



Housing Authority of the City of Wilmington, North Carolina

FY 2023 Annual Plan (Amended)

Approved by WHA Board of Commissioners 12/06/2022

Amended by WHA Board of Commissioners __/__/__

Annual Plan- 50075-ST

Attachments

Attachment 1 – Statement of Financial Resources

Attachment 2 – New Activities (Section B.2)

Attachment 3 – AFFH continued (Section D.1)

Attachment 4 – Potential RAD Conversions

Attachment 5 – Public Notice

Attachment 6 – Capital Fund Program (CFP) Annual Statements

Attachment 7 – Civil Rights Certification

Attachment 8 – Certification by City Official

Attachment 9 – RAB Meeting Comments

Attachment 10 – Public Meeting Comments

Annual PHA Plan <i>(Standard PHAs and Troubled 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-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments 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, 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: Housing Authority of the City of Wilmington, North Carolina PHA Code: NC001 PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA (SEMAP) PHA Plan for Fiscal Year Beginning: (MM/YYYY): 04/2023 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1,036</u> Number of Housing Choice Vouchers (HCVs) <u>2,083</u> Total Combined Units/Vouchers <u>3,119</u> PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input checked="" type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. 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. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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B.	Plan Elements
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B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Asset Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Revised WHA’s financial resources for the latest fiscal year; see Attachment #1.</p> <p>(c) The PHA must submit its De-concentration Policy for Field Office review.</p> <p>It is the WILMINGTON Housing Authority's policy to provide for De-Concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we may skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.</p> <p>The WILMINGTON Housing Authority will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.</p> <p>Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and De-Concentration incentives to implement.</p> <p>The WILMINGTON Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the De-Concentration goals of a particular development.</p> <p>Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.</p>
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B.2	<p>New Activities.</p> <p>(b) 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 checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</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 Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input 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</p>
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	<p>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> <ul style="list-style-type: none"> • WHA will pursue a RAD conversion for Solomon Towers. The conversion will use HCV PBVs; • WHA is currently engaged with a private developer to complete a Section 18 Demo/Disposition/Redevelopment for Hillcrest and Hillcrest Annex; • Jervay Communities is undergoing a RAD conversion with a private developer partner.
<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 and Annual Plan.</p> <p>The Housing Authority of Wilmington, NC had last submitted our most recent 5-year plan in January of 2020, and our most recent Annual Plan in December of 2021. This updated progress report is as follows:</p> <p>Increase occupancy rates at all Public Housing sites</p> <ul style="list-style-type: none"> • WHA has worked continuously since the last annual report to increase occupancy rates across all our public housing sites, with significant increases in occupancy rates at all properties occurring since the last report. <p>Improve REAC, PHAS, SEMAP and PIC scores</p> <ul style="list-style-type: none"> • WHA continues to improve procedures, processes, systems and training, in order to improve these scores. WHA anticipates our next scores will be significant improvements over past scores. <p>Improve, take actions to address audit findings</p> <ul style="list-style-type: none"> • WHA is implementing all recommendations provided from the most recent Audit Report. <p>Seek additional grant funding for resident services, FSS, security, new construction and rehabilitation of Public Housing units</p> <ul style="list-style-type: none"> • WHA has created a Community Engagement & Enhancement Department and the position of VP, Housing and Resident Services. Among their responsibilities are fundraising, social venture creation and resident relations, identifying grant opportunities and other partnerships to strengthen and add services to WHA’s public housing communities. In the past year, the VP, Housing and Resident Services has secured four national awards and two new grants, including Jobs Plus which will serve the Houston Moore and Creekwood communities. • WHA has secured funding from three (3) non-federal sources to assist with the rehabilitation of public housing units impacted by mold. WHA has received mold remediation funding commitments of \$1.5 million from the City of Wilmington, \$1.5 million from New Hanover County, and \$2 million from the State of North Carolina Office of Recovery and Resiliency. <p>Maximize of public housing units up to Faircloth Limits</p> <ul style="list-style-type: none"> • WHA continues to explore opportunities to increase available units up to the Faircloth limits. <p>Explore Leverage opportunities for both Capital Fund, RHF, and for Project Based Vouchers for further development and rehabilitation of public housing</p> <ul style="list-style-type: none"> • WHA continues to explore opportunities for funding to further develop and rehab our units. Currently, Capital funds are being used to address specific unit conditions, improve sites, address structural as well as environmental issues affecting the communities. Project-Based Vouchers are being utilized at our Rankin Terrace site, and will support planned RAD conversions at Hillcrest, Jervay, and Solomon Towers. <p>Modernize Public Housing Units</p> <ul style="list-style-type: none"> • WHA continues to look for funding along with our Capital Funds to modernize our units beyond what we have accomplished at our public housing sites in the past. In July of 2022, WHA applied for \$3 million from HUD’s Capital Fund At Risk/Receivership/ Substandard/ Troubled Program to support the rehabilitation and modernization of public housing units. <p>Streamline and Enhance Effectiveness of Operations</p> <ul style="list-style-type: none"> • An effort is underway from new executive management at WHA to streamline and enhance the effectiveness of PHA operations, including better turn-around time for units as well as Procurement and Payments. WHA has implemented YARDI-Voyageur SaaS Housing Authority software to further enhance operations. Training on this system for all WHA employees is scheduled for completion in FY 2022. <p>Maximize full Utilization of Housing Choice Vouchers</p> <ul style="list-style-type: none"> • WHA continues its efforts to recruit and retain landlords into the program, and regularly adds 1-2 landlords per month. <p>Strengthening relationships with Community Partners for Resident services.</p> <ul style="list-style-type: none"> • WHA FSS Coordinator and ROSS Coordinators continue to strengthen and build relationships with community partners. During the pandemic, partnerships for virtual learning have been paramount to our student’s success. WHA has partnered with an organization to provide a virtual after school programming to keep middle school youth engaged during the pandemic. • WHA has applied for and received a grant of \$13,000 from Walmart Community Grant to pay for the distribution of essentials to displaced families. • WHA, in coordination with Feast Down East and several local partners, has been able to provide access to fresh and healthy food for low-income families and seniors. Children have access to free summer lunches through New Hanover County Schools. • WHA continues to partner with the Brigade Boys & Girls Club to provide a nationally recognized after-school program for the youths at Houston Moore.

	<ul style="list-style-type: none"> • Enhance quality of resident service programming and self-sufficiency opportunities • WHA Community & Engagement staff will continue to work with local partners to provide access to personal and economic self-sufficiency resources. Staff will also work to increase community engagement by providing necessary services in each community. • WHA was awarded a Resident Opportunity and Self Sufficiency (ROSS) grant for \$245,850.00 • The Elderly Service Coordinator position was funded \$83,126.0 to provide services to the senior population at Glover Plaza. • Two Family Self Sufficiency positions were funded for \$145,000 to assist public housing and housing choice voucher, residents. • WHA received a JobsPlus Grant in the amount of 2.3 million. As required by the grant guidelines, applicants must demonstrate at least a 25% match in in-kind services by local partners. WHA exceeded this amount, showing \$1.2 million in in-kind support, a 52% match. Residents will have access to resources that will assist them with attaining their educational and employment goals in an on-site Jobs Plus program center. The program will bring comprehensive education, employment programming, and wrap-around services. Stakeholders will include community resource partners that hold best practices in the area of education and employment, such as Cape Fear Community College and StepUp Wilmington. Other community partners include District C, Coastal Horizons, Smart Start of New Hanover County, Feast Down East, Cape Fear Literacy Council, Brigade Boys & Girls Club, and PNC Bank. • Through the Jobs Plus, Program residents will be able to access incentives and subsidies designed to keep their earnings in their bank accounts, as they move towards self-sufficiency. These will include transportation cost coverage and child care stipends. WHA will conduct four (4) Jobs Plus Skills Academies per year in the area of Customer Service, Healthcare, Business Services, and Construction. Each Academy offers an industry-specific nationally recognized certification. Many of the Jobs Plus program participants will find themselves working in the same community they reside, building an enhanced sense of investment and pride in their community as stakeholders. <p>Plans for new construction will include green building strategies to the extent possible</p> <ul style="list-style-type: none"> • For any new construction planned, WHA looks to include green building strategies and energy efficiency to the extent possible and also looks that the strategies make fiscal sense for the project in terms of both costs and reward <p>Expand agency presence to include affordable housing throughout the jurisdiction of Wilmington and New Hanover County</p> <ul style="list-style-type: none"> • WHA is currently looking for properties to purchase located within and just outside the City of Wilmington and into New Hanover County.
<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>Capital Fund Action Plan approved in EPIC June 3, 2022.</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 checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe: WHA's most recently completed audit was issued on October 29, 2021. The audit includes a list of findings, questioned costs, and recommended corrective actions. WHA is in the process of, or has completed, all recommended corrective actions.</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?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>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>	
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-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	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>	
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>WHA is “Troubled” only under its SEMAP score. There are no MOA, PIP, or Recovery Plans in place.</p>	
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>	
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to 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.</p> <table border="1" style="width: 100%;"> <tr> <td> <p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>Collaborate with local agencies to apply for FHAP or FHIP to establish a local Fair Housing Initiative to monitor fair housing issues and complaints, and provide funding to assist with FHIP application. Hold at least one fair housing workshop for landlords and real estate professionals annually.</p> </td> </tr> </table>	<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>Collaborate with local agencies to apply for FHAP or FHIP to establish a local Fair Housing Initiative to monitor fair housing issues and complaints, and provide funding to assist with FHIP application. Hold at least one fair housing workshop for landlords and real estate professionals annually.</p>
<p>Fair Housing Goal:</p> <p><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p>Collaborate with local agencies to apply for FHAP or FHIP to establish a local Fair Housing Initiative to monitor fair housing issues and complaints, and provide funding to assist with FHIP application. Hold at least one fair housing workshop for landlords and real estate professionals annually.</p>		

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Conduct at least one workshop annually on fair housing for landlords, lenders, and housing managers to review housing for persons with disabilities and reasonable accommodation requests; create working group of City/WHA staff, disability services providers, landlords, and advocates to discuss responses to recent cases of discrimination.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Present recommendations to Wilmington City Council and New Hanover County Commission for action on recommended immediate, short-term and long-term strategies to increase affordable housing and reduce housing cost burdens.

(continued, see Attachment 3)

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled 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. All PHAs must complete this section.

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.” ([24 CFR §903.7](#))

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. 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)) 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 maintain 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))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) 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))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

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 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 or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods 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 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/hopec6/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))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

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 Rental 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.](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7.](#) (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03.](#) (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. 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 (24 CFR §903.7(b)).

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).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

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.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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 in part 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.

Public reporting burden for this information collection is estimated to average 7.52 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.

Attachment #1

Statement of Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2023 grants)		
a) Public Housing Operating Fund	\$ 5,402,000	
b) Public Housing Capital Fund	\$ 2,484,997	
c)		
d)		
e) Annual Contributions for HCV: Tenant-Based Assistance Administrative Fees Earned	\$ 12,974,208 \$ 946,000	
f) Multi-Family Service Coordinator Grant	\$ 88,000	1 Service Coordinator
g) Resident Opportunity and Self-Sufficiency Grants: FSS Coordinator Grant	\$ 245,850	Service Coordinator
h) Community Development Block Grant	\$	
i) SNAPS	\$ 181,000	Housing Assistance for people with mental health and homelessness
j) HCV/PH FSS Coordinator Grant	\$ 145,000	2 FSS Counselors
k) Jobs Plus Grant	\$ 2,300,000	New Jobs Plus Award
Other Federal Grants (list below)		
l) HOPWA	\$ 25,000	Housing Assistance for people with HIV/Aids
m) Mainstream 5	\$ 201,603	Mainstream 5 Program
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income	\$ 1,980,000	PIH Operations



Attachment 2 - New Activities (Section B.2)

- Mixed Finance Modernization or Development
 - ✓ WHA has selected a developer partner and is preparing an application for RAD Conversion/Section 18 Blend Demo-Dispo of Hillcrest (216) and Hillcrest Annex (40 units).
 - ✓ WHA has initiated an application for a RAD Conversion of Solomon Towers (151 units).
 - ✓ WHA has initiated an application for Section 18 Demo-Dispo of Houston Moore (150 units).
 - ✓ WHA is always looking for ways to modernize our housing or develop additional affordable housing. WHA plans to submit a Tax Credit Application for either Modernization or Development which may include Mixed Finance. The Tax Credit application could affect 1 or more of our sites, listed below.

- Demolition and/or Disposition
 - ✓ Properties that may be considered for disposition or demolition include, but are not limited to:
 - Hillcrest (216 units)
 - Hillcrest Annex (40 units)
 - Houston Moore (150 units)
 - Solomon Towers (151 units)
 - Creekwood South (60 units)
 - Creekwood South LLC (138 units)
 - Woodbridge (24 units)
 - Eastbrook (32 units)
 - Vesta Village (43 units)
 - New Brooklyn (40 units)
 - Scattered Sites (7 units)
 - SouthSide 1 (1 unit)
 - Dawson Lofts
 - Jervay (71 units)

- Demolition and/or Disposition, RAD Conversion/Section 18 Blend Application Hillcrest and Hillcrest Annex

Project Narrative:

During 2023, the Housing Authority of The City of Wilmington NC, (WHA), through its subsidiary Housing and Economic Opportunities, Inc. (HEO), intends to submit and gain approval from HUD for a RAD Conversion/Section 18 Blend Demolition Disposal Plan for Hillcrest (AMP005), and Hillcrest Annex (AMP082). With this approval, WHA/HEO will undertake the

steps necessary to redevelop the Hillcrest/Annex property, +/- 25 acres, from the current state of the property to a newly constructed mixed-income, mixed-use community with modern, pedestrian and environmentally friendly architecture that will be a model for others.

Hillcrest was originally constructed in 1943 as temporary housing to support WWII needs for military housing, the Hillcrest Annex was added in 1967. While usable and occupied since the original occupancy date, the buildings and units are past the normal service life intended for the property. The Physical Needs Assessment completed in 2017 (being updated 03/2023) estimated renovation costs at \$104,500 per unit, qualifying Hillcrest/Annex against the Total Development Cost (TDC) threshold required for Section 18 approval and providing the direction for the demolition and complete redevelopment of the property.

The Hillcrest/Hillcrest Annex Re-Development Project includes these key steps:

- 1) Physical Needs Assessment (PNA) to support Section 18 obsolescence test;
- 2) WHA prepares and distributes RAD Resident Information Notice (RIN) and holds first and second resident meeting;
- 3) RAD Conversion application is submitted through the RAD Resource Desk (online);
- 4) HUD issues initial approval through a Commitment to enter into a Housing Assistance Payment (CHAP);
- 5) WHA processes substantial amendment to its Annual Plan (if necessary);
- 6) WHA prepares and submits a financing plan to HUD;
- 7) HUD approves financing plan and issues a RAD conversion commitment; and,
- 8) WHA closes on RAD conversion and financing;
- 9) Section 18 Demo/Disposal Application including HUD forms 52860, 52860A, 52860B, 5837;
- 10) Total Development Cost (TDC) analysis as required to support the Application;
- 11) A complete and HUD approved Resident Relocation Plan;
- 12) HUD required and compliant Resident Notification Process, Resident Advisory Board consultations, Hillcrest Resident consultations, Hillcrest Resident Organization consultations, and Public Notice and Hearings;
- 13) Completion and submittal of the HUD required compliant Environmental Assessment (part 50) HUD Form 53245;
- 14) Submittal and HUD approval of the required Significant Amendment to the WHA/HEO 2023 Annual Plan;
- 15) Via a HUD procurement compliant RFQ process, WHA to evaluate and select private Development Partner;
Development Partner(s) to assist WHA/HEO in the redevelopment of the Hillcrest/Annex property and the design, engineering, architecture, all aspects of constructing the new mixed-use, mixed-income community on the previous Hillcrest/Annex site;
- 16) WHA/HEO in concert with the selected Development Partner(s), and in close collaboration with local government develop and implement the Hillcrest/Annex Redevelopment Plan Project;
- 17) WHA/HEO to deliver to the City of Wilmington community a newly constructed, modern, architecturally and environmentally friendly mixed-income, mixed-use community that will be a model for others;
- 18) All material and architectural barriers that restrict the mobility and accessibility to elderly and

handicapped persons currently at Hillcrest/Annex will be removed and replaced with architectural features that enable proper access for elderly and persons with disability and comply with Federal, State and local accessibility requirements;

19) Timetable for the Hillcrest/Annex Re-Development Plan Project start to completion is 2023 to 2028.

- RAD Conversion Application for Solomon Towers Project Narrative:

The Solomon Towers RAD Conversion project includes these key steps:

- 1) WHA distributes Resident Information Notice (RIN) and hold first and second resident meeting;
- 2) A Property Needs Assessment (PNA) is conducted to determine required rehabilitation;
- 3) WHA applies to HUD for RAD project through RAD Resource Desk (online);
- 4) HUD issues initial approval through a Commitment to enter into a Housing Assistance Payment (CHAP);
- 5) WHA processes substantial amendment to its Annual Plan (if necessary);
- 6) WHA prepares and submits a financing plan to HUD;
- 7) HUD approves financing plan and issues a RAD conversion commitment; and,
- 8) WHA closes on RAD conversion and financing; and,
- 9) Property undergoes substantial rehabilitation to provide amenities and architectural features that enable proper access for elderly and persons with disability and comply with Federal, State and local accessibility requirements.

- Demolition and/or Disposition, Section 18 Application Houston Moore Project Narrative:

The Houston Moore Re-Development Project includes these key steps:

- 1) Section 18 Demo/Disposal Application including HUD forms 52860, 52860A, 52860B, 5837;
- 2) Total Development Cost (TDC) analysis as required to support the Application;
- 3) A complete and HUD approved Resident Relocation Plan;
- 4) HUD required and compliant Resident Notification Process, Resident Advisory Board consultations, Houston Moore Resident consultations, Houston Moore Resident Organization consultations, and Public Notice and Hearings;
- 5) Completion and submittal of the HUD required compliant Environmental Assessment (part 50); HUD Form 53245;
- 6) Submittal and HUD approval of any required Significant Amendment to the WHA/HEO 2023 Annual Plan
- 7) Via a HUD procurement compliant RFQ process, to evaluate and select private Development Partner(s) to assist WHA/HEO in the redevelopment of the Houston Moore property and the design, engineering, architecture, all aspects of constructing the new mixed-use, mixed-income community on the previous Houston Moore site;
- 8) WHA/HEO in concert with the selected Development Partner(s), and in close collaboration with local government develop and implement the Houston Moore Redevelopment Plan Project;
- 9) WHA/HEO to deliver to the City of Wilmington community a newly constructed, modern,

architecturally and environmentally friendly mixed-income, mixed-use community that will be a model for others;

10) All material and architectural barriers that restrict the mobility and accessibility to elderly and handicapped persons currently at Houston Moore will be removed and replaced with architectural features that enable proper access for elderly and persons with disability and comply with Federal, State and local accessibility requirements;

11) Timetable for the Houston Moore Re-Development Plan Project start to completion is 2023 to 2029.

- HCV Program Landlord Education and Outreach
 - ✓ WHA will initiate an education and outreach program targeted to area landlords and/or affordable housing providers, with the goal of retaining and increasing the number of properties actively participating in the program.
 - ✓ Education and outreach activities may include newsletters, presentations, briefing to community groups, one-on-one appointments, or other ways of sharing information or creating relationships between WHA and area landlords.
- Designated Housing for Elderly and/or Disabled Families
 - ✓ WHA is currently is exploring opportunities for seniors and people with disabilities.
- Conversion of Public Housing to Tenant-Based Assistance
 - ✓ WHA will consider use of Tenant-Based Assistance for conversion from Public Housing per new HUD guidance (Permanent Tenant Protection Vouchers)
- Conversion of Public Housing to Project-Based Assistance under RAD
 - ✓ WHA Plans on completing an analysis of its current portfolio to see which AMPs would be best suited for a RAD conversion.
 - ✓ *Please see **Attachment 4** for properties being considered for RAD Conversions.*
- Occupancy by Over-Income Families
 - ✓ WHA is planning to update our ACOP plan this year which may include an update or revision to Occupancy Policies for Over-Income Families which may affect 1 or more of our properties listed above.
- Occupancy by Police Officers
 - ✓ WHA is planning to update our Administrative & ACOP plans this year which may include an update or revision to Occupancy Policies for Police Officers which may affect 1 or more of our properties listed above.
- Non-Smoking Policies
 - ✓ WHA has a non-smoking policy in place that is being enforced. However, updates to the ACOP may include changes to the smoking policy which will affect the properties above.
- Project-Based Vouchers

- ✓ If there was an opportunity to receive Project-Based Vouchers for an existing community or new construction, WHA is exploring pursuing additional Project-Based Vouchers and is open to opportunities that may affect 1 or more of our properties listed above.
- Units with Approved Vacancies for Modernization
 - ✓ Utilizing our Capital Funds, WHA may have the opportunity to modernize some of our communities, which may include Approved Vacancies, if needed, and may affect 1 or more of our properties listed above.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
 - ✓ As one of our goals is to seek additional grant funding to fulfill our mission, WHA may pursue grants that would bring additional money to the agency to improve one or more of our properties listed above.
- Emergency Housing Vouchers
 - ✓ WHA received 27 EHVs. We are taking referrals from the local CoC. We have requested additional vouchers but have not received more. We will request additional vouchers again if the opportunity arises.
- Jobs Plus
 - ✓ (WHA) was notified that it is one of twelve (12) grantees awarded a total of \$28 million by the Department of Housing and Urban Development (HUD) through its Jobs Plus program. WHA's portion is \$2.3 million. As required by the grant guidelines, applicants must demonstrate at least a 25% match in in-kind services by local partners. WHA exceeded this amount, showing \$1.2 million in in-kind support, a 52% match.
 - ✓ The grant will include salaries for a Jobs Plus Supervisor, two Jobs Plus Coordinators, and two Community Coaches (part-time).
 - ✓ Through recent data gathering at Houston Moore and Creekwood South, WHA has concluded that access to job readiness, job training, education, employment placement, access to childcare assistance, access to transportation assistance are top issues to be mitigated by the Jobs Plus Program. WHA will implement the three-pronged evidenced-based best practice approach encompassing the following three core elements: Employment Related Services, Financial Incentives (JPEID) and Community Support for Work. These three core elements focus on common challenges found in public housing communities such as poor work histories, limited education, significant personal and other challenges.
 - ✓ Through the Jobs Plus program, Houston Moore and Creekwood South residents will have at their disposal resources to assist them with attaining their educational and employment goals in an on-site Jobs Plus program center.
 - ✓ The Jobs Plus culture of work stakeholders will include community resource partners that hold best practices in the area of education and employment.
 - ✓ Through the Jobs Plus Program residents will be able to access incentives and subsidies designed to keep their earnings in their bank accounts, as they move towards self-sufficiency. These will include transportation cost coverage and child care stipends. WHA will over four (4) Jobs Plus Skills Academies per year in the area of Customer Service, Healthcare, Business Services and Construction. Each Academy is 48 hours in length and offers an industry-specific

nationally recognized certification. Many of the Jobs Plus program participants will find themselves working in the same community they reside, building an enhanced sense of investment and pride in their community as stakeholders.

- Security Lighting and Crime Prevention Through Environmental Design (CPTED)
 - ✓ WHA may pursue opportunities to enhance the safety and security of our residential properties through the addition and/or enhancement of appropriate security lighting and other CPTED measures, aimed at reducing the occurrence of criminal activity at WHA residential sites.

- Administrative Plan
 - ✓ WHA will update our Administrative Plan this year.

Attachment 3 - AFFH, continued

(Section D.1)

Goal: Improve Access to Employment Training Opportunities: Support agencies providing job training programs. Refer public housing and HCV participants to employment training to promote self-sufficiency.

Goal: Improve Public Perception of Affordable Housing: Host at least one fair housing event annually, host annual workshops with lenders, realtors and landlords, Fair Housing promotional program annually.

Obtain regular Fair Housing Training for all Housing Authority staff.



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Attachment 4

Potential RAD Conversions

- Solomon Towers
- Hillcrest/Hillcrest Annex (RAD/Section 18 Blend)
- Houston-Moore
- Robert S. Jervay Properties

Rental Assistance Demonstration (RAD)

A. Introduction

The Housing Authority of the City of Wilmington, North Carolina (WHA) plans to complete an assessment of Houston Moore, Hillcrest, Solomon Towers, Creekwood South, Creekwood South LLC, Woodbridge, Eastbrook, Vesta Village, New Brooklyn, Scattered Sites, SouthSide 1, and other developments in order to determine the feasibility of a Voluntary Conversion Plan to convert public housing ACC units to the Project-Based Section 8 Program (PBV) under Rental Assistance Demonstration (RAD) under the guidelines of PIH Notice 2012-32 (HA), REV-2 and any successor Notices.

Upon conversion to RAD Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32 (HA), REV-2. These resident rights, participation, waiting list and grievance procedures are further listed below in Section C below.

Additionally, the Authority is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement. This RAD conversion complies with all applicable site selection and neighborhood reviews standards and that all appropriate procedures have been followed.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the Authority with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that the Authority may also borrow funds to address their capital needs.

B. Development Information

Below, please find specific information related to the Public Housing Developments under consideration for conversion to RAD:

Name of Public Housing Development: Creekwood South LIHTC	PIC Development ID: NC01000019	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 138	Pre-RAD Unit Type: Family, LIHTC	Post-RAD Unit Type if different: Family, LIHTC	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for CSLIHTC multiplied by total number of units in project</u>) $3,044.68 * 138 = \$420,166$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	42	42	0
Three Bedroom	36	36	0
Four Bedroom	54	54	0
Five Bedroom	6	6	0
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Creekwood South	PIC Development ID: NC0100008A	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 60	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for CS multiplied by total number of units in project</u>) $3,183.83 * 60 = \$191,030$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom			

Three Bedroom	18	18	0
Four Bedroom	42	42	0
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Eastbrook	PIC Development ID: NC01000020	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 32	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for Eastbrook multiplied by total number of units in project</u>) $1,592.66 * 32 = \$50,965$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	32	32	0
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Hillcrest	PIC Development ID: NC01000005	Conversion Type: Project Based Vouchers (PBV)/Section 18 Blend	Transfer of Assistance: No
Total Units: 216	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for Hillcrest multiplied by total number of units in project</u>)

			2,630.43*216 = \$568,173
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			0
One Bedroom	32	32	0
Two Bedroom	130	130	0
Three Bedroom	54	54	0
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Houston Moore	PIC Development ID: NC01000004	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 150	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for HM multiplied by total number of units in project</u>) 2,725.06*150 = \$408,759
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	61	61	0
Three Bedroom	65	65	0
Four Bedroom	24	24	0
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: New Brooklyn Homes	PIC Development ID: NC01000017	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 48	Pre-RAD Unit Type: Family, LIHTC	Post-RAD Unit Type if different: Family, LIHTC	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for NBH multiplied by total number of units in project</u>) $1,781.98 * 48 = \$85,535$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	26	26	0
Three Bedroom	20	20	0
Four Bedroom	2	2	0
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Scattered Sites	PIC Development ID: NC01000018	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 7	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for SS multiplied by total number of units in project</u>) $1,836.00 * 7 = \$12,852$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom			
Three Bedroom	7	7	0

Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Solomon Towers	PIC Development ID: NC01000007	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 151	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for ST multiplied by total number of units in project</u>) $2,214.77 * 151 = \$334,430$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	100	100	0
One Bedroom	50	50	0
Two Bedroom	1	1	0
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: SouthSide 1	PIC Development ID: NC01000022	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 1	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for SS1 multiplied by total number of units in project</u>) $1,676.00 * 1 = \$1,676$

Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom			
Three Bedroom	1	1	0
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Vesta Village	PIC Development ID: NC01000008C	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 43	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for Vesta multiplied by total number of units in project</u>) $3,047.88 * 43 = \$131,059$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	16	16	0
Three Bedroom	4	4	0
Four Bedroom	22	22	0
Five Bedroom	1	1	0
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public	PIC	Conversion	Transfer of Assistance:
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Housing Development: Woodbridge	Development ID: NC01000016	Type: Project Based Vouchers (PBV)	No
Total Units: 24	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (Annual Capital Fund Grant for Woodbridge multiplied by total number of units in project) $1,669.17 * 24 = \$40,060$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom			
Two Bedroom	12	12	0
Three Bedroom	12	12	0
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Hillcrest Annex	PIC Development ID: NC010000082	Conversion Type: Project Based Vouchers (PBV)/Section 18 Blend	Transfer of Assistance: No
Total Units: 40	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (Annual Capital Fund Grant for Rankin multiplied by total number of units in project) $2,192.28 * 40 = \$87,691$
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	28	28	
One Bedroom	8	8	
Two Bedroom	4	4	
Three Bedroom			
Four Bedroom			

Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Jervay Communities	PIC Development ID:	Conversion Type: RAD	Transfer of Assistance: No
Total Units: 71	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for WHA multiplied by total number of units in project</u>) 1,643.49*71=116,688
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	21	21	
Two Bedroom	30	30	0
Three Bedroom	20	20	0
Four Bedroom			0
Five Bedroom			0
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Name of Public Housing Development: Dawson Lofts	PIC Development ID: NC010000083	Conversion Type: Project Based Vouchers (PBV)	Transfer of Assistance: No
Total Units: 24	Pre-RAD Unit Type: Family	Post-RAD Unit Type if different: Family	Capital Fund allocation of Development: (<u>Annual Capital Fund Grant for Dawson Lofts multiplied by total number of units in project</u>) 1,496.38*24 = \$35,913
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why: (De Minimis Reduction, Transfer of assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	12	12	0
Two Bedroom	12	12	0
Three Bedroom			
Four Bedroom			
Five Bedroom			
Six Bedroom			
If performing a Transfer of Assistance:	Explain how transferring waiting list: N/A		

Resident Rights, Participation, Waiting List and Grievance Procedures

C. Resident Rights and Participation

- 1. Right to Return.** Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project's conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved residents of the converting project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and

thereby waive their right to return to the development after rehabilitation or construction is completed.

- 2. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- 3. Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the family may remain in this unit until an appropriate-sized unit become available in the covered Project. When an appropriate sized unit becomes available in the covered Project, the family living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the covered Project, 24 CFR 983.259 is waived.
- 4. Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), the PHA must renew all leases upon lease expiration, unless cause exists. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.
- 5. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

WHA Policy: If, due to the RAD conversion, the tenant's monthly rent increases more than 10% or \$25 whichever is greater, a three (3) year phase in will be implemented according to the Three-Year Phase-in scheduled below.

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

Three Year Phase-in:

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

Five Year Phase in:

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

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

- 6. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are current FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds, to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that there are certain FSS requirements (e.g. escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, and participants' contracts of participation, and the alternative requirements established in the

“Waivers and Alternative Requirements for the FSS Program” Federal Register notice, published on December 29, 2014, at 79 FR 78100. Further, upon conversion to PBV, already escrowed funds for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.

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

7. **Resident Participation and Funding.** In accordance with Attachment 1B (attached), residents of covered projects with converted PBV assistance will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
8. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner’s lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
 - a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to Project owner termination of tenancy and eviction, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - a. If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - b. In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. 14 days in the case of nonpayment of rent; and
 - iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
 - b. **Grievance Process.** Pursuant to the requirements in the RAD Statute, HUD has established additional procedural rights to comply with the requirements of section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the Project Owner/PHA (hereinafter “Project Owner”) to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will

specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - a. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
 - b. For any additional hearings required under RAD, the Project Owner will perform the hearing.
- ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or contract administrator.
- iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The Project Owner provides opportunity for an informal hearing before an eviction.

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

WHA Policy: The hearing procedures for PBV and PBV clients converted under RAD are outlined in Chapter 18 of the WHA HCV Administrative Plan.

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

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

10. When Total Tenant Payment Exceeds Gross Rent. Under normal PBV rules, the PHA may only select an occupied unit to be included under the PBV HAP contract if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(d)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent)) (24 CFR § 983.258). Since the rent limitation may often result in a family's TTP equaling or exceeding the gross rent for the unit, for current residents (i.e. residents living in the public housing property prior to conversion), HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that the rent to owner for the unit equal the family's TTP until such time that the family is eligible for a housing assistance payment. HUD is waiving as necessary to implement this alternative provision, the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR 983.301 as modified by PIH Notice 2012-32, REV-2. In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Assistance may subsequently be reinstated if the tenant becomes eligible for assistance.

Following conversion, 24 CFR § 983.53(d) applies, and any new families referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program, which means their TTP may not exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP come to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has vacated the property; and, if the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR § 983.207 or, where "floating" units have been permitted.

11. Transfer of Assistance. Not Applicable.

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

WHA Policy: WHA does not receive CFCF funding, therefore this section is not applicable.

D. PBV: Other Miscellaneous Provisions

Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.

1. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.
2. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).**
 - i. The Davis-Bacon prevailing wage requirements (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) apply to all initial repairs and new construction that are identified in the Financing Plan to the extent that such repairs or construction qualify as development. "Development", as applied to work subject to Davis-Bacon requirements on Section 8 projects, encompasses work that constitutes remodeling that alters the nature or type of housing units in a PBV project, reconstruction, or a substantial improvement in the quality or kind of original equipment and materials, and is initiated within 18 months of the HAP contract. Development activity does not include replacement of equipment and materials rendered unsatisfactory because of normal wear and tear by items of substantially the same kind. Davis-Bacon requirements apply only to projects with nine or more assisted units.
 - ii. Section 3 (24 CFR Part 135) applies to all initial repairs and new constructions that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation. In addition, Section 3 may apply to the project after conversion based on the receipt of the use of federal financial assistance for rehabilitation activities.
3. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents for the covered Project will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - i. Transferring an existing site-based waiting list to a new site-based waiting list. If the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list.
 - ii. Informing applicants on the site-based waiting list on how to apply for a PBV program-wide or HCV program-wide waiting list.

- iii. Informing applicants on a public housing community-wide waiting list on how to apply for a voucher-wide, PBV program-wide, or site-based waiting list. If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies.

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

4. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project.
5. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
6. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

- 7. Administrative Fees for Public Housing Conversions during Transition Period.** For the remainder of the Calendar Year in which the HAP Contract is effective (i.e. “transition period”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing Annual Contributions Contract (ACC) between the PHA and HUD will be amended to reflect the number of units under the HAP contract, but will be for zero dollars, and the RAD PBV contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMA during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.
- 8. Choice Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant-based rental assistance, in the form of either assistance under the voucher program or other comparable tenant- based rental assistance. If as a result of participation in RAD a significant percentage of the PHA’s HCV program becomes PBV assistance, it is possible for most or all of the PHA’s turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant-based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing an alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP contract administered by the PHA exceeds 20 percent of the PHA’s authorized units under its HCV ACC with HUD.

The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the request from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA’s administrative plan. This alternative requirement does not apply to PBVs entered into outside of the context of RAD.

- 9. Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet project requirements.

Significant Amendment Definition

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

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



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Attachment 5

Public Notice



PUBLIC NOTICE OF 2023 ANNUAL PLAN SIGNIFICANT AMENDMENT

The **HOUSING AUTHORITY OF THE CITY OF WILMINGTON, NORTH CAROLINA** (WHA) is amending our Annual Plan for FY 2023.

This is a 45-day notice with an opportunity to present public comments regarding proposed amendments to the 2023 WHA Annual Plan.

The draft of the proposed WHA Amended 2023 Annual Plan is available for review beginning **Friday, April 28, 2023**, at the WHA website at www.wha.net and at the WHA Central Office, 1524 S. 16th Street, Wilmington, NC 28401.

Comments must be made in writing and presented to the main office located at 1524 S. 16th Street, Wilmington, NC 28401, Attn: John Batey, WHA Senior VP (jbatey@wha.net), no later than **2:00PM EDT, Tuesday, June 13, 2023**.

A public hearing will be conducted on Tuesday, June 13, 2023, at 2:00 PM EDT in the 2nd Floor Executive Conference Room of WHA’s Central Office, 1524 S. 16th Street, Wilmington, NC 28401. Anyone interested in commenting on the proposed revisions is invited to attend.

- In addition, the proposed Wilmington Housing Authority (WHA) Amended 2023 Annual Plan will be provided for public viewing at the following locations:

Property AMP Number	Property Name	Property Addresses
NC001000004	HOUSTON MOORE TERRACE	1601 S. 13 th St Wilmington, NC 28401
NC001000005	HILLCREST APARTMENTS	1402 Meares St. Wilmington, NC 28401
NC001000007	SOLOMON TOWERS	15 Castle St. Wilmington, NC 28401
NC001000080	CREEKWOOD SOUTH	714 Emory St Wilmington, NC 28401
NC001000017	NEW BROOKLYN HOMES	1214 4 th St Wilmington, NC 28401



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Attachment 6

2022 CFP Annual Statement

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: NC19P001501-23 Replacement Housing Factor Grant No: Date of CFFP: 01/2023		FFY of Grant: 2023 FFY of Grant Approval: 2023	
PHA Name: The Housing Authority of the City of Wilmington, NC NC001		Reserve for Disasters/Emergencies Original Annual Statement Performance and Evaluation Report for Period Ending: Summary by Development Account		Revised Annual Statement (revision no:) Final Performance and Evaluation Report	
Line	Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Summary by Development Account	Original	Revised ²	Obligated	Total Actual Cost ¹ Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	\$614,514.00			
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$307,257.00			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement	\$700,000.00			
10	1460 Dwelling Structures	\$1,165,352.52			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs	\$200,000.00			
17	1499 Development Activities ⁴				

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

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 06/30/2017

Part I: Summary		FFY of Grant: 2023 FFY of Grant Approval: 2023	
PHA Name: The Housing Authority of the City of Wilmington, NC NC001	Grant Type and Number Capital Fund Program Grant No. NC19P001501-23 Replacement Housing Factor Grant No. Date of CFFP: 01/2023		
Type of Grant		<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Summary by Development Account <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHIA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$85,446.48	
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$3,072,570.00	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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



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Attachment 7

Civil Rights Certification

**Certifications of Compliance
with PHA Plan 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 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and
Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning _2023_, 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 (24 CFR § 91.2).
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 (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
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 provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. 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.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its 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 maintains records reflecting these analyses and actions.
8. For PHA Plans that include 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 2011-65);
 - 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; and
 - 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 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. 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.
12. 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.
13. 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. 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.
16. 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.
17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
18. 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.

19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. 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.
21. 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 Wilmington
PHA Name

NC-001
PHA Number/HA Code

Annual PHA Plan for Fiscal Year **2023** (Amended)

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 Executive Director		Name Board Chairman
Signature	Date	Signature
_____	_____	_____

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. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year 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.



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Attachment 8

Certification by Official / Consistency with Consolidated Plan

**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, Tony Caudle, the City Manager
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or 2023 Amended Annual PHA Plan of the
Housing Authority of the City of Wilmington
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 Wilmington
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

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

The Housing Authority has collaborated with the City of Wilmington on the 2016 Assessment of
Fair Housing to affirmatively further fair housing through its programs.

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
Signature	Date



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Attachment 9

RAB Meeting Comments

(Comments TBD pending RAB Meeting)



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Attachment 10

Public Hearing Comments

(Comments TBD pending 6/13/2023 Public Hearing)