, quality housing as an impediment. The PHA Plan addresses this impediment in it's goals by working to ensure an ongoing inventory of decent, safe and affordable housing.						
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. <b>Warning:</b> 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			
Mr. Erik Johnston			Director, Department of Housing and Community Development			
Signature			Date			
Eile ( ) Shriter			August 25, 2020			