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| 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
- (3) g units and any number of vouchers where the total combined units exceed 550.
- (4) **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.
- (5) **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.
- (6) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (7) **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 Columbia, SC _____ PHA Code: __SC002_____ PHA Type: <input type="checkbox"/> Standard PHA <input checked="" type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>1335</u> Number of Housing Choice Vouchers (HCVs) <u>4464</u> Total Combined Units/Vouchers <u>5799</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input 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><i>Copies of the plan may be obtained at the following:</i> CH Administrative Office: 1917 Harden Street Columbia, SC 29204 Resident and Family Services Center: 2133 Walker Solomon Way Columbia; SC 29204 CH Website: www.columbiahousing.org</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;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>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> </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: | | | | | | | | | | | | | | | | | |
| 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 | | | | | |
| 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 checked="" type="checkbox"/> <input 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 checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input checked="" type="checkbox"/> <input 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><u>Statement of Housing Needs and Strategy for Addressing Housing Needs</u></p> <p>An update has been provided on the status of each waiting list managed by Columbia Housing (See attachment SC002v1a2.0).</p> <p>The agency plans on opening waiting lists for the following during the fiscal year:</p> <ul style="list-style-type: none"> • Public Housing (All Bedroom Sizes) • Lorick Place (PBV) • Four Seasons (Mod Converting to RAD) • Villages of River's Edge (PBV) • Oaks at St Annas • Section 32 Lease Purchase Program <p>The following waiting lists changes are planned for the fiscal year:</p> <ol style="list-style-type: none"> 1) Mod Rehab All remaining Mod Rehab properties will convert to Project Based Vouchers under the RAD program and the Mod Rehab waiting lists will be discontinued. 2) Project Based Vouchers will have property specific waiting lists. <p><u>Financial Resources</u></p> <p>An update of the agency's financial resources is included as an appendix (<i>sc002v1a4.0</i>).</p> <p><u>Rent Determination (Payment Standard Changes, utility allowances, flat rents) (see appendix sc002v1a03)</u></p> <ol style="list-style-type: none"> 1) Payment standards may change based upon the FMR's that are released by HUD. | | | | | |

- 2) Payment Standards - Columbia Housing will continue to utilize waivers received under PIH2022-30 authorizing Housing Choice Voucher payment standards at 120% of the published fair market rent and an increase in payment standards during the HAP contract term.
- 3) Utility Allowances - Columbia Housing will utilize property specific utility allowances for all project-based voucher projects and will contract with a third party for the analysis. The utility allowance schedule will be updated based upon completion of the study.
- 4) Flat Rents – CH established flat rents that are based on comparable to standards not less than 80% of the Fair Market Rents.:
 - HCV Rent reasonableness study.
 - Guidelines found in PIH 2017-23 in determining PH Flat Rent Schedule
 - Survey of similar unassisted units in the neighborhood

Deconcentration and Other Policies Governing Eligibility, Selection and Admissions (see appendix sc002v1a05)

Columbia Housing conducted an analysis of the policies that govern eligibility, selection and admissions to the PH and HCV Programs. There were several policy changes during FY 24 and proposed changes for FY25.

POLICY CHANGES APPLICABLE TO THE PUBLIC HOUSING PROGRAM ONLY

Public Housing Waiting List

- During the 24-25 fiscal year, the 30-day advance notice to open the Public Housing Waiting List will be removed.

Section 103: Public Housing Income Limit

- *Public Housing Income Limitation:* Continued program participation limits for families exceeding the statutory income limitation in the Public Housing program, also known as the “over-income” provision will be effective June 14, 2023.
- *Over Income Limit* – The over income limit is established by multiplying the very low-income limit by a factor of 2.4.
- *Non-Public Housing Over Income Family:* A family whose income exceeds the over income limit for 24 consecutive months.
- *Alternate Non-Public Housing Rent:* Columbia Housing will adopt the Section 8 Fair Market Rent as the Public Housing Alternate Rent.
- *Notification to Over-Income Families* – If a family is over-income at a regular recertification of income, Columbia Housing will notify the family that they are over-income and exceeding income limits for 24 consecutive months will result in conversion to a Non-Public Housing Over Income Family (NPOIF) and payment of the alternate Non-Public Housing Rent. Columbia Housing will not terminate tenancy.
 - A second recertification will be conducted at 12 months and the family if the family continues to be over-income, the family will be notified that if they continue to be over-income for an additional 12 months (24 consecutive months) they will convert to a NPOIF and pay the alternate Non-Public Housing Rent.
 - The family may request an interim recertification at any time during the 24-month period and if the recertification results in a decrease in income so that they no longer are over-income they will remain an eligible Public Housing Family.
 - An Interim recertification will be conducted if requested by the family within 6 months prior to the conversion to a NPOIF.
 - The family shall be entitled to a hearing if the dispute the over-income determination.
 - Upon notification of the conversion to a Non-Public Housing Over Income Family, Columbia Housing

will provide the family with a new lease. The family must sign the new lease within 60 days from offer; failure to sign the new lease will result in termination of tenancy.

POLICY CHANGES APPLICABLE TO THE HOUSING CHOICE VOUCHER PROGRAM ONLY

Project Based Vouchers for Section 32 Lease Purchase Units

- 5) Columbia Housing is proposing to convert public housing single family homes through the Section 32 Lease Purchase Program. The homes will have PBVs attached that will have the option to be converted to a HCV Homeownership Voucher.

Section 3.4 of the Housing Choice Voucher Program has been revised as noted below.

The attached Chapter 25 has been added to the HCV Administrative Plan for the Rental Assistance Demonstration Program.

3.4 Local Preference(s)

CHA will use local preferences as detailed below.

CHA will accept applications from local preference applicants even when the waiting list may otherwise be closed. Applicants with local preferences will not be required to complete the on-line registration but will be placed directly on the waiting list in order of approval by CHA. The following local preferences will be applied in order as listed.

Section 3.4 of the Admin Plan, Local Preferences is changed as follows:

- **Public Housing RAD Conversion** – Residents in “good standing” at a CHA public housing community that is approved for a RAD conversion under an early relocation approval or upon receipt of a RAD Conversion Commitment (RCC)
- **Public Housing Uninhabitable; Demolition; or Disposition** – Residents in “good standing” at a CHA public housing community residing in a unit that is deemed uninhabitable and repairs cannot be made in a reasonable period of time, or who reside in a public housing unit on the date the unit was approved by HUD to be disposed or demolished under a Section 18 or other HUD approved action.
- **Public Housing Over/Under Housed Families** – Residents in “good standing” at a CHA public housing community or a CHA sponsored mixed finance community who are over-housed or under-housed and no appropriate size housing unit exists to house the family.
- **Tenants in Mod Rehab or Projects Approved for PBV** – Tenants that are in “good standing” at an existing Mod Rehab Project converting to RAD or opting out of the Mod Rehab Program or an existing or rehabilitation project approved by CHA pursuant to a solicitation for Project Based Vouchers.

POLICY CHANGES FOR PUBLIC HOUSING AND HOUSING CHOICE VOUCHER PROGRAM

Columbia Housing will amend the Public Housing Admissions and Occupancy Policy and the Housing Choice Voucher Administrative Plan to adopt all provisions of the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) effective **January 1, 2024**.

Section 102: Income Reviews

- ***Interim Recertifications:*** A 10% adjusted income increase/decrease threshold will be used for conducting interim recertifications and increases in earned income will not be processed until the next Annual Recertification.
 - ***Income Decrease*** - Columbia Housing will not conduct an interim recertification if the family’s adjusted income decreases by an amount that is less than 10% of the family’s annual adjusted income.
 - ***Income Increase*** – Columbia Housing will not conduct an interim recertification if the family’s earned income has increased. Columbia Housing will conduct an interim recertification if the family’s annual adjusted income has increased by more than 10% from other sources of income.
 - ***Three Month Period*** - Columbia Housing will not conduct any interim recertifications if the request

for an interim is within 3 months of the family's regularly scheduled recertification.

- Streamlined Verifications: Several provisions will streamline the verification process include:
 - Adults Only Need to Sign Consent Form Once: The required consent form that all adult household members sign will be signed only once instead of annually.
 - Use of Income Determinations from Other Programs: Use income determinations made under other federal benefits programs for recertifications.
 - Review of EIV Not Required at Interim Recertification: Eliminate the requirement to use EIV to verify tenant employment and income information during an interim recertification.
- Increased Standard Deduction for Elderly/Disabled Households: Standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability is increased from \$400 to \$525 adjusted by HUD annually.
- Additional Income Exclusions: Additional income and asset exclusions, including:
 - Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home.
 - Veterans' aide and attendant care
 - Distributions of principal from non-revocable trusts, including Special Needs Trusts.
- Threshold for Claiming Medical/Disability Expenses Increased: Increased allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.
 - Hardship Relief: Grants hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

Eligibility for Relief - To receive hardship relief the family must have received a deduction from annual income because their sum of expenses exceeded 3% of annual income as of January 1, 2024.

Form of Relief - The family will receive a deduction for the total sum of eligible expenses that exceed 5% of annual income; 12 months after relief family must receive deduction totaling 7.5% of annual income; 24 months after relief family must receive deduction totaling 10% of annual income.

- Higher Threshold for Imputing Asset Income: Raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

SECTION 104: ASSET LIMITS

- Asset Limitation: A \$100,000 asset limit for eligibility and continued assistance. Families are ineligible for assistance if assets exceed this limit or if they own real property suitable for occupancy. Columbia Housing will delay enforcement/termination for up to six months if the family is over the asset threshold at the time of annual recertification.
- Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset.
- Self-Certification of Assets under \$50,000: Self-certification of net assets will be used if estimated to be at or below \$50,000.

OTHER

- Streamlined Recertifications for Fixed Income Households - Columbia Housing will implement streamlined requirements for verifying and adjusting fixed income sources over a three-year cycle for families with an unadjusted income consisting of 90 percent or more from fixed income sources. In the initial year of a three-year cycle, CH will complete an annual income determination consistent with all applicable HUD regulations and guidance. In the second and third year of the three-year cycle, CH will obtain from the family a certification that their fixed income sources have not changed, and that the family's income is still made of at least 90 percent from fixed income sources. If the family provides that certification in years two and three, CH will adjust the family's fixed income sources by the Cost of Living Adjustment (COLA) that is applicable to that fixed income source instead of fully reverifying and recalculating the income source. CH will provide a reexamination of non-fixed incomes sources, if applicable by applying the same inflation factor.
- Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually by HUD, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance.

OPERATIONS AND MANAGEMENT

Columbia Housing does not propose any leadership operations and management changes during the fiscal year 24-25.

- 1) The Chief Executive Officer (CEO) directs day-to-day management and operations of the Housing Authority with assistance of the following senior management staff:
 - Senior Vice President of Operations (COO)
 - Chief of Development
 - Senior Vice President of Communications
 - Chief Financial Officer
 - Senior Vice President of Resident and Strategic Initiatives
 - Senior Vice President of Property management and Maintenance
 - Housing District Manager
 - Vice President of Housing Choice Voucher
 - Vice President of Human Resources
 - Vice President of IT
 - Chief of Staff
 - Chief of Police
 - CH Cares Coordinator
- 2) All property management staff will receive certifications for RAD/PBV Specialists and Tax Credit.
- 3) As result of RAD conversions, CH will be transitioning from public housing wait list to a site-based wait list.

Homeownership Programs (HCV Homeownership changes and Public Housing Purchase Options)

Columbia Housing applied to HUD to become a HUD Certified Housing Counseling Agency. The application is still under review for approval.

Columbia Housing intends to dispose of over 200 single family homes under the Public Housing Section 18 scattered site program and convert these units to a Section 32 Lease Purchase Homeownership Program. The homeownership program will include a lease purchase program in which prospective homebuyers may lease the unit for up to three years while preparing to purchase the home. Each home will have a PBV attached during the leasing period that can be converted to a HCV Homeownership Voucher.

HUD PROGRAMS UNDER PHA MANAGEMENT

| Program Name | Units or Families Served at Beginning of FY | Expected Turnover |
|--|--|---|
| Public Housing | 1452 | 250 |
| Housing Voucher Vouchers | 3786 | 220 |
| Section 8 Certificates | N/A | N/A |
| Section 8 Mod Rehab | 39 | All Mod Rehab will be converted under RAD |
| Special Purpose Section 8 Certificate Vouchers | N/A | N/A |
| Emergency Housing Vouchers | 83 | 5 |
| VASH | 376 | 99 |
| Mainstream | 24 | 5 |
| HCV HOPWA | 60 | 5 |
| Housing First HOPWA | 15 | 2 |
| Permanent Housing HOPWA | 9 | 1 |
| Project Based Vouchers | 233 | 3 |
| HCV Homeownership | 72 | 0 |

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|--|----|---|
| Continuum of Care Permanent Supportive Housing | 58 | 6 |
|--|----|---|

Homeownership Programs

Housing Choice Voucher/Section 8

Columbia Housing administers a Housing Choice Voucher Homeownership Program.
Program Description:

- The number of participants will not be limited.
- The PHA does have an eligibility criterion for participation in the Section 8 Homeownership Program in addition to HUD criteria. (See HCV Homeownership Plan)
- Proposed HCV Homeownership Amendment to use PBVs that convert to Homeownership Vouchers for units under the Section 32 Lease Purchase Program.

Community and Self-Sufficiency Programs

Pursuant to the FSS Final Rule and New 24 CFR Part 984 Columbia Housing revised the FSS Action Plan in accordance with HUD’s regulatory changes for the program. The Plan was approved by the Board of Commissioners and HUD prior to the November 14, 2022, deadline.

Coordination with the Welfare (TANF) Agency

Coordination efforts between the PHA and TANF agency include:

- Client referrals
- Information sharing regarding mutual clients for rent determination.
- Coordination of the provision of specific social and self-sufficiency services and programs to eligible families

Services and Programs Offered to Residents by Columbia Housing

| Program Name | Size | Allocation Method (waiting list/random selection/specific criteria) | Access Development Office/Other) | (Eligibility) |
|--------------------------------------|------|---|-------------------------------------|------------------------|
| Housing Choice Voucher Homeownership | 72 | Specific Criteria | Resident and Family Services Center | Housing Choice Voucher |

Family Self-Sufficiency

| Program | Required Number of Participants | Actual Number of Participants (Numbers as of (2.8.2024)) |
|------------------------------------|---------------------------------|--|
| Public Housing | 65 | 46 |
| Housing Choice Voucher (Section 8) | 49 | 56 |

Welfare Benefits Reduction

The PHA is complying with the statutory requirements of section 12(d) o the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff on them
- Informing residents of new policy on admissions and reexamination
- Actively notifying residents of new policy at times in addition to admission and reexamination

- Establishing or pursuing a cooperative agreement with all appropriate TANF agency regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies

Community Service

- a) Number of tenants required to perform community service - 243
- b) Number of tenants performing community service - 96
- c) Number of tenants granted exemptions - 1441
- d) Number of tenants in non-compliance - 12
- e) Number of tenants evicted/terminated due to non-compliance - 0

Pet Policy

The current Pet Policy changes were effective September 15, 2022. (Resolution 2022-042). There are no current or proposed changes to the Pet Policy.

Asset Management

Columbia Housing’s asset management functions concerning its public housing inventory including the long-term operations, capital investments, rehabilitation, modernization, disposition and/or demolition are detailed in its Vision 2030 plan. Please see the exhibits for a detailed explanation of the Vision 2030 work activities and schedule.

Crime and Safety

There have not been any changes to Columbia Housing’s Crime and Safety Plan. The agency continues to employ a team to provide security monitoring within our communities and works with local law enforcement for additional support to strengthen our capacity.

Significant Amendment/Modification Definition: (No change from previous year)

- Any change with regard to a proposed public housing Section 18 action; and
- Any change to rent or admissions policies or organization of the waiting list

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; and
- Changes to the financing structure for each approved RAD conversion.

Standard Deviation: (No change from previous year)

- Additions and deletions of Strategic Goals
- Any deviation that requires review and input of the Resident Advisory Board as well as Board of Commissioners Approval.

(c) The PHA must submit its Deconcentration Policy for Field Office review. **(See appendix sc002v1a05).**

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

Columbia Housing performed an annual deconcentration and income mixing analysis to determine if the public housing developments follow the Deconcentration Policy. The PHA does have general occupancy public housing developments covered by the deconcentration rule. The covered development indicated below has an average income that falls outside of the Established Income Range.

Deconcentration Policy for Covered Developments

| Development Name | Number of Units | Explanation (if any) {step 4 at 24 CFR 903.2©(1)(iv)} | Deconcentration policy (if no explanation) {see step 5 at 24 CFR 903.2©(1)(v)} |
|------------------|-----------------|--|--|
| AMP 1 | 161 | The covered development's size, location and income configuration promote income Deconcentration such as a scattered site or small developments. | See Policy |
| AMP 2 | 1460 | The covered development's size, location and income configuration promote income Deconcentration such as a scattered site or small developments. | See Policy |
| AMP 3 | 363 | Average within range | |
| AMP 4 | 345 | Average within range | |
| AMP 5 | 186 | Average within range | |

B.2 New Activities.

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- 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).

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

In 2021, Columbia Housing launched our *Vison 2030* Plan. *Vision 2030* is the culmination of almost two years of planning in which every Public Housing property has been thoroughly assessed by third party professionals including architects, engineers, appraisers, and environmental consultants. This assessment identified that Columbia's Public Housing has capital needs of over \$250 Million. *Vision 2030* is the strategic framework through which Columbia Housing will reposition our Public Housing portfolio and create new affordable housing in the City of Columbia and throughout Richland County through the creation of public/private partnerships utilizing private capital.

Public Housing is statutorily prohibited from accessing private capital, but repositioning tools provide by HUD, including the **Rental Assistance Demonstration (RAD) Program** removes properties from the Public Housing Program to enable access to market debt and equity. *Vision 2030* will result in the elimination of all Public Housing in the City of Columbia and transition to another affordable housing platform.

Columbia Housing will use a variety of HUD available tools to reposition the Public Housing portfolio including the Rental Assistance Demonstration Program, Section 18 Demolition and Disposition; and Section 18 Scattered Sites.

The attached charts detail the repositioning strategy for each public housing property and the anticipated status during the 2024 Agency Plan year.

Demo/Disposition (See appendix sc002v1a07)

Columbia Housing intends to dispose of 200 single family homes under the Public Housing Section 18 scattered site program and convert these units to a homeownership program.

Conversion of Public Housing to Tenant Based Assistance

The charts in this plan identify units to be converted under the RAD program. The RAD conversion will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. Changes in bedroom distribution will be made to accommodate actual needs of all current residents assuring that all households can be rightsized.
3. Most properties will utilize a RAD/Section 18 Blend to maximize potential revenue to reach the necessary rehab level.
4. There will be transfer of assistance under the RAD conversion.

Mandatory Conversions

Columbia Housing does not have any properties designated for mandatory conversions.

Voluntary Conversions

Columbia Housing certifies that we have reviewed each covered development's operations as public housing, considered the implications of converting to tenant-based assistance and concluded that the conversion of the development may be appropriate because removal of the development would meet the necessary conditions for voluntary conversions.

When the Public Housing portfolio reaches less than 250 units, the remaining units will exit the program through voluntary conversion.

Rental Assistance Demonstration (See RAD appendix sc002v1a08, sc002va09 and sc002va10, sc002v1a11 and sc002v1a12).

Columbia Housing intends to submit an application to convert various Public Housing communities to Project Based Vouchers under 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 1.6 of PIH Notice 2019-23, REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are included in the RAD Plan. Additionally, Columbia Housing 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 CHA 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 CHA may also borrow funds to address their capital needs. CHA will also contribute Replacement Housing Factor (RHF) funds and Public Housing Reserve funds in the amount of approximately \$3 million dollars.

Occupancy by Over-Income Families

Significant Amendment to the PHA Plan: Public Housing Income Limit Section 103 of the Housing Through Modernization Act of 2016 (HOTMA) amends section 16(a) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a) to place an income limitation on public housing tenancy for families. The law requires the PHA to terminate assistance of over-income families.

After a family's income has exceeded 120% of the area median income (AMI) (or a different limitation established by the Secretary) for two consecutive years, the PHA must terminate the family's tenancy within 6 months of the second income determination or charge the family a monthly rent equal to the greater of (1) the applicable Fair Market Rent, or (2) the amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations

Project Based Vouchers

Columbia Housing will allocate Project Based Voucher to assist with the repositioning efforts identified herein. The overall repositioning strategy will result in the net loss of Public Housing Units. These units will be replaced at new construction projects located on sites throughout the City and not on former Public Housing Site.

The outline of the repositioning plan for CH's properties to include RAD, Demo/Dispo and Section 18 Scattered Sites is included in appendix (sc002 v1 a9.0).

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.

2020-2025 Strategic Goals

I. Public Housing: Develop and implement repositioning strategies for all public housing properties.

2024 Update: Columbia Housing has a diverse repositioning strategy for transitioning the public housing portfolio. Over the past fiscal year, we have made significant strides in formalizing our VISION 2030 Plan, obtaining appropriate Board of Commissioners approvals, developing public/private partnerships, and obtaining private capital to reposition our public housing with HUD's repositioning tool to include the Rental Assistance Demonstration Program (RAD).

II. Housing Choice Voucher Program: Maximize leasing capacity based on annual budget authority. Maintain program compliance, in accordance with HUD regulations.

2024 Update: For CY ending 12/31/2023, CH exceeded funding available resulting in over 100% utilization of the Annual Budget Authority. We anticipate continuing to lease the program in a manner to use all funding and/or vouchers allocated to the agency.

III. Development and Capital Assets: Support repositioning of the existing portfolio through recapitalization, conversion, and preservation.

2024 Update: See VISION 2030 Plan in the exhibits RAD Project status 2024 and PH Repositioning Projects 2024.

IV. Resident Strategies: Strengthen relations with the people we serve by increasing mutual accountability and by improving our ability to connect them to vital services in the community that will foster economic self-sufficiency and quality of life opportunities.

2024 Update: Columbia Housing created new partnerships to bring resources to our community members that will foster economic self-sufficiency and quality of life opportunities. The new partnerships provide resources in the areas of employment services, financial literacy, youth programming, senior services, and health and wellness. Some of our partnerships consists of:

- Fostering Economic Self Sufficiency and Quality of Life Opportunities, by expanding and creating 30 new partnerships.
 - Midlands Technical College new enrollees,
 - SC Department of Health and Environmental Control (DHEC)
 - Managed Care Organizations (Humana, Absolute Total Care, etc.)
 - Prisma Health,
 - Senior Resources, and more..
 - Opportunities for Youth, Adults, and Seniors Include:
 - 80 Seniors participated in “Seniors On The Go” Trips to include fishing, circus, dining, zoo visits, Veterans Day Parade and Riverwalk.
 - 3 Public Housing residents received scholarships for college,
 - 22 Summer Youth Employment Opportunities,
 - 50 youth participated in Carolina Care 4 Kids Program held in partnership with USC School of Pharmacy,
 - Hosted summer feeding in two of our largest public housing sites,
 - \$52,013.00 Gen Z Grant Prep Grant for Year 2,
 - 114 youth participate in Gen Z Program,
 - 136 seniors receive monthly in-home health services,
 - 154 participants in the ROSS Program,
 - 52 participants in ROSS Initiatives – HEELS, TIES, and PEARLS,
 - Awarded \$114,819.00 for the Family Self Sufficiency Program,
 - 102 Participants (Public Housing & Housing Choice Voucher programs) with escrow balances totaling \$313,387.00,
 - 3 FSS Program graduates since beginning of the fiscal year.

V. Homeless Programs: Expand our collaborative partnerships with county and citywide efforts to reduce families at risk of experiencing homelessness or at risk of losing housing.

2024 Update: Columbia Housing continues to address the issue of chronic homelessness in the area by administering special programs that target the unhoused with disabilities and others at risk of being homeless.

- The 84 Emergency Housing Vouchers (EHV) allocated to CH are fully leased and provide stable housing for individuals and families who were homeless, at risk of being homeless or fleeing domestic violence.
- CH was awarded \$840,255.00 in CoC funds from the U.S. Dept of Housing and Urban Development for the 2023-2024 funding year to provide housing for 58 chronically homeless disabled households.
- CH was a recipient of \$157,547.00 in allocation of CDBG funds from the City of Columbia for the Housing First HOPWA Program to provide housing for 15 households with a member who was diagnosed with HIV/AIDS related illness who are homeless.

VI. Homeownership: Create opportunities for residents and program participants through the coordination of homebuyer education, resources and activities that increase homeownership opportunities.

2024 Update: Columbia Housing's Homeownership Program continues to be thriving program that serves many individuals and families with becoming homeowners.

- 2 HCV families purchased homes since the beginning of the fiscal year.
- 72 current participants are active in the HCV Homeownership Program
- 9 graduated from the HCV Homeownership Program and are now paying their own mortgage without any assistance.
- The application to become a HUD Certified Housing Counseling Agency has been submitted and is awaiting final approval.

VII. Human Resources and Personnel Development: Embrace the agency's new identity by transforming its organizational structure and culture through establishment of a track record for integrity, accountability, collaboration, and exceptional customer service.

2024 Update: CH has an established employee performance evaluation process. With this process, we ensured that each employee receives their performance evaluation from their supervisor and an interactive process happens where constructive feedback is given to each employee, commending them on things they've done well, and encouraging them in areas where they need improvement.

- Developed and coordinated a Health and Resources fair for CH employees and the community. The fair included exhibitors to discuss health, wellness, credit scores, finances, etc.
- Established an electronic tool to capture employee's answers to the annual completion of the Conflict-of-Interest policy.
- Assisted employees with learning to do their own health and retirement benefits online, including adding/changing a beneficiary and doing deferred compensation.
- Hosted a SC Deferred Comp seminar facilitated by an Empower representative to assist employees with decisions about 401k and retirement.
- Established an electronic tool to capture information for employees that have secondary employment.

- Incorporated an area in the ADP Personnel Management system to capture an employee's use of family medical leave act leave.
- Established a "Just Checking in... How is it going?" process to check in with new employees after a few months with CH.
- Established a tool to capture work of employees who have been approved to work from home via the Extenuating Medical Circumstances process. This assists the supervisor in knowing the work that has been completed, so they can better direct the employee on what needs to be done.
- Serves as the proctor for Nan McKay testing of employees.
- Established a process that enables employees to clock in and out only from their workstation.
- Facilitated "Effective Performance Management" training for supervisors to assist them with completing the performance evaluations.
- Sent weekly emails to supervisors that did not complete the performance review.
- Updated the electronic performance evaluation process by including the employee self-evaluation.
- Updated orientation to include pictures of Executive Staff, so that new employees can become familiar with them.
- CH established an employee performance evaluation process to ensure that each employee receives their performance evaluation through an interactive process with constructive feedback.
- The performance evaluation system has been transformed into an electronic system through ADP WFN page. The entire process can be done, from start to finish, through all supervisory chain of commands, including electronic signature, via the ADP WFN system.
- All personnel actions, including new hires, promotions, demotions, reassignments, suspensions are captured via our Personnel Action Request (PAR) process. Each action must be reviewed and signed by the CEO before processed.
- Rolled out two CH personnel policies – the Alternative Work Schedule and Sick Leave Pool policies.
- We've developed a training database system to capture training that employees have taken.

VIII. Community Safety and Security: Develop a comprehensive strategy through the engagement of Columbia Housing's communities and law enforcement agencies that can improve public safety and the quality of life within its communities.

2024 Update: CH Security team created a comprehensive strategy to establish residents as first responders, reduce their vulnerability through awareness tools, provided educational opportunities for residents to engage with law enforcement and engaged partnerships that teach awareness and address resident safety concerns and more. Some of our special initiatives are as follows:

- National Night Out – An annual event that is designed to introduce the local first responders to the community. It will allow the community and first responders to interact and develop positive relationships.
- Fire Safety and Prevention Program – A quarterly meeting to engage residents through fire safety drills and teach them the importance of protecting their communities from injuries, deaths, and property damage resulting from fires.

- Residents Task Force Meetings – A monthly meeting of the Resident Executive Council, local law enforcement and resident safety staff to discuss resident safety concerns, crime prevention measures, and community reports.
- Neighborhood Associations – Participated in several community sweeps in the Linc-Co-Lat Community that surrounds two of our large apartment complexes: Latimer Manor and Lorick Place. Additionally, Columbia Housing’s Security Team participated in several community giveaways with the Linc-Co-Lat Neighborhood Association.

IX. IT Operations: Innovate the way Columbia Housing maintains a smooth functioning of its infrastructure and operational environments that support application deployment to its internal and external customers (i.e. residents and families).

2024 Update: In order to maintain functional infrastructure and operational environments, the agency’s IT department is focusing on the security of employees that will ensure our internal and external customers have the best experience through the following measures:

- To maintain functional infrastructure and operational environments, we increased IT functionality by implementing print anywhere capabilities to our copier fleet which allows employees to print their documents from any copier with their ID badge.
- Another way the IT Department increased functionality as well as cost savings was by switching mobile phone carriers to ATT FirstNet.
- The IT department also made strides with security by developing and implementing an internal IT Security SOP which outlines strategies for keeping employee data, and the data of those that we serve, safe. These implementations, along with our daily monitoring of hardware and diligent rollout of software updates and will ensure that our internal and external customers have the best experience.

X. Communications and Community Engagement: Build support for housing as a key component of vibrant, sustainable communities through the communication of public information, engagement and advocacy that promotes affordable housing and supports the advancement of low wealth individuals and families.

2024 Update: Columbia Housing has taken on communications and community engagement as one of our major initiatives to educate our residents, partners, and the public on the many programs, opportunities, and successes of the agency. Some of the activities undertaken to address this goal are:

- THIS is Columbia Housing Bi-weekly Digital Newsletter—Columbia Housing created a colorful, exciting, visually appealing bi-weekly publication to highlight resident success stories, engaging resident- program offerings, community resources and community engagement/volunteer opportunities for residents. Hard copies are available for all senior high-rises and by request at other properties.
- Power of Partnerships Media Series--Columbia Housing has increased its community partnerships by 25% over last year. The agency often holds media and community events to highlight key partnerships. For example, the agency’s official ‘Signing of the Memorandum of Understanding’ events publicly announce key partnerships and detail the benefit of those partnerships to agency residents.
- Zooming to the Polls Virtual Townhalls--Columbia Housing hosts a reoccurring series of online Virtual Townhall Meetings on the ZOOM platform for residents and the community at-large ahead of key local, state, and national elections. The agency brings political candidates, election commission officials, and other voting advocates together to talk about the importance of upcoming elections and the participation of Columbia

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| | <p>Housing residents in those elections. The outcome was a more than 20% increase in voter participation among Public Housing residents when the program initially launched.</p> <ul style="list-style-type: none"> • Social Media Short Video Series--Columbia Housing has found success in featuring its Chief Executive Officer in a series of short videos to address important issues in the community. This gives the leadership at the agency an opportunity to directly communicate with its residents and the community at-large, at will. So, whether it's the opening of a waiting list, or increasing the pool of available landlords - these 2-minute videos have been extremely successful in moving residents and the community to action. • Regular eBlasts to Columbia Housing's 40K+-member Subscriber Database-Through its interactive website, Columbia Housing can immediately and directly communicate with its Public Housing & Housing Choice Voucher recipients, community leaders, elected officials, community-based organizations, partners, and the media. These efforts have proved extremely successful in moving audiences to action and keeping them informed of important agency and community news. • Nontraditional Media Partnerships—Columbia Housing maintains working partnerships with two grassroots print publications. With these publications, we have flexibility to routinely publish community news to individuals who might not get their news and information through traditional/mainstream media sources. The Carolina Panorama and The Free Times provide tremendous editorial flexibility to reach grassroots audiences. • Social Media Platforms—Columbia Housing routinely publishes short stories, graphics, etc via social media to engage its nearly 5,000 followers. • In addition, Columbia Housing maintains good professional working relationships with all local, statewide, and regional media outlets. <p>XI. Violence Against Women (VAWA): Enforce and protect the rights of victims of domestic violence, dating violence, and stalking to secure and maintain housing without being victimized a second time by being denied housing or losing housing because of the criminally violent acts perpetrated against them.</p> <p><i>2024 Update:</i></p> <ul style="list-style-type: none"> • Developed a Board Approved revised the VAWA Policy to be compliant with new regulations. • Continued to ensure that residents who are victims of domestic violence, rape, stalking, dating violence receive the proper services that will allow them to stay safe and remain housed through transfers to other communities when necessary. • Partnered with local advocate groups to provide information to residents on safety measures. |
| <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>The Capital Fund Program 5-Year Action Plan was approved by HUD on 9.15.2023.</p> |
| <p>B.5</p> | <p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe: There were no findings during the FY 22 audit conducted by Cohn Reznik</p> |

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| C. Other Document and/or Certification Requirements. | |
| C.1 | <p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>The RAB Meetings will be held on March 19, 2024.</p> |
| C.2 | <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, 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.</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>The public hearing will be held virtually and in-person on March 28th at noon.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input 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?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Columbia Housing was designated as a troubled PHA on November 8, 2023. Since receiving the designation, a comprehensive recovery plan was submitted to HUD detailing our repositioning and maintenance plans to address issues that impacted the PHAS Score.</p> |
| 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 an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal.

Continue affirmative measures to ensure access to suitable living environment regardless of race, color, national origin, religion, sex, familiar status and disability.

- Policies are reviewed annually to ensure that practices are not in place that violate Fair Housing regulations.
- Residents are provided information on their rights under Fair Housing during initial lease-up.
- The CH Cares Coordinator handles resident complaints, hearings, and manages other issues and concerns brought forward by residents.
- CH ensures that team members participate in fair housing training annually.
- Standard Operating Procedures for Grievance Hearings were developed to ensure that residents are prepared and have a fair hearing process.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal.

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.