

STATEMENT OF HOUSING NEEDS

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <=30% of AMI	6,370	3	3	3	3	3	3
Income >30% but<=50% of AMI	4,715	4	4	3	3	3	3
Income >50% but<80% of AMI	5,970	3	4	4	3	3	4
Elderly	1,790	4	5	4	3	2	4
Families with Disabilities	3,500	3	4	3	3	3	3
Race/Ethnicity *1	9,860	4	4	3	3	3	4
Race/Ethnicity *2	5,710	3	4	3	3	3	3
Race/Ethnicity *3	1,075	3	3	3	3	2	4
Race/Ethnicity							

***1 – White/Non-Hispanic**

***2 – Black/Non-Hispanic**

***3 – Hispanic**

The following sources of information were used by the PHA to conduct this analysis:

- ACS data – 2015-2020
- IPUMS ACS data 2015-2020

B. Housing Needs of Families on the 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 development/sub-jurisdiction)

	# of families	% of total families	Annual Turnover
Waiting List Total	1144	N/A	16%
Extremely Low Income <= 30% AMI	698	61%	N/A
Very Low Income (<30% but <=50% AMI)	133	12%	N/A
Low Income (>50% but <80% AMI)	58	5%	N/A
Families with children	395	35%	N/A
Elderly Families	66	6%	N/A
Families with Disabilities	145	13%	N/A
Race/ethnicity *1	224	20%	N/A
Race/ethnicity *2	658	58%	N/A
Race/ethnicity *3	15	1%	N/A

***1 = White/Non-Hispanic**

***2 = Black/Non-Hispanic**

***3 = Hispanic**

In accordance with the agency's Administrative Plan, the application process is opened upon determination that the eligible pool of applicants on the Waiting List have been served. Applications were accepted during the month of June 2021. Eligible families are notified by time and date of application as funding becomes available to support issuance of a Voucher. Applications are accepted for project-based units at Charles Road, Kings Row and Vista Grand, upon determination that there are no interested applicants on the current Waiting List (elderly and/or disabled families receive a local preference).

C. Strategies for Addressing Needs

Need: Shortage of affordable housing for all eligible populations

Strategy 1: Maximum the number of affordable units available to the PHA within its current resources by:

- Maintain or increase HCV lease-up rate by maintaining payment standards that will enable families to rent throughout the jurisdiction.
- Undertake measures to ensure access to affordable housing among families assisted by the PHA regardless of unit size required.
- Maintain or increase HCV lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration.
- Maintain or increase HCV lease-up rates by effectively screening applicants to increase owner acceptance of program.
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

Strategy 2: Increase the number of affordable housing units by:

- Apply for additional HCV units should they become available.
- Leverage affordable housing resources in the community through the creation of mix-finance housing.
- Collaborate with local governments, private developers and non-profits to promote development of new affordable housing stock.

Need: Specific Family Types – Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30% of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in HCV housing.
- Promote Family Self-Sufficiency programs to support and encourage work.
- Maximize turnover of exception units in project-based assistance that affords educational and training opportunities for low-income families.

Need: Specific Family Types – Families at or below 50% of AMI

Strategy 1: Target available assistance to families at or below 50% of AMI

- Promote Family Self-Sufficiency programs to support and encourage improvement in education, job skills and success in achieving a higher level of employment.
- Promote the Homeownership Program through pre-homeownership counseling and related training.

Need: Specific Family Types – The Elderly

Strategy 1: Target available assistance to the elderly:

- Apply for vouchers specifically allocated for the elderly population should they become available.
- Partner with area non-profits and/or private developers to provide quality affordable elderly housing by committing Housing Choice Vouchers through project-based set asides.

Need: Specific Family Types – Families with Disabilities

Strategy 1: Target available assistance to families with disabilities:

- Apply for special-purpose vouchers targeted for families with disabilities when available.
- Affirmatively market the program with local non-profit and/or private developers to provide affordable housing for families with disabilities by attaching Housing Choice Vouchers through project-based set asides.
- Make reasonable adjustments to rules, policies, practices and procedures to ensure that participants with a disability have equal opportunity to use and enjoy a housing unit.

Need: Specific Family Types – Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

- Affirmatively market to races/ethnicities show to have disproportionate housing needs.
- Participate in outreach efforts conducted by schools, grassroots and faith-based organizations, community groups and groups working with various races and ethnicities.
- Promote collaboration with local service providers (Departments of Social Services, Health Departments, United Way, Salvation Army, homeless shelters, etc) for distribution of information pertaining to housing options provided by the PHA.

Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel HCV tenants as to location of units outside of poverty, minority concentration or high crime areas and assist them in locating those units.
- Market the HCV program to owners outside of areas of poverty, minority concentrations and high crime areas.
- Utilize project-based vouchers to encourage new construction of quality affordable housing in areas traditionally not available to families served by the HCV program.

Other Housing Needs & Strategies

The following factors have influenced the PHA's selection of strategies it will pursue:

- Funding constraints;
- Staffing constraints;
- Limited availability of sites for quality affordable housing;
- Extent to which particular housing needs are met by other organizations in the community;
- 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;
- Resistance to development of "affordable housing" (not in my back yard)
- Results of consultation with local or state governments;
- Results of consultation with Section 8 families and the Tenant Advisory Board;
- Results of consultation with advocacy groups.

PHA POLICIES GOVERNING ELIGIBILITY, SELECTION AND ADMISSIONS

- A. Public Housing – N/A
- B. Housing Choice Voucher (HCV) Program (Section 8)

(1) Eligibility

- a. What is the extent of screening conducted by the PHA?
 - Criminal or drug related activity only to the extent required by law or regulation.
 - Search of the Dru Sjodin National Sex Offender database to ensure that member of applicant household is not a registered sex offender.
- b. The PHA requests criminal records from local law enforcement agencies for screening purposes.
- c. The PHA obtains a national criminal report if applicant/participant has not lived within the four-county jurisdiction for the past three years or as deemed appropriate by PHA staff.
- d. The PHA may request criminal records from State law enforcement agencies when needed to determine eligibility for admissions and/or continued housing assistance.
- e. The PHA does not access FBI criminal records from the FBI for screening purposes.
- f. The PHA shares the following information with prospective landlords:
 - Criminal or drug related activity
 - Names and addresses of prior landlords
 - Any known history of tenant damages
 - Any known history of tenant lease violations

(2) Waiting List Organization

- a. The HCV tenant-based assistance waiting list is not merged with any other programs.
- b. Interested persons may apply for admission to the HCV (Section 8) program when the waiting list is open. Applications are submitted online via our housing manager webpage at Isothermal.housingmanager.com, following public notice of the date the application process is opened. The waiting list will remain opened until all slots have been filled.

(3) Search Times

- a. The PHA issues vouchers of a 90-day period to search for a unit. A Final extension is granted based on the following:
 - Family requests approval of the final 30-day extension at the end of the initial 90-day period.
 - At the end of 90 days, an additional 30-day extension may also be granted if hospitalization or other family emergency has affected the family's ability to find a unit or if the family demonstrates that a consistent effort has been made to locate a unit.
 - The family has located a unit prior to the 90-day period, but the unit has not passed Housing Quality Standards (HQS) and the landlord is actively involved in bringing it into compliance.
- b. The PHA may grant an additional extension (beyond the normal 120-day duration of a Voucher with approval of the Housing Director. Factors that would warrant consideration would be:
 - As a reasonable accommodation to make the program accessible to and usable by a person with disabilities.
 - Extenuating circumstances such as a death or illness that prevents the family from locating a unit.
 - When family size or other special requirements make finding a unit difficult.
 - When availability of quality affordable housing limits the family's ability to locate suitable housing.

The length of this additional extension would be contingent upon the circumstances on a case-by-case basis.

(4) Admission Preferences

- a. Income targeting – The PHA plans to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the Section 8 program to families at or below 30% of median area income.
- b. Preferences
 1. The PHA has established preferences for admission to the HCV tenant-based assistance program.

2. The PHA has established the following admission preferences:
 - Victims of domestic violence (former Federal preference)
 - Substandard housing/homelessness (former Federal preference)
 - Victims of natural disaster (fire, flood, government action)
 - Referrals from local and state agencies (Departments of Social Services, Health Departments, Mental Health Agencies) faith-based organizations and churches.
 - Elderly and/or disabled head of household or spouse
 - Homeless Referrals
3. Admission preferences adopted by the PHA will be given equal weight in determining selection from the waiting list.
4. Applicants with equal preference status on the waiting list will be selected by time and date of application
5. The pool of applicant families ensures that the PHA will meet income-targeting requirements.

(5) Special Purpose HCV/Section 8 Assistance Programs

- a. The policies governing eligibility, selection, and admissions to any special purpose HCV tenant-based program administered by the PHA can be referenced in the following documents:
 - The HCV Administrative Plan
 - Briefing Packets
 - Federal Regulations (24 CFR Section 984)
- b. The PHA announces the availability of any special-purpose HCV programs to the public through:
 - Published notices
 - Application Process
 - Word of mouth

STATEMENT OF FINANCIAL RESOURCES

Listed below are the financial resources that are anticipated to be available to the PHA for the support of:

- Tenant-based Housing Choice Voucher program

<u>Source</u>	<u>Planned \$</u>
Projected HAP Renewal Funding (based on CY 2021 HAP Renewal Funding)	\$5,897,297
Administrative Fees (projected at 93% lease-up using HUD pro-ratio factor of 82%)	\$821,784
FSS Grant Funding	\$35,143
Fraud Recovery	\$3,674
Total Resources	\$6,651,828
Planned Uses:	\$6,651,828

PHA RENT DETERMINATION POLICIES

- A. Public Housing – N/A
- B. Housing Choice Voucher (HCV)/Section 8

(6) Payment Standard

- a. The payment standard adopted by the PHA is as follows:
 - Cleveland County is set at 110% of the FMR for the zero to six-bedroom sizes.
 - Rutherford County is set at 110% of the FMR for the zero to six-bedroom sizes.
 - McDowell County is 110% of the FMR for the zero to four-bedroom sizes and 105% of the five-bedroom size. The six-bedroom is set at 100% of the FMR.
 - Polk County is set at 110% of the FMR for the zero to four-bedroom sizes, 105% of the five and six-bedroom sizes.
- b. Need for payments standards higher than the FMR are the result of:
 - FMR's are not adequate to ensure success among assisted families in the PHA's segment of the FMR area.
 - To increase housing options for families
- c. Payment standards are reevaluated annually for adequacy.
- d. The factors considered by the PHA in its assessment of the adequacy of its payment standard are as follows:
 - Success rate of assisted families
 - Rent burdens of assisted families
 - Open market rent comparables

(7) Minimum Rent

- a. The PHA has established minimum rent at \$25.
- b. The PHA has adopted a discretionary minimum rent hardship exemption policy when a family is unable to pay “minimum rent” due to a financial hardship. Financial hardships include:
 - Family has lost eligibility or is awaiting an eligibility determination for a Federal, State or local assistance program.
 - Family would be evicted as a result of imposing the minimum rent requirement.
 - Family income has decreased because of changed circumstances including the loss of employment.
 - Death in the family.

OPERATIONS AND MANAGEMENT

A. PHA Management Structure

- (1) An organization chart showing the PHA's management structure is shown in Attachment 1.
- (2) The PHA is located within Foothills Regional Commission (Isothermal Planning & Development (IPDC) Commission) in Rutherfordton, NC, with outreach offices located within the four-county service area (Cleveland/McDowell/Polk/Rutherford). The Housing Director is responsible for administration of the program and staff and reports directly to the Executive director. Success of the program is contingent upon cooperative efforts between program staff.

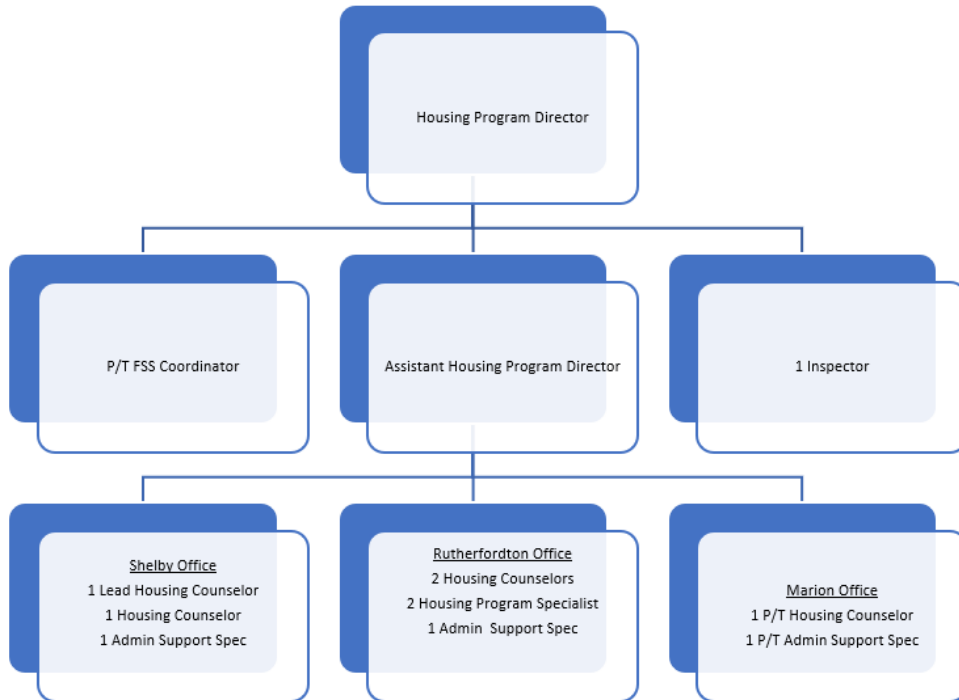
B. HUD Programs Under PHA Management

<u>Program Name</u>	<u>Families Served At Beginning of Year</u>	<u>Expected Turnover</u>
Housing Choice Voucher Program	1,172	16%

C. Management and Maintenance Policies

- (1) Public Housing Maintenance and Management – N/A
- (2) Section 8 Management
 - IPDC Personnel Policy
 - Federal Register
 - Housing Choice Voucher (Section 8) Administrative Plan

Foothills Regional Commission Housing Department Organizational Chart



PHA GRIEVANCE PROCEDURES

A. Public Housing – N/A

B. Housing Choice Voucher (HCV) Tenant-Based Assistance

(1) The PHA has established informal review procedures for applicants to the HCV tenant-based assistance program and informal hearing procedures for families assisted by the HCV tenant-based assistance program in addition to federal requirements found at 24 CFR 982.

- Anonymous complaints are checked as time permits.
- An informal review and/or hearing must be requested within 15 working days from receipt of notice.
- The final decision of the Hearing Officer will be given in writing within seven (7) to ten (10) days following the informal hearing.

(2) Applicants or assisted families may contact either of the following offices to initiate the informal review and informal hearing processes:

- PHA Main Administrative Office
- Local housing offices within the four-county service area

HOMEOWNERSHIP PROGRAMS ADMINISTERED BY THE PHA

A. **Public Housing – N/A**

B. **Housing Choice Voucher (HCV) Tenant-Based Assistance**

- (1) The PHA administers a HCV homeownership program pursuant to Section 8 of the U.S. Housing Act of 1937, as implemented by 24 CFR Part 982.
- (2) Program Description
 - The PHA will limit the number of families participating in the HCV homeownership option to a maximum of sixty-five (65) participants.
- (3) Eligibility for participation in the PHA's program will be in accordance with HUD criteria only.

PHA COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS

A. PHA Coordination with the Welfare (TANF) Agency

(1) The PHA has entered into verbal agreements with TANF agencies in each locality to share information and/or target supportive services (as contemplated by Section 12(d)(7) of the Housing Act of 1937).

(2) Other coordination efforts between the PHA and TANF agency include:

- Client referrals
- Information sharing regarding mutual clients (for rent determination, etc.)
- Coordinate the provision of specific social and self-sufficiency services and programs for eligible families
- Jointly administer programs

B. Services and programs offered to participants

(4) General

a. Self-Sufficiency Policies

The PHA will employ discretionary policies in the FSS Action Plan to enhance the economic and social self-sufficiency of assisted families.

b. Economic and Social self-sufficiency programs

The PHA will coordinate, promote and/or provide referral of the HCV waiting list and/or active participants to the Work Force Investment job training team in an effort to provide the education and training needed to enhance the economic and social self-sufficiency of participants.

(5) Family Self-Sufficiency (FSS) Program

a. Mandated slots beginning FY 2021 – 1

- b. Actual number of participants a/o 02/01/2021 – 23
- c. The FSS Action Plan identifies the following steps that the PHA plans to take to achieve at least the minimum program size.
 - Presentation and solicitation of new membership during:
 1. Initial briefing session (new participants)
 2. Recertification update (current participants)
 - Utilization of a specialized case manager

C. **Welfare Benefit Reduction**

The PHA is complying with the statutory requirements of section 12(d) of 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 tenant-based rent determination policies and train staff to carry out those policies;
- Informing participants of new policy on admission and re-examination;
- Actively notifying participant of new policy at times in addition to admission and re-examination;
- Establishing or pursuing a cooperate agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services;
- Establishing a protocol for exchange of information with all appropriate TANF agencies.

FISCAL AUDIT

The PHA is required to have an audit conducted under Section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)).

- The most recent audit was submitted to HUD.
- There were no findings as a result of that audit.

OTHER INFORMATION

A. Resident Advisory Board Recommendations

- a. The PHA provides opportunity for adult recipients of Section 8 tenant-based assistance to register with the PHA for participation on a tenant advisory board. The current tenant board was supportive of the goals and objectives of the annual and five-year plans with no additional comments following review of the plans.
- b. The PHA meets the exemption criteria provided in section 2(b)(2) of the U.S. Housing Act of 1937.

B. Statement of Consistency with the Consolidated Plan

- The PHA has based its statement of needs of the families in the jurisdiction on the needs expressed in the Consolidated Plan
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiative contained in the Consolidated Plan.
 - a) Provision of quality affordable housing
 - b) Reduce homelessness
 - c) Improve quality of housing stock
 - d) Promote economic self-sufficiency

C. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments:

- Supports Emergency Assistance (TANF), Federal and other housing resources provided by local, state or federal program;
- Proponent for development of affordable housing stock and economic opportunity regardless of race, religion, national origin, sex, familial status and/or disability;
- Community development objectives consistent with Housing & Community Development Act of 1974;
- Collaborative efforts for exchange of information pertaining to available resources to meet housing assistance needs.

FOOTHILLS REGIONAL COMMISSION

NC161

ADDRESSING HOUSING NEEDS FOR VICTIMS OF DOMESTIC VIOLENCE

In accordance with the federal Violence Against Women Reauthorization Act of 2013 (VAWA), the PHA's Administrative Plan which included provisions for the protection of an applicant, a tenant or member of the tenant's family who are victims of domestic violence, dating violence or stalking from being either denied application or being evicted and/or terminated from housing assistance based on acts of violence against them, expanded these protections to include victims of sexual assault.

Policies utilizing definitions as incorporated by the United States Housing Act and applicable language required to inform applicants and/or tenants of their rights mandated by VAWA are included in the following sections of the Administrative Plan:

1. Statement of Policies & Objectives (confidentiality requirements regarding domestic violence, dating violence sexual assault or stalking victims)
2. Eligibility for Admissions
3. Briefing of Families
4. Family Moves
5. Termination or Denial of Assistance
6. Notice of eligibility or denial

The PHA provides all participants with notification of protections and/or rights under VAWA at the time of admissions, upon request for relocation and at annual re-examination. The notice explains the protections afforded under the law, reasons for termination of assistance, procedures for removal of an abuser from the household, documentation that would be required to prove a claim that the application/participant is a victim of domestic violence, dating violence, sexual assault and/or stalking, the PHA confidentiality requirements and contact information for local victim advocacy groups and/or service providers to further enhance the victim safety for assisted families.

In accordance with the agency's Administrative Plan, victims of acts of domestic violence are given a local preference on the waiting list in an effort to provide affordable housing upon availability of funding to support the voucher. HCV staff also works in a collaborative effort with crisis intervention agencies and social service agencies within each of the localities served by the program in filling vacancies in project-based housing with qualifying victims of domestic violence.

Effective with Housing Assistance Payments contracts initiated beginning February 1, 2007, and continuing, the PHA utilizes the applicable Housing Assistance Payments contract (HUD-52641), the Tenancy Addendum (HUD-52641-A) and a generic lease that includes the language required to protect victims of domestic violence, dating violence and/or stalking in the Housing Choice Voucher Program.

ISOTHERMAL PLANNING & DEVELOPMENT COMMISSION

NC161

SECTION 8 HOMEOWNERSHIP CAPACITY STATEMENT

In accordance with the final rule issued on September 12, 2000, and guidelines provided at 982.625, Foothills Regional Commission (RFC) has developed specific guidelines to implement a "Housing Choice Voucher (HCV) Section 8 Homeownership Program." The FRC Board of Directors approved the agency's updated Administrative Plan on November 12, 2002, that included the addition of the "homeownership option" through the Housing Choice Voucher Program.

1. FRC established a minimum homeowner down payment requirement of three (3) percent of the purchase price and will require that a least one (1) percent of the purchase price come from the family's resources.
2. FRC will require that financing for purchase of a home under our "HCV Homeownership Program" be provided, insured or guaranteed by the state or Federal government and that it complies with secondary mortgage market underwriting standards or generally accepted private sector underwriting standards.
3. Section XXX of the Administrative Plan was updated and approved by FRC's Board of Directors on March 8, 2011, to reflect that the PHA shall not impose or enforce any requirement for the recapture of voucher homeownership assistance on the sale or refinancing of a home purchase under the homeownership option. (CFR 980.625 Subpart H).

As of December 2018, four (4) families have become self-sufficient and no longer qualify for subsidy through the HCV program. Since the program inception in 2002, a total of fourteen families have successfully transitioned from the Housing Choice Voucher (HCV) Program to homeownership. Five families completed the pre-homeownership counseling, graduated from the Family Self-Sufficiency program and became homeowners without the need for assistance through the HCV program. There are no families currently being assisted through the HCV Homeownership Program. A total of seven (7) participants in the FSS program have escrow balances and are potential candidates for transitioning into the Homeownership Program.

FOOTHILLS REGIONAL COMMISSION

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FAMILY SELF-SUFFICIENCY PROGRAM STATEMENT

The PHA implemented a Family Self-Sufficiency (FSS) program in late 1997. This program is designed to provide assistance to low-income families participating in the Housing Choice Voucher (HCV) tenant-based program who have expressed a desire to achieve self-sufficiency and are willing to enter into a FSS Contract of Participation whereby the participant identifies and establishes goals that are geared to achieve self-sufficiency. Through case management, the participants are linked with housing and other services needed to enable them to achieve economic independence and self-sufficiency.

The PHA was approved by HUD beginning early 2000 and continuing through 2021 for grant funding of a FSS Coordinator. The coordinator is responsible for recruiting participants and working closely with the family in assessment of needs, development of individualized training and services plans, securing services to meet identified needs, providing ongoing emotional support and encouragement for the families and conducting interagency meetings with the Coordinating Committee

As of April 19, 2002, there were a total of fifty-one (51) required FSS Slots mandated by HUD. Approval was granted in August 2008 by HUD to reduce the number of mandatory slots to 35 following a review of documentation for sixteen (16) participants who successfully completed the FSS program. However, effective May 1, 2021 there is only 1 mandatory slot, due to successful completions. The PHA maintains an average of 25 participants each year.

The PHA will continue its commitment to the support and implementation of the FSS Program for the 2021 Plan year and pledges to:

- Improve coordination of both planning and delivery of services to participants of FSS based on the commitment to assist families in becoming self-sufficient;
- Renew interagency partnerships to achieve high quality comprehensive service delivery to all members of a family with long-term results.
- Assess the accountability of the family, case management and the entities providing services and resources.

For FYE 06/30/20, counseling service and progress monitoring activities were provided to 19 Family Self-Sufficiency (FSS) participants. A total of six (6) new families were recruited into the program. One (1) FSS participant successfully completed the program. A total of \$925.00 was awarded to eligible families upon completion of the FSS Contract of Participation. A total of seven (7) participants have escrow balances and are potential candidates for the Housing Choice Voucher Home Ownership Program.

FOOTHILLS REGIONAL COMMISSION

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PROJECT-BASED VOUCHER STATEMENT

In accordance with Section 232 of the fiscal year 2001 Department of Veterans Affairs and Housing and Urban Development and Independent Agencies Appropriations Act and revisions published in the Federal Register Notice on October 13, 2005 (24 CFR Part 983), the PHA administers project-based tenant assistance. The PHA Administrative Plan (Section XXIX Part 5) contains policies and procedures required for submission and selection of qualifying units for project-based assistance in addition to the requirements for implementation of the Statement of Responsibility for exception units.

Annual Budget Authority (ABA)	1,408 units
20% of available ABA	282 units
Total units allocated to date	68 units

Contingent upon funding for the 2020-2025 plan years, the PHA will continue to support project-based assistance as follows:

Charles Road	8 units	Disabled families
Kings Row	12 units	6 multi-family/6 disabled
<u>Vista Grand*</u>	<u>48 units</u>	Multi-family
Total	68 units	

*Previously named Ashley Meadows

By partnering with local non-profit organizations and private developers, it is hopeful that the PHA will be able to expand housing options during the 2020-2025 plan years for families in Cleveland, McDowell, Rutherford and/or Polk Counties (Region C service area).

Through HUD's project-based Voucher option, the program has been successful in providing newly constructed market rate multi-family units that are affordable and in the best interest of the low-income families in the counties served. This action is consistent with the North Carolina Consolidated Plan and the goals established in the annual and five-year plans:

- Increasing the availability of decent, safe and affordable housing;
- Improving community quality of life and economic vitality;
- Promoting self-sufficiency and asset development of families and/or individuals;
- Ensuring equal opportunity in housing for all eligible families;
- Expanding housing options for elderly and/or disabled families.

FOOTHILLS REGIONAL COMMISSION (NC161)

STATEMENT OF PROGRESS IN MEETING

THE 5-YEAR PLAN MISSION & GOALS

Plan Year 2021

In accordance with Foothills Regional Commission's mission to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination, an average of 1,318 families per month were served by the Housing Choice Voucher Program during fiscal year ending 6/30/20:

A summary of the accomplishments is as follows:

- Achieved 95% utilization of funding and an 84% lease-up.
- Utilized 24 Housing Choice Vouchers (HCV) in providing quality affordable housing through HUD's project-based assistance program.
- Issued 415 vouchers to qualifying families from the Waiting List.
- Initiated housing assistance contracts for 75 first-time Voucher holders.
- Continued partnerships and collaboration with private and/or public agencies (North Carolina Housing Partnership, Habitat for Humanity, Cleveland County Community Development Corporation, McDowell Ministries, Thermal Belt Outreach Ministries) in support of development of affordable housing thus increasing options for HCV participants.
- Implementation of biennial inspections has improved the turn-around time required for re-inspections.
- Continued collaborative efforts with health departments and the North Carolina Attorney General's office in a proactive effort to identify pre-1978 housing units occupied by a child (children) ages six or under that have been diagnosed with an elevated blood level have enabled the PHA to identify families with children at risk and to access and eliminate risk factors if determined to be associated with units contracted through the program.
- The Family Self-Sufficiency Program (FSS) promotes self-sufficiency, asset development and opportunities to pursue homeownership. Counseling services and progress monitoring activities were provided to an average of 19 participants. One (1) participant graduated from the FSS program and no longer need assistance. An average of 7 participants maintained escrow balances for the year. A total of \$925

in earned escrow was awarded to FSS participants upon successful completion of their Contract of Participation.

- In an effort to ensure equal opportunity in housing for all Americans, additional information obtained from the North Carolina Low-Income Housing Coalition pertaining to housing discrimination and specific examples of housing discrimination was provided to all participants. The PHA, through coordination and collaboration with legal aid providers (Pisgah Legal Services and North Carolina Legal Aid) and program participants, advocated for provision of non-discriminatory housing.
- The PHA continues to provide a local preference for an elderly and/or disabled head of household or spouse. Justification for this local preference was in a collaborative effort to increase housing choices for seniors and individuals with disabilities by offering greater control over access to Medicaid-funded long-term care services and in support of the President's New Freedom Initiative and the Money Follows the Person Rebalancing Initiative.
- Through effective utilization of HUD's Employment Income Verification (EIV) procedures, the program recovered \$3,674 resulting from tenant fraud.
- Utilized fifteen (15) Vouchers through the HUD-VASH program (a partnership between Housing and Urban Development (HUD) and the Veterans Affairs Supportive Housing (VASH) to support homeless veterans in finding and maintaining permanent housing.

FOOTHILLS REGIONAL COMMISSION

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Fair Housing & Equal Opportunity Statement

It is the policy of Foothills Regional Commission (referred to as the PHA-Public Housing Authority) to comply fully with all federal, state, and local non-discrimination laws and in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing.

Specifically, the PHA shall not on account of race, color, sex, religion, creed, national or ethnical origin, age, family or marital status, handicap, or disability, deny any family or individual the opportunity to apply for or receive assistance under HUD's Section 8 Housing Choice Voucher program.

The PHA Administrative Plan includes:

1. A "Reasonable Accommodation" policy to ensure that an applicant and/or program participant with a disability is provided with equal opportunity to obtain and enjoy the use of a housing unit contracted through the Housing Choice Voucher Program
2. Expansion of program services by improving access to service for persons with Limited English Proficiency (LEP). The plan defines the conditions requiring an implementation plan for LEP families in addition to guidelines for oral and/or written translation of the program.
3. Language required by the Violence Against Women Act of 2005 that prohibits denial and/or termination of assistance for a family or family member who is a victim of domestic violence, dating violence, or stalking.

To further assist commitment to full compliance with applicable Civil Rights Laws, the PHA provides federal/state/local information to Voucher holders regarding "discrimination" and any recourse available to them should they feel they have been the victim of discrimination. The HUD 903.1 pamphlet, "Are you a Victim of Housing Discrimination" is provided with the initial briefing packet to assist Voucher holders in determining if their housing rights have been denied or if they have experienced housing discrimination. Upon request, staff will assist the tenant and/or applicant relative to information on how to fill out the discrimination complaint.

Also included in the briefing packet is a brochure entitled "A Good Place to Live." This brochure details specific items that a home must have in order to be approved by the PHA in addition to other pertinent information the tenant should consider that would help the family to choose a good rental unit. After reading this brochure, it is hopeful the Voucher holder will have a clearer understanding of housing quality standards, why they are important, and ultimately help them to find a good place to live.

Participants in the Housing Choice Voucher Program are informed of the protections and rights afforded by the Violence Against Women Act of 2005 upon admissions and at each annual re-examination. A pamphlet is provided explaining the protections afforded under the law and informs the participant of PHA confidentiality requirements. Contact information for local victim advocacy groups and/or service providers is made available to an applicant, a tenant, or member of a tenant's family who is determined to be a victim of acts of domestic violence, dating violence and/or stalking against them.

Information packets are available for landlords who express an interest in renting to tenants through the Section 8 program. The Fair Housing Information pamphlet, the brochure entitled "A Good Place to Live," and a brochure informing the owner/agent of the protections provided by the Violence Against Women Act of 2005 are included in this packet along with other pertinent information regarding the HCV program and its requirements.

Program staff actively participated in an Analysis to Impediments to Fair Housing for the counties of Cleveland, McDowell, Polk and Rutherford. The analysis is an exploration of many housing and housing related policies and/or practices in use throughout Region C that may inadvertently or deliberately prevent families from living where they choose. This analysis serves as a tool to assist in the development of the Annual Action Plan for fair housing activities and as an educational tool for housing planners, policymakers, housing providers and other stakeholders in the community.

FOOTHILLS REGIONAL COMMISSION (NC161)

STATEMENT REGARDING THE STEPS THE AGENCY WILL TAKE TO AFFIRMATIVELY FURTHER FAIR HOUSING

Foothills Regional Commission (FRC) conducts annual conducts activities in accordance with federal laws to ensure that all applicants and tenant families are treated equally and provided the same quality of service regardless of family characteristics and/or background. IPDC is committed to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. IPDC staff participated in development of the Analysis of Impediments to Fair Housing for the jurisdictions served by the Housing Choice Voucher (HCV) program.

1. Steps to Overcome the effects of impediments to faire housing choice that were identified in the jurisdictions Analysis of Impediments to Fair Housing Choice:

- a. Provide landlord and tenant guides to educate property owners and residents of housing problems, housing availability and housing discrimination.
- b. Display fair housing posters and provide brochures in housing office within each jurisdiction.
- c. Provide landlord information packets as a marketing and educational tool for the HCV program (includes information on landlord/tenant rights, housing discrimination and protections provided by the Violence Against Women Act of 2005).
- d. Staff participation in fair housing workshops and training activities.
- e. Provide equal opportunity for HCV participants to obtain education (high school diploma, GED, associates degree, technical training, etc), job training, financial literacy, credit counseling, and life enrichment skills through the Family Self Sufficiency and Homeownership programs.
- f. Collaboration with local realtors, lenders, service providers and non-profit organizations to expand opportunities for low-income home buyers.
- g. Participation in regional efforts to identify and analyze impediments to fair housing.

2. Steps to remedy discrimination in housing:

- a. Educate owners, landlords and agents on Fair Housing Laws and Regulations via meetings and distribution of "HCV Landlord Packets."
- b. Marketing the program to all eligible persons, including persons with disabilities and person with limited English proficiency.
- c. Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities.
- d. Provide assistants to clients in documenting allegations of housing discrimination and/or completing and submission of a housing discrimination claim (includes proving the toll free number for the Housing Discrimination Hotline: 1-800-669-9777).

- e. Refer allegations of discrimination to the applicable “Citizen’s Advisory Committee” and HUD’s Department of Fair Housing.
- f. Participate in the investigation of fair housing and/or discrimination complaints.
- g. Participate in fair housing and predatory lending workshops.
- h. Advocating for HCV participants to ensure equal opportunity in acquiring quality affordable housing of their choice.

3. Steps to promote fair housing rights and fair housing choice:

- a. Provide fair housing education and related printed materials (includes specific examples of discrimination and procedures for filing a housing discrimination claim) for first-time Voucher holders during the initial briefing session.
- b. Provide information and related printed materials (i.e., A Good Place to Live) to HCV participants to assist the family in selecting a good place that will meet the needs of the family.
- c. Collaborating with local governments, non-profit legal aid providers and the North Carolina Low Income Housing Coalition.
- d. Updating and distribution of fair housing and housing discrimination related materials to program participants, property owners/agents and the community.
- e. Leverage HCV vouchers through HUD’s project-based assistance option in providing newly constructed housing units outside of high minority and/or high poverty areas.

FRC strives to protect the rights of citizens and is dedicated to the mission of promoting adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination. Record keeping covers, but is not limited to, race, ethnicity, familial status and disability status of participants.

FOOTHILLS REGIONAL COMMISSION

NC161

AMENDMENTS/MODIFICATIONS TO THE PLAN

Per 24 CFR 903.21, the PHA may amend or modify the Annual or Five-Year Plan after submission to HUD. Modification, amendment or change to any policy, rule, regulation or other aspect of the approved PHA Plan must comply with HUD requirements.

PHA Definition of modification changes:

- i. **Significant Amendment** - addition of and/or a change of importance in a policy, rule, regulation or other aspect of the plan that affects eligibility, admissions, continued assistance, administrative and/or programmatic requirements set forth by the agency plan.
- j. **Substantial Deviation/Modification** - addition of and/or a change of importance in a policy, rule, regulation or other aspect of the plan that would fundamentally alter the nature of the provider's operations as set for by the agency plan.

Any significant amendment or substantial deviation or modification to the PHA Plan is subject to the following requirements:

- The PHA must ensure consistency with the Consolidated Plan of the jurisdiction as defined in 24 CFR 903.15; and,
- The PHA must provide for a review of the amendments/modifications by the public during a 45-day public review period (as defined in 24 CFR 903.17).
- The PHA may not adopt the amendment or modification until the PHA has duly called a meeting of its Board of Directors. The meeting, at which the amendment or modification is adopted, must be open to the public.
- The PHA may not implement the amendment or modification until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD's plan review procedures (as defined in 24 CFR 903.23).

The PHA may submit a significant amendment or substantial deviation modification to HUD up until the last day prior to the date when the next year's plan is due. Submission of a significant amendment or substantial deviation modification would need to be completed in the same manner required for submission of the original PHA Plan.