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. 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 <u>do not</u> 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 <u>both</u> of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, 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 PHA Name: Lynchburg Redevelopment and Housing Authority PHA Code: VA013
- A.1 | PHA Type: Standard PHA | Troubled PHA
 - PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/01/2024

PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) **Number of Public Housing (PH) Units** <u>328</u> **Number of Housing Choice Vouchers (HCVs)** <u>1,192</u> **Total Combined Units/Vouchers 1,520**

PHA Plan Submission Type: Annual Submission Revised Annual Submission Availability of Information. PHAs must have the elements listed below in sections B and C 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.

Copies of the FY 2024 Annual Plan can be obtained at the PHA's Main Office at the following address:

Lynchburg Redevelopment and Housing Authority 1948 Thomson Drive Lynchburg, Virginia 24501

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the	No. of Units in Each Program	
1 al utipating 1 1145	THA Coue	riogram(s) in the Consolita	Consortia		HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

- (a) Have the following PHA Plan elements been revised by the PHA?
- Y N
- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
 - Financial Resources.
- \boxtimes \square Rent Determination.
- Operation and Management.
- \square Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- \square Safety and Crime Prevention.
 - $\square Pet Policy.$
 - \Box Asset Management.
 - \subseteq \square Substantial Deviation.
- Significant Amendment/Modification

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

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 lowincome families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

A current status of the housing market in Lynchburg, Virginia has been documented in an article (Lynchburg Area's Housing Affordability, Availability Crisis puts Stress on Low-Income Individuals, Housing Affiliates) written by Rachael Smith: Richmond Times-Dispatch: Lynchburg News & Advance: July 4, 2021. Rachael Smith's article is as follows:

"Low-income Lynchburg residents are finding fewer housing options as families with more resources decamp to the Hill City, an area in the City of Lynchburg warn local nonprofit agencies and housing experts. Droves of people flooding in have stressed demand, said Wendy Witt, a Lynchburg Association of Realtors board member and owner of the Wendy Witt Group with eXp Realty; one factor leading Lynchburg residents who don't wish to leave feeling the pinch.

B.1

"People can sell in D.C. and have a lot of equity and just come here and pay cash and not worry about what jobs are here when it's very affordable," she said. "So, of course, that is driving up all of the prices." She added people not only are struggling to find homes to buy but also to rent as rental prices have increased 10% and 30% from a year ago. Witt has seen homes hit the market that should be listed at about \$130,000 but instead are going for \$199,000 — and they sell because of the high demand.

Interest rates also are incredibly low right now, further incentivizing buyers. Witt said she thinks this will slow down at some point, though, and she already is seeing it for homes that would have received multiple offers a few months ago. "Now houses are on the market a week or two before we get the contract," she said. "So it's starting to simmer down just a bit. And I think that's going to be a good thing."

Donna Vincent, Executive Director for Habitat for Humanity, said even though there are new additional costs this year due to an increase in building supplies — such as lumber, which went up 400% in the past year — the organization decided last week to move forward with building affordable homes in the community. Pre-pandemic, the organization could buy a pre-cut 2-by-4 for framing walls for \$3 or \$4, but that price has risen to \$12, Vincent said. Plywood was between \$8 and \$9 per sheet but a few weeks ago it hit \$50. "This is a struggle across Habitats across the nation," she said. "Some are proceeding and using their cash reserves to absorb the additional costs and some are pausing and just hoping prices are going to come down." One solution is to go to vendors that Habitat uses and ask them to set aside a supply for them at a certain price. Vincent said some affiliates are finding cooperation from larger retail stores for that. "We have not gone that route yet, but we are getting ready to," she said. There is affordable housing in Lynchburg, she said, but what happens is people of modest means are not living in some of the places that are affordable.

Mary Mayrose, Executive Director of the Lynchburg Redevelopment and Housing Authority, said the rental market in Lynchburg swings between very few available units that are affordable and several new multi-family developments that have been constructed in the past five years. "So the availability for market-rate units seem to be pretty open, but you have to have an income of significance, probably 150% of [the area's median income] to afford many of those units. And it's probably the same kind of measure when it comes to homeownership as well," she said. She said there is a long waiting list — more than 250 families — for public housing units and nearly 1,200 families on the waiting list for Section 8 housing vouchers. "There is a great need and there is no silver bullet to solving this problem," she said. "It's going to take a lot of community resources, lot of our resources and a lot of federal resources to solve this problem."

According to Virginia Housing Development Authority, the median income in Lynchburg in 2021 is \$72,400. LRHA, along with Rush Homes, Miriam's House and some other groups have created a housing collaborative to come up with initiatives to work with city officials on either providing more access to affordable housing, providing more subsidy or figuring out ways to develop new affordable housing to address the needs of the community.

B.1	"Housing is the first step," Mayrose said. "If a family doesn't have housing, so many other things in the family breakdown. Children are unable to go to school, everybody gets sick, nobody's getting the right amount of food. So my opinion is, we have to shelter all families. We've got to get housing for people. Families need it. And this is not just families of four or six, this is seniors, this is disabled individuals in our community. We've got to take care of our families and then our community begins to thrive and grow."
	In another news article on the status of housing in Lynchburg, Virgina (Rent Rates on the Rise in Lynchburg) written by Mia Nelson: WSET ABC News: February 13, 20222. Mia Nelson's article is as follows:
	"The cost to keep a roof over your family's head is on the rise in the Lynchburg area. According to the Department of Housing and Urban Development, the Fair Market Rent (FMR) in 2022 for a two-bedroom apartment in the Lynchburg area is \$863. In 2021, it was \$784. That's about a 10% increase.
	Mary Mayrose, Executive Director of the Lynchburg Redevelopment and Housing Authority, said they base their rent rates off of the FMR and it can be contributing factor in the rent rates of landlords and property management groups. According to Mayrose, the Lynchburg Redevelopment and Housing Authority's average rent is \$512. In 2020 to 2021 that number was \$421.
	"What is really difficult for us is to have such a big jump from last year's fair market rents to this year's fair market rents," Mayrose said. "So two percent, three percent increases, we can all kind of live with that, but when it gets to be five, six, seven percent increase in rent, that's really difficult for us," Mayrose said.
	She said this increase is making it difficult for the families they assist, to find affordable apartments. "What that means is that for the families we assist, for example, our rental assistance programs, it is very difficult for them to find apartments because the rent is so high," Mayrose said. She said the drastic increase in rent also means they have less money in their budget to help more families. She said they're having to give out fewer Housing Choice Vouchers.
	"I'm a little stagnant right now, it's like, somebody goes off the program, I got a voucher I can issue, but there may be at the most five, six, a month. It's not very many," Mayrose said. Mayrose said their goal is for people to eventually get off of voucher assistance, but the increased rent rates are making this a challenge as well. She also expects rent to continue to climb.
	"I can't think of a time in my 30-some year experience in housing that rents have gone down," Mayrose said.

B.1 Affordability

52.1%% of the housing tenure is renter occupied in Lynchburg, Virginia.

47.9% of families in occupied rental units are paying more than 30% of gross rent as a percentage of house income.

Source: U.S. Census Bureau, DP04, 2021 American Community Survey 1-Year Estimates Data Profiles

Supply

HOUSING OCCUPANCY	NUMBER	PERCENTAGE
Total housing units	34,156	100%
Occupied housing units	28,346	83.0%
Vacant housing units	5,810	17.0%
Homeowner vacancy rate	2.8	(X)
Rental vacancy rate	15.9	(X)
UNITS IN STRUCTURE		
Total housing units	34,156	100%
1-unit, detached	19,860	58.1%
1-unit, attached	2,968	8.7%
2 units	886	2.6%
3 or 4 units	1,078	3.2%
5 to 9 units	2,627	7.7%
10 to 19 units	3,648	10.7%
20 or more units	2,858	8.4%
Mobile home	231	0.7%
Boat, RV, van, etc.	0	0.0%

Source: U.S. Census Bureau, DP04, 2021 American Community Survey 1-Year Estimates Data Profiles

B.1 Quality

The City of Lynchburg has a total of 34,156 housing units. Of the total housing units 25,331 or 74.1% have been built from 1939-1980, and 6,165 or 24.81% housing units have been built from 1980 to 2020 or later.

YEAR STRUCTURE BUILT

Total Housing Units 34,156

	Units	Percentage
Built 2020 or later	330	1.0%
Built 2010 to 2019	942	10.5%
Built 2000 to 2009	3,597	10.5%
Built 1990 to 1999	1,296	3.8%
Built 1980 to 1989	3,245	<u>9.5%</u>
Built 1970 to 1979	4,783	<u>14.0%</u>
<u>Built 1960 to 1969</u>	4,347	12.7%
<u>Built 1950 to 1959</u>	4,038	<u>11.8%</u>
Built 1940 to 1949	1,711	5.0%
Built 1939 or earlie	r 7,207	21.1%

Housing Age

One of these challenges is the age of the City's housing stock. Fifty-four% of the City's homes have been built from 1939-1980 years old, which is ten years older than the median for the Commonwealth as a whole. More than 42 percent of the City's homes were built in 1959 or earlier. This creates a variety of challenges, including the suitability of structures for current lifestyles, energy efficiency (heating and cooling costs), parking and general maintenance needs.

0.1% lack complete plumbing facilities, and, 0.3% lack complete kitchen facilities.

<u>Source: U.S. Census Bureau, DP04, 2021 American Community Survey 1-Year Estimates</u> <u>Data Profiles;</u>

B.1 City of Lynchburg: Comprehensive Plan: Planning for the Future 2013-2030

Accessibility

Currently there are 130 apartments available in Lynchburg City which are wheelchair accessible. All new rental housing built in the City of Lynchburg complies with accessibility requirements. In addition to the Lynchburg Redevelopment and Housing Authority's stock of accessible units, the Low-Income Housing Tax Credit properties in the community have been identified with accessible and ADA compliant rental units for low to moderate income families.

Rush Homes (a 501c3), is a Virginia Department of Housing and Community Development and City of Lynchburg certified Community Housing Development Organization. We are also a Virginia Housing Development Authority Certified Property Manager. They specialize in providing housing for the low-income and persons with disabilities. Their waiting list, as of this writing is 330 families.

It must be noted that as of March 1, 2021 Governor Northam announced over \$24 Million in Affordable and Special Needs Housing Loans | DHCD (virginia.gov) and as part of this funding Rush Homes Inc. will be building Florida Terrace, which will provide 31 affordable and accessible new construction apartments primarily for individuals and families with disabilities who also have incomes less than 60 percent of the AMI. Florida Terrace will set aside eight one-bedroom units for Permanent Supportive Housing and four units for persons with developmental disabilities. The Permanent Supportive Housing units will have rent subsidy via project-based vouchers provided by the Lynchburg Redevelopment and Housing Authority. The project includes one 23-unit, two-story building with an elevator and two additional quadruplexes with units at ground level. Please refer to *Former Governor Northam Announces Over \$24 Million in Affordable and Special Needs Housing Loans | DHCD (virginia.gov)*

(Please see the Location section below with Maps and Addresses for available housing in Lynchburg, Virginia that includes wheelchair accessible units, low-income housing units including Low-Income Tax Credit properties)

<u>{Please see the Next Page for a Continuation of the Statement of Housing Needs and Strategy</u> <u>for Addressing Housing Needs}</u>

B.1 Size of Units

	<u>NUMBER</u>	PERCENTAGE
UNITS IN STRUCTURE		
Total housing units	34,156	100%
1-unit, detached	19,860	58.1%
1-unit, attached	2,968	8.7%
2 units	886	2.6%
3 or 4 units	1,078	3.2%
5 to 9 units	2,627	7.7%
10 to 19 units	3,648	10.7%
20 or more units	2,858	8.4%
Mobile home	231	0.7%
Boat, RV, van, etc.	0	0.0%

Source: U.S. Census Bureau, DP04, 2021 American Community Survey 1-Year Estimates Data Profiles;

Location

Please find attached **VA013a01WheelchairAccessibleApartmentsAvailable**-for a copy of a map and addresses of 127 wheelchair accessible apartments available, as of this writing for rent in Lynchburg, Virginia.

Please find attached **VA013b01Low-IncomeApartmentsAvailableLynchurgVa**-for a copy of a map and addresses of 18 low-income apartments available, as of this writing for rent in Lynchburg, Virginia.

Please find attached **VA013c01AllApartmentsAvailableForRentLynchurgVa-**for a copy of a map and addresses of 539 apartments available, as of this writing for rent in Lynchburg, Virginia.

Source: http://www.apartments.com

Please find attached **VA013d01Low-IncomeTaxCreditPropertiesLynchurgVa**-for a copy of a map and addresses all low-income Tax Credit apartments in Lynchburg, Virginia.

Source: LIHTC Database Lynchburg, Virginia.

Please find attached **VA013e01USCensusBureauDP04Data** all aforementioned data in response for the required identification of housing needs that address issues of affordability, supply, quality, accessibility, size of units, and location.

Source: U.S. Census Bureau, DP04, 2021 American Community Survey 1-Year Estimates Data Profiles

{Please see the next two pages for housing needs of Housing Choice Voucher and Public Housing families on the PHA's waiting lists}

Housing Needs of Families on the PHA's Waiting List						
Waiting List Type: (Select One) Section 8 Tenant-Based Assistance						
						 ✓ Public Housing Combined Section 8 and Public Housing
Public Housing Site-Based or sub-jurisdictional waiting list (optional)						
If used, identify which						
	# of families	% of total families	Annual Turnover			
Waiting List Total	1932	100 %	71			
Extremely Low Income	1 296	(70)				
<=30% AMI	1,286	67%				
Very Low Income>50% but <80% AMI	242	13%				
Low Income >50% but	242	1370				
<80% AMI	82	4%				
Families with Children	1393	72%	1			
Elderly Families	124	6%	1			
Families with Disabilities	414	21%				
Race/Ethnicity-White	717	2.1 /0				
Race/Ethnicity-White	608	31%				
Race/Ethnicity-Black	000	5170				
Ruce Dunierty Duck	1,054	55%				
Race/Ethnicity-Hispanic	,					
5 1	60	3%				
Race/Ethnicity-						
Asian						
	1	0.05%				
Race/Ethnicity-	10	0.010/				
Indian/Alaskan	12	0.01%				
Mixed		6%				
WIXed	108	070				
Other	48	2%				
	# of	% of Families	Annual Turnover			
	Families					
Characteristics by Bedroon						
Size (Public Housing Only)						
0BR	N/A	N/A				
1BR	987	51%				
40.0		0501				
2BR	521	27%				
3 BR	240	12%				
4 BR	103	5%				
5 BR	25	1%				

Public Housing Site	Based Assistance 8 and Public Housir	dictional waiting list (opt	tional)
	# of families	% of total families	Annual Turnove
Waiting List Total	953	100 %	26
Extremely Low Income <=30% AMI	712	75%	
Very Low Income>50% but <80% AMI	148	16%	
Low Income >50% but <80% AMI	74	8%	
Families with Children	679	71%	
Elderly Families	67	6%	
Families with Disabilities	254	27%	
Race/Ethnicity-White	142	15%	
Race/Ethnicity-Black	708	74%	
Race/Ethnicity-Hispanic	43	5%	
Race/Ethnicity- Asian/Pacific Islander	6	1%	
Race/Ethnicity- Mixed	46	5%	
Other	28	3%	

<u>PHA's strategy for addressing the housing needs of families in the jurisdiction and on the</u> <u>waiting list in the upcoming year</u>

B.1

The Lynchburg Redevelopment and Housing Authority will maximize the number of assisted/affordable units available to the PHA within its current resources by:

- Continuing to employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reducing the turnover time for vacated public housing units
- Maintain Turnaround time to renovate public housing units
- Undertaking measures to ensure access to affordable housing among families assisted by the PHA

The Lynchburg Redevelopment and Housing Authority will increase the number of affordable units by:

- Leverage affordable housing resources in the community through the creation of mixedfinance housing so as to ensure an ongoing inventory of decent, safe and affordable housing.
- Increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- > Pursue housing resources other than public housing or section 8 tenant-based assistance
- Participate in the Consolidated Plan process to ensure coordination with broader community strategies

The Lynchburg Redevelopment and Housing Authority's Housing CHOICE Voucher Program will target available assistance to families at or below 75% of AMI

Maintain the required HUD federal targeting requirements at or below 30% of AMI in the tenant-based Housing CHOICE Voucher Program

The Lynchburg Redevelopment and Housing Authority will target available assistance to families with disabilities

- > Affirmatively market to local non-profit agencies that assist families with disabilities
- Leveraging resources from partner organizations to cover the cost for individuals with disabilities to help with rent deposit, move-in costs, home supplies and furniture.
- Creating a preference for non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless.
- The Lynchburg Redevelopment and Housing Authority administers the State Rental Assistance Program (SRAP) which is a rental assistance program funded by the Virginia Department of Behavioral Health & Developmental. This program provides rent subsidies to individuals with developmental disabilities so they can afford to rent housing in local neighborhoods and live in diverse communities that include people with and without disabilities. Individuals receive case management that links them to supportive services and community resources to help them live independently.

B.1	Continue to apply for Mainstream Program Vouchers for non-elderly disabled and HUD Continuum of Care funding to provide a Permanent Supportive Housing Program-Housing First Lynchburg for homeless individuals/families in the City of Lynchburg.
	The housing strategies selected by the Lynchburg Redevelopment and Housing Authority were all influenced by:
	Housing constraint
	Staffing constraints
	Limited availability of sites for assisted housing
	> Evidence of housing needs as demonstrated in the Consolidated Plan and other information

- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents

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))

{Please see the next page for a statement of financial resources}

Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2023		
grants)		
a) Public Housing Operating Fund	\$1,308,724	
b) Public Housing Capital Fund	\$1,189,714	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$6,867,720	
 f) Public Housing Drug Elimination Program (including any Technical Assistance funds) 		
g) Resident Opportunity and Self- Sufficiency Grants	\$215,635	
h) Community Development Block Grant	\$161,432	
i) HOME	\$82,436	
Other Federal Grants (list below)	· · ·	
(unobligated funds only) (list below) CFP (2022)	\$1,186,040	
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental	\$1,186,040 \$1,189,047 \$653,604	PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental	\$1,189,047	PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income	\$1,189,047	PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below)	\$1,189,047	PH Operations PH Operations PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges	\$1,189,047 \$653,604	
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges 4. Non-federal sources (list below)	\$1,189,047 \$653,604	
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges 4. Non-federal sources (list below)	\$1,189,047 \$653,604 \$11,200	PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges 4. Non-federal sources (list below) Interest Income	\$1,189,047 \$653,604 \$11,200 \$88	PH Operations
2. Prior Year Federal Grants (unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges 4. Non-federal sources (list below) Interest Income Total resources	\$1,189,047 \$653,604 \$11,200 \$88	PH Operations
(unobligated funds only) (list below) CFP (2022) CFP (2023) 3. Public Housing Dwelling Rental Income 4. Other income (list below) Tenant Charges 4. Non-federal sources (list below) Interest Income	\$1,189,047 \$653,604 \$11,200 \$88	PH Operations

B.1 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))

Please see **VA013f01forACOPRevision** for Lynchburg Redevelopment and Housing Authority Policies that govern Eligibility, Selection and Admissions.

Please see **VA013g01forAdministrativePlanRevision** for Lynchburg Redevelopment and Housing Authority Policies that govern Eligibility, Selection and Admissions.

Deconcentration Policy

The PHA must submit its Deconcentration Policy for Field Office review.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2] The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)]. Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

B.1 Lynchburg Redevelopment and Housing Authority (LRHA) Policy

The LRHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

LRHA Policy

The LRHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- > Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)]. If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

B.1 LRHA Policy

For developments outside the EIR the LRHA will take the following actions to provide for deconcentration of poverty and income mixing:

- Skipping a family on the waiting list or transfer list to reach another family in an effort to further the goals of the LRHA de-concentration policy:
- Skipping a family on the waiting list or transfer list to reach another family in an effort to further the goals of the LRHA de-concentration policy:
- ➢ If a unit becomes available at a development above the EIR, the first eligible family on the waiting list (or transfer list) with income below the EIR will be offered the unit. If that family refuses the unit, the next eligible family on the waiting list (or transfer list) with income below the EIR will be offered the unit. The process will continue in this order.
- If there is no family on the waiting list (or transfer list) with income below the EIR, or no family with income below the EIR accepts the offer, then the unit at a development above the EIR will be offered to the first eligible family on the waiting list (or transfer list) in preference order regardless of income.
- Skipping of families for de-concentration purposes will be applied uniformly to all families.
- A family has the sole discretion to accept an offer of a unit made under the LRHA's deconcentration policy. The LRHA shall not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the LRHA's de-concentration policy.
- However, the LRHA shall uniformly limit the number of offers received by applicants (and transfer families) described in this chapter.
- The LRHA shall establish a preference for admission of working families in covered developments below the EIR.
- The LRHA shall target investment and capital improvements toward covered developments below the EIR to encourage applicant and transfer families whose income is above the EIR to accept units in those developments. These improvements are described in the LRHA Annual and Five-Year Plan.
- The LRHA shall offer incentives to families with incomes above the EIR willing to move into a development with average income below the EIR and/or to families with incomes below the EIR willing to move into a development with average income above the EIR. These incentives are described in the LRHA Annual and Five-Year Plan.

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

LRHA Policy

Families will be selected from the waiting list based on preference. Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the LRHA

B.1

When selecting applicants from the waiting list, the LRHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The LRHA will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and LRHA policy.

An Annual analysis of family developments to continue to de-concentrate poverty and assure income-mixing. - Perform annual deconcentration analysis. –The following is the August 2023 de-concentration analysis, this report certifies and assures income mixing efforts executed by the LRHA and shows compliance with HUD's and the LRHA's de- concentration goals and objectives with De-concentration of poverty and income mixing in all of its family developments:

Total Income:	\$6,691,149		
Number of Families:	\$	309	
Average Income:	\$	21,654	
Percentiles:			
0.85	\$	18,450	
1.15	\$	24,902	
Dearington 13-01	\$	19,016	
Birchwood 13-03	\$	24,496	
Langview 13-04	\$	17,987	
Brookside13-05	\$	24,027	

Lanview overall average is \$463.00 under the 85% ceiling. Since Langview is under the 85% ceiling LRHA will take the aforementioned actions to provide for deconcentration of poverty and income mixing.

The Department will continue to affirmatively further fair housing and will strive to ensure income mixing continues at 100% of the average income for its family development.

public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 (§903.7(d))
Please see VA013f01forACOPRevision for Lynchburg Redevelopment and Housing Author policies that govern Rent Determination.
Operation and Management. A statement of the rules, standards, and policies of the PH 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. (<u>24 CFR §903.7(e)</u>)
There have been no revisions since the last Annual Plan submission to the Lynchburg Redevelopment and Housing Authority's 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. <u>CFR §903.7(e)</u>)
There have been no revisions since the last Annual Plan submission to the Lynchburg Redevelopment and Housing Authority's Operation and Management.
Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (<u>24 CFR §903.</u>
Please see VA013f01forACOPRevision to the Lynchburg Redevelopment and Housing Authority's Grievance Procedures.
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 has applied or will apply for approval. (<u>24 CFR §903.7(k)</u>)
There have been no revisions since the last Annual Plan submission to Lynchburg Redevelop and Housing Authority's Homeownership Programs.

B.1 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))

Please see **VA013f01forACOPRevision** to the Lynchburg Redevelopment and Housing Authority's Safety and Crime Prevention (VAWA) Program.

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

Please see **VA013f01forACOPRevision** to the Lynchburg Redevelopment and Housing Authority's Pet Policy.

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))

There have been no revisions since the last Annual Plan submission to Lynchburg Redevelopment and Housing Authority's Asset Management functions.

B.1 Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

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

Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

In accordance with HUD regulations, (24 CFR 903.7(3)(ii) and PIH Notice 1999-15), the LRHA has defined below the criteria that it will use for determining substantial deviation from its (5) year plan and significant amendment or modification to its Annual Plan.

Criteria for "Substantial Deviation" from the (5) Year Plan includes:

A major change to the LRHA (5) Year Plan pertaining to its mission, goals and objectives would constitute a "Substantial Deviation". Creation of new programs, or major revisions or elimination of existing Housing Choice Voucher or Public Housing Programs or Services that have a fiscal impact of greater than 20% of the respective program budgets.

<u>Criteria for "Significant Amendment or Modification" of the LRHA Annual Plan program</u> <u>includes:</u>

- > Changes that revises the LRHA's mission, goals or objectives;
- > Changes to rent or admission policies or organization of the waiting list;
- Additions of a Capital Fund Project or non-emergency work items that are not in the current annual statement or (5) Year action Plan in an amount equal to or greater than \$500,000.00;
- Changes in the use of replacement reserve funds under the Capital Fund program in an amount equal to or greater than \$500,000.00;
- Demolition, disposition, designation, Homeownership, RAD conversion, Capital Fund Financing, development, or mixed financing; Any other event or activity that the Authority's Board of Commissioners determines to be a "Significant Amendment or Modification"

"Significant Amendments or Modifications" that are not defined as being significant include:

- The transfer of work projects from one grant year to another in the Capital Fund Program (fungibility), which are included in the approved Capital Fund (5) Year Action Plan;
- The transfer of funds in the Capital Fund Program from one line item to another within the same grant year budget;
- Additional work projects funded by the Capital Fund Program not included in the (5) Year Action Plan, which have been deemed emergencies;

B.1	 Any changes in the Housing Choice Voucher Administrative Plan or Public Housing Admissions and Continued Occupancy Policy, which are not specifically described in the HUD PHA (5) Year and Annual Plan or required PHA Plan elements; Changes that are required due to HUD mandates, regulations, federal statutes, state or local laws/ordinances or as a result of a declared national emergency or local emergency; Changes which are funded by sources other than federal funds will not require Plan amendment or modification
	A significant Amendment or Substantial Deviation/Modification as referenced in the Quality Housing and Work Responsibility Act of 1998, Section 511, (g), may not be adopted, other than at a duly called meeting of the governing board of the Public Housing Agency that is open to the public after a (45) day public notice; and be implemented, until notification of the amendment or modification is provided to the Secretary of the Department of Housing and Urban Development and approved.
	The Lynchburg Redevelopment and Housing Authority hereby gives notice there will be "Substantial Deviations" from the (5) Year Plan that includes: a change in the mission statement; RAD conversions of Dearington and Birchwood; Demolition and or Disposition; Development and Mixed Finance.
	Please make note: the Lynchburg Redevelopment and Housing Authority has updated its ACOP and revised the following: Layout and Design; Chapter 1: Overview; Chapter 2: General Policies; Chapter 3: Fair Housing and Equal Opportunity; Chapter 4: Application, Waiting List & Tenant Selection; Chapter 5: Eligibility; Chapter 6: Occupancy Standards and Unit Offers; Chapter 7: Income and Adjusted Income; Chapter 8: Rent; Chapter 9: Verification; Chapter 10: Leasing and Inspections; Chapter 12: Continued Occupants and Reexaminations; Chapter 13: Pets; Chaper 14: Community Service; Chapter 15: Transfers; Chapter 16: Lease Terminations; Chapter 17: Informal Hearings; Chapter 18: Grievance Procedures: Chapter 19: Rental Assistance Demonstration: Chapter 20: Program Integrity; and, Appendices.
	The Please see VA013f01forACOPRevision for the Lynchburg Redevelopment and Housing Authority updated its ACOP and revised chapters.
	In addition, the following is a summary of the changes pertaining to Section 103 of HOTMA which are the ones now reflected in the ACOP.
	The Lynchburg Redevelopment and Housing Authority in compliance with Section 103 requirements has modified its policies to create new limitations on program participation for families residing in public housing that remain over-income (OI) for 24 consecutive months. After a 24-month grace period, PHA policy may allow OI families to continue to live in a public housing unit paying an alternative rent. If the PHA does not adopt such a policy, the PHA must terminate tenancy of the OI family within six months of the final notification in compliance with 24 CFR 960.507 families exceeding the income limit, and 24 CFR 960.509 Lease requirements for non-public housing over-income families.

Also, revised regulation changed under VAWA are now reflected in the ACOP.

B.1	Please make note: the Lynchburg Redevelopment and Housing Authority has updated its ADMINISTRTIVE PLAN and revised the following: Chapter 4: Application, Waiting List & Tenant Selection; Chapter 10:Verification; Chapter 25: Program Integrity; and, Appendices. The Please see VA013f01AdministrationPlanRevision for the Lynchburg Redevelopment and Housing Authority updated its Administrative Plan and revised chapters. Mission Statement Change The Lynchburg Redevelopment and Housing Authority will be a dedicated leader in providing, promoting and transforming housing opportunities in the greater Lynchburg area by implementing forward leaning solutions that create resilient communities.
B.2	New Activities.
	Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N □ Hope VI or Choice Neighborhoods. □ Mixed Finance Modernization or Development. □ Demolition and/or Disposition. □ Designated Housing for Elderly and/or Disabled Families. □ Designated Housing for Elderly and/or Disabled Families. □ Conversion of Public Housing to Tenant-Based Assistance. □ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. □ Occupancy by Over-Income Families. □ Occupancy by Police Officers. □ Non-Smoking Policies. □ Project-Based Vouchers. □ Units with Approved Vacancies for Modernization. □ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	{Please see next page for B.2 Narrative on New Activities}

B.2 (a) If any of these activities are planned for the current Fiscal Year, describe the activities. for new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/ disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

The Lynchburg Redevelopment and Housing (LRHA) Authority maintains its intention to submit an application to convert various of its Public Housing developments to Project Based under the Project Based Voucher Program as per the guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to Project Based Vouchers, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section of PIH Notice 2019-23 REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are describe below. Additionally, the (LRHA) certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing (LRHA) 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 (LRHA) may also borrow fund to address their capital needs. (LRHA) will also contribute Replacement Housing Factor (RHF) funds and Public Housing Reserve funds.

Significant Amendment Definition:

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

- Changes to the Capital Fund Budgets produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- > Changes to the construction and/or rehabilitation plan for each approved RAD conversion;
- > Changes finance structure for each approved RAD conversion.

UNITS ANTICIPATED TO BE CONVERTED UNDER RAD

The chart below identifies the units anticipated to be converted under RAD. The RAD conversion will include the following elements.

- 1. The unit count will remain the same pre-conversion and post-conversion.
- 2. There will be no change in bedroom distribution, all bedroom sizes will remain the same post-conversion.

B.2	RAD Conversion	Total Units	Property Type
	Dearington Apartments	100 Units	Family Development
	AMP 013-000001	12-1 bedrooms	
	Chambers Street	52-2 bedrooms	
	Lynchburg, Virginia 24501	30-3 bedrooms	
		6-4 bedrooms	
	Birchwood Apartments	103 Units	Family Development
	AMP 013-000003	11-1 bedrooms	
	Hillside Court	32-2 bedrooms	
	Lynchburg, Virginia 24501	40-3 bedrooms	
		15-4 bedrooms	
		5-5 bedrooms	
	Brookside Apartments	75 Units	Family Development
	AMP013-000004	# - 1 bedrooms	
		# - 2 bedrooms	
		# - 3 bedrooms	
	Langview Apartments	50 Units	Family Development
	AMP013-000004	# - 1 bedrooms	
		# - 2 bedrooms	
		# - 3 bedrooms	

PROJECT BASED VOUCHERS RESIDENT RIGHTS AND PARTICIPATION

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.

1. 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.

2. Right to Return. Any residents 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. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development 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.

Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

B.2 3. 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.

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.

3. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs

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.

- **B.2 4. Resident Participation and Funding.** In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs 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.
 - **5. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the 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 owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, 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:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - 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. HUD is incorporating 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 PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and 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 PHA (as 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.

- 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.
- For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

B.2 ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

iii. The PHA (as owner) give 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 PHA (as owner) provide an 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.

5. 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 in Section 1.6.C.4; 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.

PBV: Other Miscellaneous Provisions

1. 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. Please see Appendix IV for reporting units in Form HUD-50058.

2. Additional Monitoring Requirement. The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.

Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as "existing housing" under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as "existing housing."

B.2 Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR §983.152(c)(vi) continue to apply.

Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but 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. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 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. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

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

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 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).

To implement this provision, HUD is waiving 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).

5. **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, except with the written approval of HUD to the contrary.

6. **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

B.2 to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. 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.)

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units. After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Other Significant Amendment changes to the LRHA (5) year plan that are in conjunction with the RAD Conversions of Dearington, Birchwood, Brookside and Langview Apartments include:

LRHA will consider CNI Planning Grant opportunities in the next FY for Dearington, Birchwood, Brookside, and Langview. The anticipated grant application submission summer of 2023

□ Mixed Finance Modernization or Development – LRHA intends to begin a strategic planning process with residents, staff, and stakeholders during which a mixed finance and modernization plan will come to fruition. LRHA anticipates entering into a Master Development Agreement with a selected Developer as part of a Request for Proposals process in the spring/summer of 2022.

 \Box Demolition and/or Disposition – LRHA anticipates as part of a strategic planning process to incorporate plans to demo or dispose of PHA properties for mixed finance development. SAC Application process anticipated start date of 4th quarter 2022.

B.2	Project Based Vouchers – LRHA anticipates the publishing of a Request for Qualifications
	(RFQ) for project-based voucher development in FY2023 and FY2024. Qualifications will be
	reviewed on an on-going process and up to 3 or 4 Applications to enter Housing Assistance
	Payments (AHAP) may be awarded by end of FY2023. The Authority will not use more than 20%
	of its Housing Choice Voucher allocation, the location for Project Based Vouchers can be
	anywhere in the City of Lynchburg.

Units with Approved Vacancies for Modernization – LRHA submitted a request for approval for modernization and upgrades of three (3) units as previously anticipated and anticipates the possibility of spending Capital Fund Grant dollars on modernization and upgrades for four (4) additional of its PH units. This request will also be submitted to the Richmond Field Office through PIC.

Other Capital Grant Programs – LRHA will continue to monitor and consider applying for future capital fund grants, since its 2021 application for Emergency Security and Safety Grants was not awarded in 2021, Lynchburg Redevelopment and Housing Authority submitted an Emergency Safety and Security Grant in 2022 to HUD and as of this writing awaiting notification.

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

Under new leadership at the Lynchburg Redevelopment and Housing Authority the Authorities goals and objectives have been changed and will be a <u>"Substantial Deviation" from the (5) Year</u> <u>Plan. The new goals, tasks and progress are as follows:</u>

STRATEGIC GOAL #1 - INCREASE THE SUPPLY AND QUALITY OF AFFORDABLE HOUSING IN THE CITY OF LYNCHBURG

Task 1.1 Conduct a market analysis to determine the incomes that need to be accommodated – ONGOING

Task 1.2 Update/undertake a physical needs assessment of each LRHA housing community – PARTIALLY COMPLETE

Task 1.3 Develop a property master plan that identifies where additional affordable housing will be developed by LRHA – Darlington Masterplan-Complete and Birchwood Masterplan has been started.

Task 1.4 Develop conceptual plans for prospective LRHA property purchases identifying the amount, types and affordability levels of housing proposed to be developed – A single family home was bought in the Darington neighborhood with CDBG funding and may be used for relocation. Task 1.4 is still ONGOING.

B.3	Task 2.2 Develop a LRHA Resident Services Work Plan informed by the identified needs in the Resident Needs Survey – INIATED and ONGOING.
	Task 2.3 Collaborate our approach with agency stakeholders and service providers and support existing providers and organization where possible. – ONGOING
	STRATEGIC GOAL #3 - IMPROVE THE EFFECTIVENESS OF BUSINESS OPERATIONS IN ORDER TO IMPROVE SERVICES TO LRHA CLIENTS AND CUSTOMERS
	Task 3.1 Undertake an update to the Operational and Organizational Assessment conducted in 2017 to include recommendations for improving the organizational structure and operational procedures. – ONGOING
	Task 3.2 Undertake an assessment of existing technology systems to include recommendations for modifications, enhancements to existing systems and/or installation of new systems. – COMPLETE, two (2) new desktop computers were purchased; a new VOIP phone system was installed; and, new agency wide cyber security system was purchased and put in place.
	Task 3.3 Develop and maintain staffing, staff training/board development and succession plans – ONGOING
	Task 3.4 Undertake a review of LRHA's Housing Choice Voucher Program to enhance organizational structure and administration and increasing performance levels. – ONGOING
	Task 3.5 Undertake a review of LRHA's Public Housing Program to enhance organizational structure and administration and increasing performance levels. – INITIATED
	STRATEGIC GOAL #4 - MAXIMIZE THE IMPACT AND COST-EFFECTIVENESS OF OPERATIONS AND ASSETS BY STRENGTHENING FINANCIAL CONDITION, STREAMLINING OPERATIONS, AND BEING GOOD STEWARDS OF THE PUBLIC TRUST TO BEST SERVE LRHA C,LIENTS AND CUSTOMERS.
	Task 4.1 Undertake a financial review of LRHA activities, to include recommendations for improving the financial efficiency of specific operations. – ONGOING
	Task 4.2 Review best practices used by other housing authorities to provide additional sources of revenue. – ONGOING
B.4	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.
	The most recent HUD-approved 5 Year Action Plan (HUD-50075.2) was approved on 4/06/2023) as documented in EPIC.

B.5	Most Recent Fiscal Year Audit.
	(a)Were there any findings in the most recent FY Audit?
	$\begin{array}{cc} Y & N \\ \Box & \boxtimes \end{array}$
	(b) If yes, please describe:
	The Lynchburg Redevelopment and Housing Authority's 2022 Audit was conducted by Rubino and Company, Certified Public Accountants. There were no findings.
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) have comments to the PHA Plan?
	Y N
	(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.
	The Lynchburg Redevelopment and Housing Authority held Resident Meetings on August 4, 2023 to discuss the 2024 Annual Plan and the Capital Fund Grant Program. There have been no comments by the residents.
	(Please see Attachment VA013h01ResMtgSignInSheet)
C.2	Certification by State or Local Officials.
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.
	(Please see Attachment VA013i01SignedConsolidatedPlan)
L	

	C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.	
		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.	
		(Please see Attachment VA013j01SignedFormHUD50077CertificationofCompliance)	
_	C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.	
		(a) Did the public challenge any elements of the Plan?	
		$\begin{array}{cc} Y & N \\ \Box & \boxtimes \end{array}$	
		If yes, include Challenged Elements.	
		(Please see Attachment VA013k01CertifiedNewspaperAdvertisement)	
	C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A Image: Ima	
		(b) If yes, please describe:	
	D	D. Affirmatively Furthering Fair Housing (AFFH).	
	D.1	Affirmatively Furthering Fair Housing (AFFH).	
		Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in 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 furth detail on completing this item.	

The Lynchburg Redevelopment and Housing Authority annually reviews its programs to determine whether they are reaching all eligible population groups. If it finds that the programs are disproportionally serving only some groups and not others, the Lynchburg Redevelopment and Housing Authority takes action to increase housing or social service opportunities for under-served households. The Authority is also in compliance with Executive Order 11063, which requires nondiscrimination and equal opportunity. The rules implementing this Executive Order require that The Lynchburg Redevelopment and Housing Authority maintain demographic data in connection with its programs and take "affirmative action to overcome the effects of prior discrimination" (24 CFR Part 107). Records of the steps required to affirmatively further fair housing, as well as the impacts that were made regarding the same are collected and maintained in a database on an annual basis and is kept in the main office of the Housing Authority. Record keeping for this initiative includes but is not be limited to: race, ethnicity, familial status, and disability status of program participants and prospective participants.

 Fair Housing Goal:

 Describe fair housing strategies and actions to achieve the goal

NOT APPLICABLE AT THIS TIME.