

DRAFT



**ORANGE COUNTY HOUSING AUTHORITY
FIVE YEAR PLAN
AND
2015 ANNUAL PLAN**

FOR PUBLIC REVIEW AND COMMENT

**PUBLIC HEARING: WEDNESDAY, AUGUST 31, 2015, 6:00 PM
AT SOUTHERN HUMAN SERVICES (ROOM D)
2501 HOMESTEAD ROAD, CHAPEL HILL**

ORANGE COUNTY DEPARTMENT OF
HOUSING, HUMAN RIGHTS AND COMMUNITY DEVELOPMENT
300 WEST TRYON STREET
P.O. BOX 8181
HILLSBOROUGH, NC 27278
(PHONE: 919-245-2490)

2015

PHA Plan Update

(a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:

Goal 1: Expand the resources for affordable housing and the supply of assisted housing.

Objective 1: Maximize existing affordable housing resources and apply for additional rental housing vouchers.

Objective 3: Develop and implement an outreach plan to increase the number of landlords participating in the Section 8 Program.

Goal 3: Provide homeownership opportunities to low income renters at or below 50% of Area Median Income (AMI).

Objective 1: Enhance and expand voucher homeownership program to achieve more successful participants.

Objective 2: Collaborate with community partners to provide outreach and further counseling and financial education for families.

Goal 5: Identify and coordinate services to promote greater economic and self-sufficiency opportunities for assisted families.

Objective 1: Collaborate with community partners to provide outreach and coordinated services for assisted families.

Objective 2: Examine successful self-sufficiency programs and develop a program for assisted families.

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

Orange County Housing and Community Development Department
300 W. Tryon Street/P.O. Box 8181
Hillsborough, NC 27278

PHA Plan Elements (24 CFR 903.7)

1. **Eligibility, Selection and Admission Policies, including Deconcentration and Wait List Procedures.** SEE ATTACHMENT - 1: This information is provided from Chapter 4 of the *Orange County Housing Authority Section 8 Housing Choice Voucher Administrative Plan*.

2. **Financial Resources.** Resources anticipated to be available for the Orange County Housing Authority tenant-based rental assistance program include:

Section 8 Housing Choice Voucher (HCV) Program - Federal funds for Housing Assistance Payments and Administrative Fee and County General Funds for supplementing Administrative Cost of the Section 8 HCV Program

Other Resources. Other resources anticipated to be available for affordable housing administered by the Orange County Department of Housing, Human Rights and Community Development include:

HOME Program – Federal funds and local 25% match and supplemental Program administrative funds for housing construction, down payment and closing cost assistance for homebuyers, rehabilitation and tenant-based rental assistance for homeless individuals and families.

Urgent Repair Program – Local funds for emergency repair of homes of elderly and/or disabled homeowners.

Housing Rehabilitation - State funds (North Carolina Housing Finance Agency) for moderate rehabilitation of owner occupied homes.

Fair Housing Program – Federal funds and local funds supplement administrative costs for carrying out fair housing outreach, investigation and conciliation of complaints.

3. **Rent Determination.** No housing assistance payment (HAP) contract can be approved until the PHA has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program. HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premise. The description of the method used to determine whether a unit's rent is reasonable is provided in Part III, Chapter 8 of the *Orange County Housing Authority Section 8 Housing Choice Voucher Administrative Plan*.

4. **Operation and Management.** N/A (Applicable public housing only.)

5. **Grievance Procedures.** When the PHA makes a decision that has a negative impact on a family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal hearing. A description of the complete process and procedures is provided in Chapter 16 of the *Orange County Housing Authority Section 8 Housing Choice Voucher Administrative Plan*.

6. **Designated Housing for Elderly and Disabled Families.** N/A (Applicable public housing only.)

6.0

6.0	<p>PHA Plan Update (cont.)</p> <p>7. Community Service and Self-Sufficiency. The Department of Housing, Human Rights and Community Development and the Orange County Housing Authority have partnered with community agencies to provide services toward homeownership and self-sufficiency and to address and prevent homelessness. Examples of services provided by our community partners include helping applicants find housing to use their voucher, providing homeownership counseling and financial planning and providing tenant based rental assistance for homeless individuals and families.</p> <p>8. Safety and Crime Prevention. N/A (Applicable public housing only.)</p> <p>9. Pets. N/A (Applicable public housing only.)</p> <p>10. Civil Rights Certification. SEE ATTACHMENT – 2.</p> <p>11. Fiscal Year Audit. For the Year ended June 30, 2014, the auditor’s opinion was that Orange County complied in all material respects, with compliance requirements that could have a direct and material effect on each of its major federal programs which included the Section 8 Housing Choice Voucher Program. One deficiency was identified that was corrected concerning compliance with timely submission of a HUD financial report.</p> <p>12. Asset Management. N/A (Applicable public housing only.)</p> <p>13. Violence Against Women Act (VAWA). SEE ATTACHMENT – 3.</p>
7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <p>1. The Housing Authority Board researched other successful programs and developed and approved Voucher Homeownership Program guidelines. The guidelines were submitted to the local HUD field office as an addendum to the Administrative Plan. Two HCV participants have successfully achieved homeownership.</p> <p>2. The agency will continue to provide project based vouchers to the Club Nova Apartments in Carrboro – an apartment complex for persons with disabilities. In the future, project-based vouchers will be used primarily as a method for making projects for hard to house populations financially feasible, consistent with our objective of leveraging private and public funds to create housing opportunities.</p>
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p>
8.3	<p>Capital Fund Financing Program (CFFP).</p> <p><input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>
9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p>Housing needs information is provided from the Needs Assessment Section (pp.36 -63) and the Housing Market Section (pp.66 – 81) of the <i>Orange County HOME Consortium Five Year Consolidated Plan: 2015 – 2020</i>. SEE ATTACHMENT – 4.</p>

9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <p>The Orange County Housing Authority is a partner with the Orange County Department of Housing and Community Development in the effort to address our jurisdiction's affordable housing needs by continuing to work collaboratively to address the housing priorities of the Consolidated Plan. These efforts include: continuing a waiting list preference system to address the housing needs of the county population at or below 30% - 50% AMI; administering HOME funded rental housing subsidies for special populations including the homeless; applying for additional vouchers when funding is available; and identifying and developing other resources to expand affordable housing and services that promote economic opportunities and self-sufficiency for families with very low income.</p> <p>Currently, the Section 8 Waiting List has approximately 1252 applicants and has been closed to further applicants since March 31, 2010. It is anticipated that the waiting list will remain closed during the new Program year; however, turnover vouchers will be issued to applicants as they become available.</p>
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Additional Information. Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

Goal 1: Expand the supply of assisted housing

Objective 1: Apply for additional rental housing vouchers

Objective 2: Collaborate with the local HOME Program to provide tenant based rental vouchers.

The PHA is continuing to administer a small number of HOME funded tenant based rental assistance units.

Goal 2: Improve the quality of assisted rental housing

Objective 1: Improve voucher management: SEMAP Score 100

Objective 2: Review and modify Housing Quality Standards to ensure a quality rental housing inventory.

The PHA is continuing to implement an Action Plan to conduct quality control inspections and improve Program performance by examining and strengthening Program procedures.

Goal 3: Provide homeownership opportunities to low income renters at or below 50% of Area Median Income (AMI).

Objective 1: Implement voucher homeownership program

The Housing Authority Board approved Voucher Homeownership Program guidelines and has two HCV participants that successfully achieved homeownership.

Goal 4: Prevent homelessness

Objective 1: Provide Section 8 waiting list applicants a preference for homelessness

Objective 2: Collaborate with the local HOME Program to provide tenant based rental vouchers to the homeless population

The PHA currently has a waiting list preference for homelessness and is currently administering a small number of HOME funded tenant based rental assistance units through community partners.

(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"

a. Substantial Deviation from the 5-Year Plan

Substantial deviation is defined as a change in one of the following:

1. Change in the PHA's Overall Mission; or
2. Change in the PHA's goals and objectives that affect services provided to local residents.

Disclaimer: This does not include changes necessary as a result of changes in HUD regulatory requirements.

b. Significant Amendment or Modification to the Annual Plan

Significant Amendment is defined as a change in one of the following:

1. Change in admission policies
2. Change in rent policies; or
3. Change in the organization of the waiting list.

Disclaimer: This does not include changes necessary as a result of changes in HUD regulatory requirements.

0.0

11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations (which includes all certifications relating to Civil Rights) SEE ATTACHMENT - 5</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) N/A</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) N/A</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) N/A</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) N/A</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. SEE ATTACHMENT – 6</p> <p>(g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged. SEE ATTACHMENT – 7</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) N/A</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only) N/A</p>
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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 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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.

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.
7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.
13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year; until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only)
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only)
- (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.

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 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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.

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Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

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

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.

10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.

12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

(a) **Hope VI or Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>

(b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm

Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.

(c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

(d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

(e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

- 1. At the end of the program year; until the program is completed or all funds are expended;
- 2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
- 3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan
PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.*
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.*

ATTACHMENT – 1

Eligibility, Selection, and Admissions Policies, including Deconcentration and Wait List Procedures. The following procedures as referenced in Section 6.0 above are from Chapter 4 of the *Orange County Housing Authority Section 8 Housing Choice Voucher Administrative Plan*.

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, selecting families from the waiting list and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that the PHA affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. The first step is a pre-application, after which the family may be placed on the waiting list.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. This is done through the completion of a pre-application. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

Families may obtain pre-application forms from the PHA's office during normal business hours. PHA Staff will assist with completing the pre-application.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or the PHA must provide an alternate approach that provides full access to the application process.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1].

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete pre-application received and make a preliminary assessment of the family's eligibility

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

If the PHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of receiving a complete application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

Eligible for Placement on the Waiting List

The PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

HUD imposes requirements on how a PHA may structure its waiting list and how families must be treated if they apply for assistance from a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

The PHA's HCV waiting list must be organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The waiting list must contain the following information for each applicant listed:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality.

The PHA will maintain a single waiting list for the HCV program.

4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

Closing the Waiting List

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

The PHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 36 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it cannot be reopened until the PHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

Chapel Hill Herald

Chapel Hill News

News of Orange

WCHL radio

4-II.D. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]

The PHA must conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires the PHA to serve a specified percentage of extremely low income families (see Chapter 4, Part III), the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list.

Purging the Waiting List

The waiting list will be updated annually to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, or by fax. Responses should be postmarked or received by the PHA not later than 30 calendar days from the date of the PHA letter.

If the family fails to respond within 30 calendar business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 30 calendar days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director may reinstate the family if s/he determines the lack of response was due to PHA error, or to circumstances beyond the family's control.

Removal from the Waiting List

If at any time an applicant family is on the waiting list, the PHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA's decision (see Chapter 16) [24 CFR 982.201(f)].

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. The PHA must maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award a PHA funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

The PHA administers the following types of targeted funding:

None currently

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

The PHA uses the following local preference system:

- *Date and time of receipt of a completed application.*
- *Residency preference for families who live, work, or have been hired to work in the jurisdiction.*
- *Veteran preference: veterans or surviving spouses of veterans.*
- *Disability preference: This preference is extended to disabled persons or families with a disabled member as defined in this plan. Proof of disability will be required at time of selection.*
- *Families who are graduates of or active participants in educational and training programs designed to prepare the individual for the job market.*
- *Graduates of transitional housing programs for homeless/substance abuse/victims of domestic abuse.*
- *Involuntarily displaced.*

- *Currently living in substandard housing (including homeless families).*
- *Currently paying more than 50% of income for rent and utilities (“Rent Burden”).*

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during the PHA’s fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

4-III.D. NOTIFICATION OF SELECTION

The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

Who is required to attend the interview

Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

4-III.E. THE APPLICATION INTERVIEW

Families selected from the waiting list are required to participate in an eligibility interview.

The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to the PHA.

The interview will be conducted only if the head of household or spouse/cohead provides appropriate documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

*Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for **thirty (30) calendar days**. If not all household members have disclosed their SSNs at the next time the PHA is issuing vouchers, the PHA will issue a voucher to the next eligible applicant family on the waiting list.*

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 30 calendar days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a

family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. The PHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If the PHA determines that the family is eligible to receive assistance, the PHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

Civil Rights Certification. Attached.

Civil Rights Certification

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Civil Rights Certification**Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

 PHA Name

 PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Name of Authorized Official	Title
Signature	Date

**Violence Against Women Act (VAWA)
for the Section 8 Housing Choice Voucher Program**

As required under Section 603 of Title VI, Violence Against Women and Department of Justice Reauthorization Act of 2005 Amending Section 5(A) of the U.S. Housing Act of 1937.

The Orange County Housing Authority will assist and provide support to families that are victims of domestic violence, dating violence and stalking in order to enhance their quality of life. The Orange County Housing Authority will increase staff and family awareness, exercise discretion, sensitivity and excellent customer service when providing agency services and/or referrals.

The Orange County Housing Authority will provide decent and affordable housing for victims of domestic violence, dating violence and stalking; make referrals to agency partners based on client needs; and educate Orange County staff and clients on the seriousness of domestic violence in order to enhance quality of life for the victim and family.

Services/Programs/Activities:

1. Keep a confidential list of self-identified domestic violence victims maintained by the Housing Specialist. With approval of the client, make agency referrals to agency partners based on client needs.
2. Develop and maintain a list of resources for referrals by staff.
3. Strongly encourage victims to participate in counseling programs and report any incidents.
4. Provide educational information to applicants, participants, landlords/property managers and staff.
5. Develop and deliver training to staff in collaboration with community experts on the rights of domestic violence victims and Program procedures in working with victims and their families.

ATTACHMENT – 4

Housing Needs. The following housing needs information as referenced in Section 9.0 above is provided from the Needs Assessment Section (pp.36 -63) and the Housing Market Section (pp.66 – 81) of the *Orange County HOME Consortium Five Year Consolidated Plan: 2015 – 2020*. (The Orange County HOME Consortium consists of Orange County and the towns of Carrboro, Chapel Hill and Hillsborough.)

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Orange County used the HUD Comprehensive Housing Affordability Strategy (CHAS) data, which provides statistical data on housing needs, to prepare its estimates and projections. The tables in this section have been pre-populated with HUD data sets based on the American Community Survey (ACS) five year estimates, and the 2010 U.S. Census. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

Orange County is part of Orange County Partnership to End Homelessness Continuum of Care. Data for the development for the homeless needs section was obtained from the Director of the Orange County Partnership to End Homelessness.

Additional needs for Orange County were obtained from input and interviews with various social service agencies, housing providers, County staff, and survey responses from residents.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Based on a comparison between the 2000 and 2011 population, Orange County had an 11% increase in its population. The total population increase was 13,354 persons living in 5,052 new households. Furthermore, the median income of the area increased by 32%. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2000 and 2011, the cumulative inflation rate was 30.6%, meaning that the \$42,372.00 median income in 2000 would be \$55,337.83 if it were expressed in 2011 dollars. By taking into consideration the rate of inflation, median income growth in Orange County has exceeded the rate of inflation.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	119,430	132,784	11%
Households	46,586	51,638	11%
Median Income	\$42,372	\$56,055	32%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	7,585	5,030	7,315	3,920	27,790
Small Family Households *	1,665	1,630	2,465	1,540	15,760
Large Family Households *	460	250	345	165	1,500
Household contains at least one person 62-74 years of age	469	900	1,009	529	4,525
Household contains at least one person age 75 or older	560	473	670	293	1,995
Households with one or more children 6 years old or younger *	1,064	815	1,052	387	3,308

* the highest income category for these family types is >80% HAMFI

Table 6 - Total Households Table

Data Source: 2007-2011 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	130	25	30	0	185	14	0	54	0	68
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	110	90	10	10	220	0	0	29	0	29
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	200	150	115	35	500	80	39	74	0	193
Housing cost burden greater than 50% of income (and none of the above problems)	4,245	1,049	280	60	5,634	930	730	654	229	2,543

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	250	1,129	1,544	259	3,182	219	340	750	560	1,869
Zero/negative income (and none of the above problems)	544	0	0	0	544	260	0	0	0	260

Table 7 – Housing Problems Table

Data 2007-2011 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,695	1,319	440	105	6,559	1,015	775	818	229	2,837
Having none of four housing problems	695	1,654	3,860	1,809	8,018	389	1,300	2,185	1,770	5,644
Household has negative income, but none of the other housing problems	544	0	0	0	544	260	0	0	0	260

Table 8 – Housing Problems 2

Data 2007-2011 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,084	787	369	2,240	283	349	669	1,301
Large Related	325	19	55	399	120	38	34	192
Elderly	330	160	155	645	308	379	413	1,100
Other	3,115	1,270	1,245	5,630	514	294	288	1,096
Total need by income	4,854	2,236	1,824	8,914	1,225	1,060	1,404	3,689

Table 9 – Cost Burden > 30%

Data 2007-2011 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	870	238	20	1,128	238	260	314	812
Large Related	230	0	0	230	90	38	0	128
Elderly	275	80	0	355	213	154	179	546
Other	3,040	730	260	4,030	445	269	159	873
Total need by income	4,415	1,048	280	5,743	986	721	652	2,359

Table 10 – Cost Burden > 50%

Data 2007-2011 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	294	150	125	45	614	80	39	93	0	212
Multiple, unrelated family households	0	35	0	0	35	0	0	10	0	10

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	15	55	0	0	70	0	0	0	0	0
Total need by income	309	240	125	45	719	80	39	103	0	222

Table 11 – Crowding Information - 1/2

Data Source: 2007-2011 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source:
Comments:

Describe the number and type of single person households in need of housing assistance.

According to the 2007-2011 American Community Survey (ACS), there were 50,837 households in 2011 in Orange County. Based on this number of households, 14,489 (28.5%) of all households were single person households living alone. Single person households aged 65 and over comprised 3,254 households or (6.4%) of all households. Based on the ACS estimates, 22.5% of all persons living alone are seniors, and it is presumed that as they age in place, additional accommodations and supportive services will be necessary for this portion of the County’s population. The County will need to assist in obtaining funding and collaborating with housing service and elderly support agencies to provide programs, activities and accommodations for its elderly population.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled Population – Based on the 2000 CHAS Data and the 2007-2011 ACS Data, it is estimated that 47% of all disabled renters have a housing problem that includes cost overburdened by 30% or another type of housing problem, and 32% of disabled homeowners have a housing problem that includes cost overburdened by 30% or another type of housing problem. A breakdown of the types of disability as a percent of the entire population of Orange County is as follows: hearing difficulty = 2.21%; vision difficulty = 1.09%; cognitive difficulty = 3.89%; ambulatory difficulty = 4.34%; self-care difficulty = 1.41%; and independent living difficulty = 2.67%.

Victims of Domestic Violence, Dating Violence, sexual assault, and stalking – Based on the local crime statistics and social service agency responses to interviews and surveys, it is estimated that approximately 150 single family households and family households that are victims of domestic violence, dating violence, sexual assault, and stalking, are in need of housing assistance. Based on national statistics, about three fourths of the victims are female.

What are the most common housing problems?

The largest housing problem in Orange County is affordability. According to the 2007-2011 ACS data, 44.1% of all renter households are cost overburdened by 30% or more, and 12.1% of all owner households are cost overburdened by 30% or more. Furthermore, 28.4% of renter households are cost overburdened by 50% or more while only 7.7% of owner households are cost overburdened by 50% or more. This demonstrates a substantial difference between owner occupied households and renter occupied households. Not only is there a significant portion of renter occupied households that are cost overburdened, renter occupied households are three to four times as likely to be cost overburdened than their owner occupied counterparts.

In consultations, interviews and surveys, the lack of quality, affordable housing for rent is the largest unmet housing need in Orange County. A combination of insufficient code enforcement, strong homeownership market, and high market rents contribute to this problem.

Are any populations/household types more affected than others by these problems?

Yes, the elderly and disabled populations are the most affected by the high cost of housing in Orange County. The elderly and disabled are on fixed or limited incomes and are unable to keep up with the rising cost of housing in Orange County.

Another group affected by the lack of affordable housing is the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence. These subgroups have limited or no income and therefore are unable to afford the increasing cost of housing in Orange County.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The Orange County Partnership to End Homelessness does not collect this data specific to the County's CoC. The County's Rapid Rehousing program serves people with some income. The CoC believes these individuals are more likely to be stable in permanent houses even when assistance ends.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Orange County Partnership to End Homelessness has not developed a CoC-specific definition of an at-risk group. The CoC's programs and initiatives that serve people at-risk of homelessness tend to focus on those with criminal histories, who are aging out of foster care and generally those who have high barriers to stable housing.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The high cost of decent, safe, and sanitary housing in the area creates instability and an increased risk of homelessness for lower income families in the area. Many families are living from paycheck to paycheck and are paying over 30% of their income for housing.

The other housing characteristic that adds to the instability is the lack of housing counseling services. For example, residents need to be aware of predatory lending practices, the risk of purchasing a house through a "land contract," the lack of knowledge on home maintenance, and financial planning and management of money for the operation of a home.

Discussion

Orange County's population is growing. However, the population growth is mainly in the higher income household category. This raises the value of housing, both owner occupied and renter, and creates a shortage of decent, safe and sound housing that is affordable to very low-, low-, and moderate-income persons. Based on the HUD CHAS data, Orange County is facing a housing crisis for lower income persons who cannot afford to live in the southern and eastern parts of the County.

Attached to this Plan are maps which illustrate Orange County's demographics and housing concentrations.

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205

(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the planning process for the preparation of Orange County's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The total number of White Households in Orange County is 39,280 households (77.27%); the number of Black/African American Households is 6,738 households (13.25%); the number of Asian Households is 2,973 households (5.85%); and the number of Hispanic Households is 2,574 households (5.06%).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,170	614	805
White	3,455	370	550
Black / African American	1,455	234	115
Asian	500	0	100
American Indian, Alaska Native	4	0	30
Pacific Islander	0	0	0
Hispanic	619	0	4

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2007-2011 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,560	1,465	0
White	2,175	905	0
Black / African American	555	473	0
Asian	260	15	0
American Indian, Alaska Native	10	10	0
Pacific Islander	0	0	0
Hispanic	444	55	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2007-2011 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,555	3,760	0
White	2,550	2,505	0
Black / African American	439	845	0
Asian	150	60	0
American Indian, Alaska Native	15	15	0
Pacific Islander	0	0	0
Hispanic	340	279	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2007-2011 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,175	2,754	0
White	890	1,914	0
Black / African American	179	365	0
Asian	45	235	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	45	150	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2007-2011 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

The racial composition of households in Orange County, according to the 2007-2011 American Community Survey, was 77.27% White; 13.25% African American/Black; and 5.85% Asian. The Hispanic/Latino population was 5.06%. The 0-30% AMI Black/African American group was disproportionately affected by housing problems. Black/African Americans make up 13.25% of total households, yet this group has 23.58% of all housing problems in the 0-30% AMI income category.

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the planning process for the preparation of Orange County’s Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by severe housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. Data detailing information by racial group and Hispanic origin has been compiled from the CHAS data and the 2007-2011 American Community Survey. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons in that group as a whole. The following tables illustrate the disproportionate needs of Orange County.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,705	1,080	805
White	3,255	570	550
Black / African American	1,335	355	115
Asian	450	50	100
American Indian, Alaska Native	0	4	30
Pacific Islander	0	0	0
Hispanic	539	80	4

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2007-2011 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,090	2,935	0
White	1,330	1,740	0
Black / African American	353	678	0
Asian	155	120	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	139	364	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2007-2011 CHAS
Source:

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,258	6,040	0
White	838	4,200	0
Black / African American	148	1,135	0
Asian	35	175	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	245	369	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2007-2011 CHAS
Source:

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	334	3,585	0
White	239	2,565	0
Black / African American	50	500	0
Asian	10	270	0
American Indian, Alaska Native	0	45	0
Pacific Islander	0	0	0
Hispanic	35	160	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2007-2011 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

The racial composition of households in Orange County, according to the 2007-2011 American Community Survey, was 77.27% White; 13.25% African American/Black; and 5.85% Asian. The Hispanic/Latino population was 5.06%. There were two (2) disproportionately impacted group in terms of severe housing problems. Black/African American households represent 13.25% of the total households, yet comprise 23.4% of the severe housing problems in the 0-30% AMI category. Hispanic/Latino households represent 5.06% of the total households, yet comprise 19.48% of the severe housing problems in the 50-80% AMI category.

**NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205
(b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

During the planning process for the preparation of Orange County’s Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the County. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

The greatest housing problem facing Orange County, NC is the lack of affordable housing and the fact that many of the County’s lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 5,425 White households were cost overburdened by 30% to 50%, and 966 White households were cost overburdened by greater than 50%; 966 Black/African American households were cost overburdened by 30% to 50%, and 1,734 Black/African American households were cost overburdened by greater than 50%; and lastly, 644 Hispanic households were cost overburdened by 30% to 50%, and 573 Hispanic households were cost overburdened by greater than 50%.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	9,259	5,330	8,418	830
White	26,705	5,425	5,864	570
Black / African American	3,835	966	1,734	115
Asian	1,845	545	580	100
American Indian, Alaska Native	84	29	0	30
Pacific Islander	0	0	0	0
Hispanic	1,289	664	573	4

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion

The racial composition of households in Orange County, according to the 2007-2011 American Community Survey, was 77.27% White; 13.25% African American/Black; and 5.85% Asian. The Hispanic/Latino population was 5.06%.

According to the data provided, there were no disproportionately impacted groups in terms of cost overburdened. However there are some statistical inconsistencies with the data provided by HUD. In the "Less than 30%" category, 26,705 White households are cost overburdened out of a total of 9,259 households. This is not possible, since it is not possible to have more of one racial/ethnic group than the total households. In the "30-50%" category, 5,425 White households are cost overburdened out of a total of 5,330 households. This is also not possible, since it is not possible to have more of one racial/ethnic group than the total households.

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The racial composition of households in Orange County, according to the 2007-2011 American Community Survey, was 77.27% White; 13.25% African American/Black; and 5.85% Asian. The Hispanic/Latino population was 5.06%.

There is one (1) disproportionately impacted group in terms of having a housing problem: the 0-30% AMI Black/African American group.

There are two (2) disproportionately impacted groups in terms of having a severe housing problem: the 0-30% AMI Black/African American group and the 50-80% AMI Hispanic/Latino group.

When examining the percentage of each race or ethnic group with a housing problem, a severe housing problem, and a housing cost overburdened, a different picture presents itself. 54.51% of all Hispanic households experienced a housing problem, while 39.00% of Black/African American households, and 23.9% of White households experienced one. These numbers follow a similar pattern with severe housing problems, with 35.86% of Hispanic households, 27.99% of Black/African American households, and 14.41% of White households experiencing severe housing problems. These numbers show that if you are Black/African American or Hispanic, you are more likely to experience a housing problem or a severe housing problem than you are if you are any other racial or ethnic group.

If they have needs not identified above, what are those needs?

There are no additional needs that have not been previously identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The most recent data available on the concentration of racial or ethnic groups is the 2010 U.S. Census data. According to this data, Orange County has a minority population of 25.64% of its total population. HUD defines a Minority Neighborhood as, "A neighborhood in which the percentage of persons of a particular racial or ethnic minority is at least 20 points higher than that minority's percentage in the housing market as a whole; the neighborhood's total percentage of minority persons is at least 20 points higher than the total percentage of minorities for the housing market area as a whole; or in the case of a metropolitan area, the neighborhood's total percentage of minority persons exceeds 50 percent of its population." According to this definition, there are no Census Tracts in Orange County that are considered a "Minority Neighborhood."

Attached to this Plan are maps which illustrate Orange County's demographics and racial concentrations.

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

The Orange County Housing Authority Board operates the Section 8 Housing Voucher Program. The program provides approximately 623 vouchers to low income families. The Orange County Board of Commissioners appoints a seven member Housing Authority Board who serves as the governing board and the managerial affairs of the County conform to applicable County ordinances and policies. The Orange County Housing Authority Board of Commissioners sets policy for the public housing functions and approves the Annual Public Housing Agency Plan.

The Chapel Hill Department of Housing and Community Development's mission is to "Provide decent, safe, and affordable rental housing to Chapel Hill's public housing families." The Department manages 336 public housing units in Chapel Hill and Carrboro.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	324	613	6	607	0	0	0

Table 22 - Public Housing by Program Type
***Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based		Veterans Affairs Supportive Housing
# Homeless at admission	0	0	1	12	0	12	0	0
# of Elderly Program Participants (>62)	0	0	52	154	1	153	0	0
# of Disabled Families	0	0	36	273	5	268	0	0
# of Families requesting accessibility features	0	0	324	613	6	607	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 -- Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based		Veterans Affairs Supportive Housing	Family Unification Program
White	0	0	34	257	4	253	0	0	0
Black/African American	0	0	260	349	2	347	0	0	0

Race	Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers			Tenant-based	Special Purpose Voucher		
				Total	Project-based	Tenant-based		Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Asian	0	0	29	3	0	3	0	0	0	0
American Indian/Alaska Native	0	0	1	4	0	4	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition										

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers			Tenant-based	Special Purpose Voucher		
				Total	Project-based	Tenant-based		Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	11	17	0	17	0	0	0	0
Not Hispanic	0	0	313	596	6	590	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition										

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Chapel Hill Department of Housing and Community Development determined that its needs include: single level units, handicap ramps, grab bars in the bathroom, and additional fully accessible units.

The Orange County Housing Authority works entirely with Section 8 Housing Choice Voucher holders. Those with Section 8 Housing Choice Vouchers experience the same general need for accessible housing that other low-income residents of Orange County experience.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Information on the number and type of families on the waiting list for Section 8 assistance is not available. There is a need for an increase in the Fair Market Rents in Chapel Hill and Carrboro. The HUD established Fair Market Rents in these areas are lower than the actual market rent, disincentivizing landlords from renting to Section 8 Housing Choice Voucher holders. In the northern and western areas of the County, the opposite is true. Landlords can oftentimes charge more money for Section 8 Housing Choice Voucher holders than they would get from a regular market rate rental unit.

The most immediate needs of residents of Public Housing are basic life skills, economic independence programs, childcare, literacy, and youth/teen services.

How do these needs compare to the housing needs of the population at large

There is a lack of affordable housing units in the County which is similar to the housing needs of the population at large.

Discussion

The Section 8 Housing Choice Voucher Program is administered by the Orange County Human Rights, Housing, and Community Development Department. There are no existing public housing units, only Section 8 Housing Choice Vouchers. There is a separate public housing program administered by the Town of Chapel Hill. There are public housing units in Chapel Hill and Carrboro. These public housing units are managed and administered by the Chapel Hill Office of Housing and Community Development.

Attached to this plan are maps that show the location of Section 8 Housing Choice Voucher holders.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

The Orange County Partnership to End Homelessness coordinates the efforts of homeless service providers and social service agencies throughout the County and is structured into five (5) main components:

- The Leadership Team of the Orange County Partnership to End Homelessness serves as its board of directors and is responsible for broad policies, initiatives and decisions for Orange County's CoC. Recently this has included updating our Plan to End Homelessness and developing strategies for communicating about the work of the Partnership, a communitywide approach for addressing panhandling and street homelessness and a Homeless Housing Needs Assessment requesting additional local government funding for RRH and PSH. It also oversees each of the 6 subcommittees of the Partnership that work to increase access to housing, employment, benefits and services and to educate the public about the issues of homelessness.
- The 100,000 Homes Taskforce is responsible for achieving most of the services-related goals and strategies of the Partnership's Plan to End Homelessness and comprises representatives from health, behavioral health, substance abuse treatment, veterans, social services, street outreach, housing, and shelter providers, law enforcement and the UNC School of Social Work. The committee maintains a list of the most vulnerable and chronically homeless people in our community, assesses their needs through its vulnerability assessment tool and actively collaborates to connect them with housing and services. The Taskforce also oversees the annual PIT Count and works to increase services for the homeless including the number of SOAR workers.
- The Housing Workgroup is responsible for achieving the housing-related goals and strategies of the Partnership's Plan to End Homelessness; the committee comprises representatives from homeless housing nonprofit and government agency providers (ES, TH, PSH and RRH). Its top priorities currently include: expanding RRH capacity; developing a coordinated assessment system; developing more PSH and affordable rental units; increasing targeted exits from PSH to permanent housing and creating/strengthening local discharge agreements. The committee is also responsible for CoC and ESG grant applications, overseeing and measuring the performance of HUD-funded projects, HMIS participation and data collection and analysis.
- The Job Partners Workgroup is responsible for helping to develop and for achieving the employment-related goals and strategies of the Partnership's Plan to End Homelessness. The committee comprises representatives from employment, job training and education providers, foster care system, business community, chamber of commerce and local government. In 2012 it began implementing the Job Partners Program which helps people experiencing or at risk of homelessness – with an emphasis on youth aging out of the foster care

system and people with criminal histories - become job-ready and find employment. The committee is also developing a proposal for a transitional employment program, possibly in the food production and/or food service sector.

- Outreach Court launched in 2012 becoming the first court in NC to offer people experiencing homelessness who have committed misdemeanor crimes the opportunity to follow individual treatment plans and have charges dropped instead of going to jail. It was developed by the Partnership to End Homelessness based on similar courts throughout the country as well as Drug Court and Community Resource Court models. Outreach Court Committee members include court system representatives, UNC School of Law students, police officers and mental healthcare and substance abuse treatment providers. The committee meets before the monthly Outreach Court to review the docket, discuss participants' progress and strategize about helping them to succeed.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	28	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	20	81	0	0	0	0
Chronically Homeless Individuals	13	12	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	1	11	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	1	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

In Orange County, the number of persons existing in homelessness is expected to increase as housing affordability becomes more of an issue. Those who would traditionally be able to leave homelessness, are not able to afford more permanent housing. Those on the verge of homelessness are less likely to be able to afford their current housing situation. Despite homeless providers' efforts, the housing market has proven to be a barrier to stable affordable housing.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	27	14
Black or African American	71	5
Asian	0	0
American Indian or Alaska Native	0	1
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	10	1
Not Hispanic	99	19

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the information provided from members of the Orange County Partnership to End Homelessness (the Continuum of Care), it is estimated that 28 families with children are in need of housing assistance. All of these families are sheltered. There are no households or individuals who are considered "youth" or "children living alone" that are homeless.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

A total of 76 Black/African American individuals are experiencing some type of homelessness within Orange County. This compares to 34 individuals identifying as White and 11 individuals who identify as Hispanic/Latino who are experiencing some type of homelessness. Black/African Americans represent 58.9% of the homeless population but only represent 12.2% of the total population of Orange County. This signifies that Black/African Americans are disproportionately affected by homelessness in Orange County.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

There is a need for both shelter and unsheltered facilities. There are no families with children that are unsheltered. There is also a need for emergency shelters in Orange County, especially for men.

Discussion:

The Orange County Partnership to End Homelessness provides a wide range of services to the homeless of Orange County. Efforts to reduce the number of homelessness in the County involve a coordination of

shelters, mental health services, social services, governments, housing services, schools, and health services.

With the increasing cost of housing in Orange County, homelessness will likely become more pervasive as individuals who are barely able to afford their housing will no longer be able to afford to live where they currently reside. Affordable housing options that are decent, safe, and sanitary are rare in Orange County.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

The assessment of non-homeless special needs includes the following:

- Elderly persons (age 62 years and older)
- Frail elderly
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug additions
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

The housing need of each of these groups was determined by consultation with social service providers and statistical information provided by social services providers.

Describe the characteristics of special needs populations in your community:

- **Elderly Persons** are defined as persons who are age 62 years and older. According to the 2007-2011 American Community Survey Data, elderly persons represent 12.1% of the County's total population. Approximately 20.66% of the elderly population are age 80 years and older. In addition, roughly 20.2% of the total elderly population lives alone as a single person household.
- **Frail Elderly** are those persons who are elderly and have a form of disability, ranging from a hearing loss, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. It is estimated that approximately 16% of the total elderly population are frail elderly.
- **Persons with mental, physical and developmental disabilities**, according to the ACS data for 2007-2011, comprise 8.4% (11,180 persons) of Orange County's total population and are classified as "disabled."
- **Persons with HIV/AIDS and their families** comprise a small percentage of the County's overall population. According to the North Carolina Department of Health and Human Service, HIV/AIDS Surveillance Report, as of December 31, 2014, there were 16 Living HIV/AIDS cases in the County. As of the same time period, there were 12 cases of people living with Stage 3 HIV/AIDS. Males are disproportionately affected and the HIV/AIDS population is still growing in numbers.
- **Victims of Domestic Violence, dating violence, sexual assault and stalking** is rapidly increasing both locally and nationally. Based on crime statistics and social service agency response, it can be estimated that approximately 150 single person households and family households are victims of domestic violence, dating violence, sexual assault and stalking.

What are the housing and supportive service needs of these populations and how are these needs determined?

Based on resident surveys, stakeholder interviews, roundtable discussions, data analysis, and public meetings, the following needs were estimated for the non-homeless special needs population:

- **Elderly Persons** - 450 housing units
- **Frail Persons** - 200 housing units
- **Persons with Mental, Physical and Developmental Disabilities** - 150 housing units
- **Persons with HIV/AIDS and their families** - 5 housing units
- **Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking** - 150 housing units

According to the Orange County Master Aging Plan, "Orange County's older adult population is expected to increase dramatically over the next 20 years. Many seniors will struggle to stay in homes that are not designed to accommodate their changing needs. Seniors must anticipate and adapt to the changes associated with aging.

As part of the Master Aging Plan, Orange County aims to offer an array of housing options that reflects the diverse preferences and abilities our older adult population portrays. Orange County needs to conceptualize a continuum of housing types to accommodate rapid growth in its senior population and then, invest in development of preferred housing models.

To accomplish this aim, the Department on Aging has

1. conducted an inventory of current models of senior housing,
2. engaged in research to understand the types, prevalence, costs, and availability of housing currently available in the County and
3. surveyed Orange County seniors to understand their housing preferences."

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

As of December 2014 it is estimated that there are a total of 16 individuals diagnosed with HIV/AIDS in Orange County. There are no statistics available for the Metropolitan Statistical Area.

Discussion:

The needs for these various groups of the Special Needs Population are only estimates, based on HUD data, U.S. Census Data, ACS data and interviews with housing providers and social service agencies. Accurate statistics are not available for all of these groups, so therefore "best estimates" are presented.

While many supportive service providers for the special needs population are located in Orange County, their service area and clients are in the whole region.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Orange County is located in the Piedmont Area of North Carolina. The County is predominately rural with an agricultural economy. However, there are several small urban centers located in the South-Eastern portion of the County, including: Chapel Hill, Carrboro, and Hillsborough. These urban centers have a large concentration of homeownership and wealth. In these areas, the disparity in income between the low-income and high-income households is great. Outside these areas the difference is even greater as many of the County's poorest households reside in the rural areas in the northern part of Orange County. Most of the services, including public transportation, schools, and social services, are also concentrated in the urban areas.

Only 7.6% of all housing units were built before 1950, which is over 60 years ago. Between 1980 and 2000 there was a housing "boom" in the County with 21,797 units built, which is 39.4% of all the housing in the County.

According to 2007-2011 American Community Survey Data, the County now has 30,603 owner-occupied housing units (60.2% of all occupied housing units) and 20,234 renter-occupied housing units (39.8% of all occupied housing units).

The condition of the owner occupied housing stock is fairly sound. However, rental housing units range from fair to poor. Many of the higher quality rental housing units are located in the urban centers and close to the universities. The lower quality rental housing units are located in the rural areas. Improved code enforcement is needed to address these housing deficiencies. According to the ACS data for 2007-2011, there are 4,478 vacant housing units in the County, which is approximately 8.1% of all the housing units. This is much less than the housing vacancy rate of North Carolina, which is 14.5%. The median home value as of 2011 was \$270,300 and the median contract rent was \$840/month for the same time period.

Attached to this Plan are maps which illustrate Orange County's housing, renter housing unit, homeowner housing unit, and vacant housing unit concentrations.

MA-10 Housing Market Analysis: Number of Housing Units - 91,410, 91.210(a)&(b)(2)

Introduction

According to the 2007-2011 ACS data, there are 55,315 total housing units. There are 50,837 occupied housing units (30,603 owner-occupied and 20,234 renter-occupied), which leaves 8.1% vacant housing units. The majority of the owner-occupied housing are 3 or more bedrooms (83% of all owner-occupied houses). The majority (74%) of all renter-occupied housing units are 1 to 2 bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	31,677	56%
1-unit, attached structure	2,701	5%
2-4 units	4,276	8%
5-19 units	8,838	16%
20 or more units	4,224	8%
Mobile Home, boat, RV, van, etc	4,372	8%
Total	56,088	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	337	2%
1 bedroom	521	2%	5,233	26%
2 bedrooms	4,705	15%	9,798	48%
3 or more bedrooms	25,941	83%	5,103	25%
Total	31,167	100%	20,471	101%

Table 28 – Unit Size by Tenure

Data Source: 2007-2011 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The following number of units in Orange County that are assisted with Federal, State and Local Programs is as follows:

- **Public Housing** - 336 housing units of which 35 are elderly units and 301 are family units. The income levels are at 80% and below AMI.

- **Housing Choice Vouchers** - 613 vouchers that are tenant based and none are Veterans Affairs Supportive Housing (VASH). The income levels are at 80% and below AMI.
- **First Time Home Buyers** - The County has assisted numerous households with downpayment assistance to purchase a home since 2002. The income levels are at 80% AMI or below.
- **Habitat for Humanity** - has built 250 new homes in Orange County with County. The income level is at 65% and below AMI.
- **LIHTC Housing** - There are 11 LIHTC housing developments in the County with a total of 507 units. Since 2010, there have been 2 LIHTC housing development projects in the County with a total of 134 units.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are no affordable housing units which are anticipated to be lost and there are no Section 8 Contracts that are anticipated to expire.

Does the availability of housing units meet the needs of the population?

There are 30,603 owner-occupied housing units, 20,234 renter-occupied housing units, and approximately 4,478 vacant units. Of the vacant units, approximately 1,785 (39.9%) are for rent and 712 (15.9%) are for sale. The problem for the low- and moderate-income households is the "affordability" and "quality" of units in the County. Moderate-income households also have a difficult time affording good quality housing in Orange County. See map of vacant housing units for the location of vacant housing units.

Describe the need for specific types of housing:

The elderly population of Orange County (age 62 and above) is 15,979 persons which represents 12.1% of the total County's population. However, there are 200 assisted rental housing units designed for the elderly out of a total of 20,234 renter-occupied housing units which is 1.0% of the renter-occupied units. As the County's population ages in place, there will be less available elderly units and a higher demand for those units. It is estimated that 450 new affordable housing units for the elderly are needed. There is also a lack of "accessible" housing units in the County to address the needs of the physically disabled. Not including elderly housing units, it appears that there is a need for 150 housing units that are accessible to persons with physical disabilities. Presently, there are 84 accessible housing units for the disabled in LIHTC Projects.

Discussion

There is a continuing need for "affordable" and "accessible" housing in Orange County. The existing housing is sound and there appears to be an adequate supply of market-rate housing. The County has a growing population, and new construction and rehabilitation work is increasing again as evidenced by the

number of building and renovation permits issued throughout the County. Real estate values continue to rise which benefits property owners and most homeowners. However, these rising real estate values negatively impact very low-, low-, and moderate-income households who are increasingly cost-overburdened in their homes.

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

The value of housing value has fluctuated throughout the last 10 years; increasing to a median sales price of \$250,000 in 2007, plateauing until 2011, declining to \$230,000 in 2012, and then increasing to over \$260,000 in 2015. According to Zillow's website on the housing market in Orange County, the median sales price in recent months is just over \$263,000. In 2000, based on the 2000 U.S. Census, the median home value was \$179,000 which has increased to \$270,300 according to the 2007-2011 ACS data. An increase in the median contract rent (from the same sources) also occurred. Median rent rose from \$684/month to \$840/month. Over half (64%) of all rental housing units were in the \$500 to \$999 category per month.

According to Zillow.com there were roughly 1,126 housing units listed for sale as of March and the median sales price is reported at \$254,900. The website also reported that, "The median home value in Orange County is \$254,900. Orange County home values have gone up 2.7% over the past year and Zillow predicts they will rise 3.5% within the next year. The median list price per square foot in Orange County is \$155, which is higher than the Durham Metro average of \$125. The median price of homes currently listed in Orange County is \$350,000 while the median price of homes that sold is \$251,600. The median rent price in Orange County is \$1,295, which is higher than the Durham Metro median of \$1,171."

Mortgage delinquency is the first step in the foreclosure process. This is when a homeowner fails to make a mortgage payment. The percent of delinquent mortgages in Orange County is 2.6%, which is lower than the national rate of 6.4%. With U.S. home values having fallen by more than 20% nationally from their peak in 2007 until their trough in late 2011, many homeowners are now "underwater" on their mortgages, meaning they owe more than their home is worth. The percent of Orange County homeowners "underwater" on their mortgage is 8.5%, which is lower than the Durham Metro Area at 12.3%."

In regard to housing affordability, 3,862 renter housing units were affordable to persons with 50% or less of their Housing Affordability Median Family Income (HAMFI). For home owners, there were only 1,506 housing units that were affordable to households with 50% or less HAMFI.

The monthly FMR's for Orange County are within the HUD HOME Rents range (between High and Low HOME Rents) for one (1) bedroom apartments. The monthly FMR for Orange County was below the HUD HOME Rents range (below both High and Low HOME Rents) for efficiency apartments, two (2) bedroom apartments, three (3) bedroom apartments, and four (4) bedroom apartments.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	179,000	270,300	51.0%
Median Contract Rent	684	840	22.8%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,869	18.9%
\$500-999	13,127	64.1%
\$1,000-1,499	2,418	11.8%
\$1,500-1,999	671	3.3%
\$2,000 or more	386	1.9%
Total	20,471	100.0%

Table 30 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,019	No Data
50% HAMFI	3,862	1,506
80% HAMFI	13,103	4,010
100% HAMFI	No Data	6,050
Total	17,984	11,566

Table 31 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	573	708	839	1,082	1,267
High HOME Rent	575	721	843	1,087	1,238
Low HOME Rent	575	648	782	904	1,008

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Based on the HUD - CHAS data there is not sufficient housing for all income levels. The very poor and the poor are cost overburdened. This is especially the case with those who are renter households.

How is affordability of housing likely to change considering changes to home values and/or rents?

Due to the increase in property values, housing is likely to become even less affordable for lower income households. An increase in property values does not only affect those who own homes, it also adversely affects those who are renters. Landlords are likely to charge more money to cover an increase in property costs/taxes.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to "Rentometer," it is estimated that the area's median rent for a one-bedroom unit is \$700, and \$841 for a two-bedroom unit.

The Final FY 2014 monthly Fair Market Rents (FMRs) for the Durham-Chapel Hill, NC HUD Metro FMR Area are as follows: Efficiency, \$575; One-Bedroom, \$711; Two-Bedroom, \$843; Three-Bedroom, \$1,087; and Four-Bedroom, \$1,273.

The HUD Low and High rent limits for the Durham-Chapel Hill, NC HUD Metro FMR Area are as follows: Efficiency, \$575 (low) - \$575 (high); One-Bedroom, \$648 (low) - \$721 (high); Two-Bedroom, \$782 (low) - \$843 (high); Three-Bedroom, \$904 (low) - \$1,087 (high); and Four-Bedroom, \$1,008 (low) - \$1,238 (high).

This difference suggests that HUD's FMRs are priced slightly above the market rental rate. This gives landlords an incentive to rent to Section 8 Housing Choice Voucher Holders as they can charge slightly above the market rental rate. However, this is Countywide, where the market rents in the rural areas are lower than the FMRs, and in the urban areas, the market rents are well above the FMRs.

Discussion

Housing values (both rental and real estate values) have increased with the increase of households to the area. This increase has been especially burdensome on low- and moderate-income renter households. A decrease in the quality and the quantity of affordable rental housing has placed many of the very low-income households at imminent risk of becoming homeless.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

Orange County contains 3,471 housing units which were built prior to 1950. This represents only 6.7% of the total occupied housing units in the County. 19.1% of all occupied housing units were built within the last ten years. Of the 51,638 total housing units in the County, 17,610 (34.1%) housing units have at least one "selected condition." In addition, 20,899 housing units (40.5%) were built before 1980, and therefore have a potential lead-based paint hazard.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":

The following definitions are used in the jurisdiction:

- "Selected Housing Condition" - Over-crowding (1.01 or more persons per room), lacking a complete kitchen, lack of plumbing facilities, and/or other utilities, and cost over-burden.
- "Substandard condition" - Does not meet code standards, or contains one of the selected housing conditions.
- "Suitable for Rehabilitation" - The amount of work required to bring the unit up to minimum code standard, and the existing debt on the property, together are less than the fair market value of the property.
- "Not Suitable for Rehabilitation" - The amount of work required to bring the unit up to minimum code standard exceeds the fair market value of the property after rehabilitation work is complete.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	7,225	23%	9,743	48%
With two selected Conditions	122	0%	519	3%
With three selected Conditions	1	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	23,819	76%	10,209	50%
Total	31,167	99%	20,471	101%

Table 33 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	7,097	23%	2,766	14%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1980-1999	13,208	42%	7,668	37%
1950-1979	8,975	29%	8,453	41%
Before 1950	1,887	6%	1,584	8%
Total	31,167	100%	20,471	100%

Table 34 – Year Unit Built

Data Source: 2007-2011 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	10,862	35%	10,037	49%
Housing Units build before 1980 with children present	3,567	11%	1,331	7%

Table 35 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

It is estimated that there are approximately 1,600 housing units that are suitable for rehabilitation work in Orange County. However, the cost of rehabilitation exceeds the income and assets of many low- and moderate-income persons. Therefore, many of these housing units will remain vacant, substandard and deteriorating conditions since the financial resources are not available to rehabilitate the housing units. There is a need for increased Federal, State, local, and private funds to provide financial assistance to lower income families to rehabilitate properties for more affordable housing.

There is also a significant need for the rehabilitation of renter occupied housing units. Many of these rental housing units are owned by an individual who lives outside of Orange County and is not responsive to tenant's needs. There is also need for increased code enforcement.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

In determining decent, safe, and sound housing conditions, one needs to look at the environmental quality of these housing units. Lead based paint is one of the most significant environmental factors negatively affecting residential housing units. In 1978, lead was banned from residential paint; more than half of the total housing stock in the United States contains some lead based paint. It is estimated that 20 million housing units contain lead hazards, which include flaking or peeling lead based paint and excessive levels of tiny lead particles in household dust.

HUD estimates that 3.8 million homes containing such immediate lead hazards are occupied by families with young children who are at immediate risk of lead poisoning. Half of these families own their homes and of those, half have incomes above \$30,000 per year.

Lead-based paint in residential housing can cause severe health risks for children. HUD provides a general formula to estimate the potential presence of lead-based paint (LBP) in housing built prior to 1979, before lead based paint was banned in the United States.

For Orange County, it is estimated that 15% of low or moderate income families living in owner-occupied units are at risk of lead-based paint hazards and that 25% of low or moderate income families living in rental units are at risk of lead-based paint hazards.

Discussion

The reported cases of childhood lead poisoning in Orange County are low. State Health Department estimates emphasize that the number of unreported/undetected cases of childhood lead poisoning is unknown, and the low number of reported cases should not be misconstrued as evidence that lead poisoning is not more widespread.

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant based rental assistance, and property acquisition – supported by the CDBG program. Orange County will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

The Orange County Housing Authority Board operates the Section 8 Housing Voucher Program. The program provides approximately 623 vouchers to low income families. The Orange County Board of Commissioners appoints a seven member Housing Authority Board who serves as the governing board and the managerial affairs of the County conform to applicable County ordinances and policies.

The Chapel Hill Department of Housing and Community Development mission is to "Provide decent, safe, and affordable rental housing to Chapel Hill's public housing families." The Department manages 336 public housing units in Chapel Hill and Carrboro.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
# of units vouchers available	0	0	336	623	24	599	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments. Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The supply of public housing development includes 336 units at thirteen (13) different sites; twelve (12) located in Chapel Hill and one (1) in Carrboro. All units are in standard physical condition.

Public Housing Condition

Public Housing Development	Average Inspection Score
AMP 1	87
AMP 2	92

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Comprehensive Renovation has been completed on nine of the thirteen (13) developments; Airport Gardens, Trinity Court, Craig-Gomains, Lindsay Street; Pritchard Park, South Roverson, Colony Woods West, and North Columbia. The remaining four developments are scheduled for comprehensive renovation in this order; Oakwood, Eastwood, Church/Caldwell Street and Rainbow Heights.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Public Housing strategy for improving the quality of assisted housing is to improve the public housing management (PHAS score) and achieve a higher performance rating by June 30, 2016. Also, renovate or modernize public housing units. We will continue to implement measures to deconcentrate poverty by bringing higher income households into lower-income developments.

Discussion:

There is a dire lack of affordable housing for the very-low income in Orange County. Unfortunately, there are no new funding sources for permanent housing that replaces Public Housing to meet the housing needs of the very-low income. The County should encourage and support private and non-profit development entities to build more LIHTC high quality affordable housing developments throughout the County, especially in the urban areas (though in urban areas cost and the lack of available land make this almost prohibitive).

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

The Orange County Partnership to End Homelessness is Orange County's Continuum of Care. In addition to coordinating efforts to preventing and combatting homelessness, the Orange County Partnership to End Homelessness collects and analyzes data from the Point In Time counts in addition to HMIS data to monitor and evaluate the performance of funded projects. The key elements reviewed include number served, cost per outcome, leveraged funds in the project, expenditure rates and housing stability outcomes.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds Current & New	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds		Current & New	Under Development
Households with Adult(s) and Child(ren)	64	22	30	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities Targeted to Homeless Persons

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are several mainstream services available to the homeless in Orange County including the following:

- **Health Care** - University of North Carolina, Cardinal Innovations Healthcare Solutions/PBG, Community Care of North Carolina
- **Mental Health Services** – Orange County Health Department, Central Regional Hospital, UNC Hospital Psychiatric unit, Center for Behavioral Healthcare, UNC Center of Excellence in Community Mental Health
- **Social Services** – Orange County Department of Social Service, IFC, Tenn Youth Councils, Street Scene Teen Center, Helping Youth Providing Enrichment, Kappa Alpha Psi,
- **Educational** – University of North Carolina
- **Rental Assistance** – Mayor's Affordable Rental Housing Task Force in Chapel Hill, Orange County HOME Consortium, Housing for New Hope
- **Shelter** – Inter-Faith Council

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Orange County has a community health clinic and UNC Hospital System are relatively inexpensive. However, there is still a need for more free healthcare for people experiencing homelessness or at risk of becoming homeless. Over the past 10 years, mental health care reform in North Carolina has decimated low-cost mental health care and case management. There is a great need for Mental Health and Substance Abuse case management and treatment for people experiencing and at risk of homelessness. The Community Empowerment Fund (CEF) fills a great need for relationship based, client-centered job-readiness, job search, and life skills services. CEF will launch an Integrated Service Center in Chapel Hill in 2015 but needs support from local government and homeless housing and service partners to build its capacity. Orange County Employment Services need to increase focus and resources to assist this population, including people with criminal histories and youth aging out of foster care.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

Orange County has identified the priorities for services and facilities for its special needs population. This includes the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The following needs and objectives are established under this Five Year Consolidated Plan:

- **Elderly** - rehabilitation of existing owner-occupied housing units, and construction of new affordable and accessible apartments
- **Frail Elderly** - construction of new affordable and accessible apartments with supportive services
- **Persons with Disabilities** - rehabilitation of existing housing units for accessible improvements, reasonable accommodations to rental housing units, and supportive employment opportunities
- **Alcohol and Other Drug Addictions** - supportive services to end addictions, and training to re-enter the work force
- **Public Housing Residents** - housing downpayment assistance, job training and job opportunities, housing counseling for home ownership, and assistance in finding affordable housing
- **Victims of Domestic Violence** - additional temporary shelters, supportive services and training programs, and permanent supportive housing options

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Orange County Partnership to End Homelessness' 100,000 Homes Taskforce is comprised of approximately twenty (20) housing and service providers that interact with people who are chronically and/or vulnerably homeless, many with disabilities. The CoC uses its Coordinated Entry system to assess their needs, score their level of need, and prioritize them for Permanent Supportive Housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Not Applicable.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The Orange County HOME Consortium proposes to undertake the following activities to address housing and supportive service needs for the non-homeless other special needs population:

Goals/Strategies:

- **SN-1 Housing** - Increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, persons with disabilities, and persons with other special needs through rehabilitation of existing buildings and new construction.
- **SN-2 Social Services** - Support social service programs and facilities for the elderly, persons with disabilities, and persons with other special needs.
- **SN-3 Accessibility** - Improve the accessibility of owner occupied housing through rehabilitation and improve renter occupied housing by making reasonable accommodations for the physically disabled.
- **SN-4 Elderly Housing** - Develop housing strategies and options for older adults to age in place including those over housed and or priced out due to market forces, maintenance and other uncontrollable costs and promote and develop a range of affordable housing design choices and locations that allow them by choice to remain in the community.

ATTACHMENT - 5

11.0 (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights) are attached.

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or ___ Annual PHA Plan for the PHA fiscal year beginning _____, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

PHA Name

PHA Number/HA Code

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20_____

_____ Annual PHA Plan for Fiscal Years 20____ - 20_____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)**

Name of Authorized Official	Title
Signature	Date

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan**

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011**

**Certification by State or Local Official of PHA Plans Consistency with the
Consolidated Plan**

I, Click to Enter Official's Name the Click to Enter Official's Title certify that the Five Year and Annual PHA Plan of the Click to Enter HA Name is consistent with the Consolidated Plan of Click to Enter Jurisdiction Name prepared pursuant to 24 CFR Part 91.

Signed / Dated by Appropriate State or Local Official

ATTACHMENT - 6

11.0 (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. Comments received from Resident Advisory Board(s) during the community input process and responses will be included here.

ATTACHMENT - 7

11.0 (g) Challenged Elements. Any element(s) of the PHA Plan that is challenged during the community input process will be included here.