

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	<p>PHA Name: <u>Alexandria Redevelopment & Housing Authority</u></p> <p>PHA Code: VA0004</p> <p>PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA</p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/ 2021</p> <p>PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)</p> <p>Number of Public Housing (PH) Units <u>754</u> Number of Housing Choice Vouchers (HCVs) <u>1938</u></p> <p>Total Combined Units/Vouchers <u>2692</u></p> <p>PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p>

ARHA's Public Outreach:

This Notice was listed on both the City of Alexandria and ARHA's websites, as well as, posted in the lobby of ARHA. Resident Associations were contacted either via mailed notice or directly contacted in person. Due to Covid-19 restrictions the local libraries are closed, however this notice has been emailed to City of Alexandria braches, Charles E. Beatley and Kate Waller Barret.

Notice:

ALEXANDRIA REDEVELOPMENT & HOUSING AUTHORITY
PUBLIC NOTICE

DATE: August 14, 2020
TO: GENERAL PUBLIC AND INTERESTED PARTIES
SUBJECT: ARHA'S 2021 ANNUAL AGENCY PLAN (DRAFT)

Due to safety issues presented by the current Covid-19 pandemic, a "remote" public hearing will be held by conference call to discuss the Alexandria Redevelopment & Housing Authority's (ARHA) FY 2021 Annual Agency Plan. The Annual Agency Plan will be made available on the ARHA website, and it will be provided either by mail and/or email upon request. ARHA will also be providing a time frame for public comment.

The FY 2021 Annual Agency Plan public hearing conference call will be held on September 14th from 2:00 pm to 3:00 pm. During the call, ARHA staff will be available to answers questions and receive comments. Those interested are encouraged to join the call.

Public Hearing Conference Call Information:

9/14/2020 – 2:00 pm to 3:00 pm
Dial-in: (602) 580-9651
Access code: 6533211

ARHA's FY 2021 Annual Agency Plan is now available at, www.arha.us. Questions and/or written comments may be submitted to ARHA by email to either, dkaffka@arha.us or jdiaz@arha.us through September 19th, 2020.

Written comments received by 5:00 p.m. September 19th, 2020 will, as appropriate, be addressed in the final version, and/or taken into account in the development of the next Five-Year Action Plan and/or One-Year Agency Plan. Interested parties will have an additional opportunity to comment on the Plan during the September 28th, 2020 ARHA Board of Commissioners meeting before the Board takes official action on the document. ARHA's Board of Director meetings that are open to the public, however currently due to the Covid-19 pandemic, all meetings are now "virtual". For information on how to access ARHA's public Board of Director meeting, please contact Cynthia Dickerson, Executive Assistant @ cdickerson@arha.us.

For further information or request reasonable accommodations, please call ARHA (703) 549-7115 extension 176.

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

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

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

Financial Resources:

<u>Sources</u>	<u>Planned</u>	<u>Planned</u>
1. Federal Grant (FY 2018)		
a) Public Housing Operating Fund	\$4,920,770	Public Housing
b) Public Housing Capital Fund	\$1,001,562	Public Housing
c) Hope VI Revitalization	0	
d) Hope VI Demolition	0	

e) Annual Contributions for Section 8 Tenant-Based Assistance	\$24,889,690	Section 8
f) Public Housing Drug Elimination Program (including technical assistance	0	N/A
g) Residents Opportunity and Self-sufficiency grants	\$120,112	FSS
h) Community Development Block Grant	0	N/A
i) HOME	0	N/A
j) Moderate rehabilitation	\$1,468,314	Section 8
Other Federal Grants:	0	N/A
2. Prior Year Federal Grants (unobligated funds)	0	N/A
3. Public Housing Dwelling Rental Income		
a) Income	\$1,501,876	Public
4. Other Income	\$130,336	Public
5. Non-Federal Sources (listed below)		
a) Business Activities/Component Units	\$6,128,117	Non-Federal
b) Interest Income	\$54,778	Non-Federal
c) State + Local	\$4,707,417	Non-Federal
Total Resources	<u>\$44,922,972</u>	
<input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management:		
Management Fees:		
The allowable management fees are as follows:		
Management Fees -	\$ 63.52 PUM	
Bookkeeping Fee -	\$ 7.50 PUM	
<u>Asset Management Fee -</u>	<u>\$ 10.00 PUM</u>	
Total -	\$ 81.02 PUM	
<input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management.		
<p>Currently, the Agency is divided into six (6) Departments; Asset Management which now includes, the Family Self-Sufficiency (FSS) program, Finance (includes IT), Development, Facilities & Modernization, Social Services, and Executive. ARHA's CEO continues to evaluate Agency operations and may make additional changes in the future.</p> <p>ARHA is governed by a nine-member Board of Commissioners, which is appointed by the Alexandria City Council to staggered four-year terms. The Chair and Vice-Chair positions are elected annually by the Board members. Since 1998, ARHA residents held a seat and have served on the Board of Commissioners. Residents are encouraged to apply for the open Board position, when it becomes available. The Board has</p>		

one staff person, the Chief Executive Officer (CEO). During the Covid-19 pandemic, the ARHA Board has been conducting meetings by conference call and has made arrangements for the public to call in.

Due to the Covid-19 pandemic, ARHA has implemented numerous changes to operations to ensure the safety of its residents and staff. ARHA Management closed the main office during Virginia's "Stay at Home" order. However, work did not stop. All ARHA staff were required to work from home. The Technology team was tasked with making this possible. All staff were given computers and scanners to take home, as well as, access to the ARHA network, and the Tenmast system. The Technology team recently updated the staff's computers and now everyone can converse via Microsoft TEAMS. This platform greatly enhances the Agency's capabilities to operate electronically utilizing various methods. Using this platform, staff can in "real-time" meet with each other, (via camera and microphone), view and simultaneously work on documents, and send instant messages to one another or to groups. The Technology team continues improve the Agency's' connectivity and capabilities both in ARHA's offices and for staff to work from home.

Currently we are now in Phase III of the "re-opening" of Virginia and the ARHA office is opened again to the public by appointment. Staff is now working in the office and from home. ARHA requires that all who enter the office wear a mask (staff included). Other safety measures have been implemented such as distance indicators (6 feet) on the floor, cubicles with easily cleaned surfaces to be used for appointments, visitor logs (in case contact tracing is needed), temperature checks, hand sanitizer stations, etc. These safety measures will stay in place until it is deemed safe to do otherwise.

ARHA's Maintenance Department's scope of work has been limited during the pandemic. As essential workers who cannot work from home, the maintenance staff has throughout the shutdown responded to emergency calls and prepared vacant units for occupancy. Recently, maintenance staff has begun adding additional work orders as the opening by "phases" continues in Virginia and the work is deemed "safe" to perform. The Maintenance staff was also the eyes and ears of the Agency during the most restrictive portion of the shutdown, as they checked on the elderly and disabled, and reported any issues they encountered while working on the various properties.

ARHA's Human Resources (HR) Director has provided daily informational reports regarding the pandemic to all ARHA staff. These reports contain both Federal and Commonwealth of Virginia notices and warnings, and other pertinent information regarding Covid-19. Topics include the current infection rate, how to stay safe, how to maintain mental health, etc. Also included are useful links to other sources of information. Many of the Agency's' staff members rely on these daily reports to keep informed. At this time, the Director of HR plans to continue providing the reports. In addition to daily updates on the pandemic, the HR Director continues to disseminate vital Agency information to staff regarding new policies and procedures, and provide access to multiple virtual trainings concerning benefits offered by the Agency.

Significant Amendment/Modification:

The Agency submitted an amendment to the FY 2020 Annual Agency Plan. To allow the Asset Management Department to put into effect the allocation of thirty-six (36) new Mainstream vouchers which were awarded to ARHA via NOFA, FR-6300-N-43 (FY 2019). The amendment included the submission of ARHA's new Mainstream Voucher Program chapter to be included in the Housing Choice Voucher Program (HCVP) Administrative Plan. Also, included in the amendment was an update of all waiting list preferences for all housing programs that ARHA administers. This included the addition of two (2) new preferences required to implement the Mainstream program: experiencing homelessness and currently a client in permanent supportive housing or a rapid rehousing project. ARHA's HCV Administrative Plan and the ACOP were updated to reflect these changes. The amended Plan and

attachments (updates to the HCVP Administrative Plan and ACOP) was submitted and approved by the ARHA Board of Commissioners, and by HUD in May, 2020.

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

ARHA complies with its obligation to promote the de-concentration of poverty in its covered housing developments. As mandated by, 24 CFR 903.1 and 903.2, ARHA adopted changes to its admissions policy by updating waiting list preferences, adopting site based waiting lists, and added policy for unit transfers.

A statement of ARHA's de-concentration policy and strategy is included as required by, 24 CFR 903.7(b), in its Admissions and Continued Occupancy Plan, (ACOP) Chapter 4, Applications & Waiting List pg. 13-15 The policy is attached (See Attachment I).

B.2 New Activities.

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

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Assistance under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

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

- Mixed Finance Modernization or Development

As part of the Agency redevelopment and repositioning efforts, ARHA will continue its Mixed-Finance, Mixed-Income efforts. In June 2019, ARHA submitted 11 Disposition applications to HUD under the Section 18 repositioning initiative to convert the currently designated public housing units at each property into Project Based Vouchers under Section 8 operating subsidies. As of June 2020, one application has been approved and four applications are outstanding. The status of the remaining applications should be known by September 2020. Once the final approvals are determined, ARHA will submit the balance of the non-Section 18 and non-RAD properties to HUD for conversion to project based assistance under the Voluntary Conversion program.

As part of the ARHA repositioning strategy, the following eight (8) sites will require approval of a Disposition Application in this 2018-2022 reporting period:

1. Ramsey Homes (AMP No. VA004000003) (HUD No. VA04-05): ARHA had a financial closing for this project in November 2018 and commenced construction of the new project. ARHA had previously received a Demolition and Disposition approval and a Mixed Finance Amendment approval from HUD. The redevelopment resulted in the demolition of a 15-unit public housing community, and the construction of 52 new units of affordable housing, which are currently under construction. Among the 52 affordable units, there are six public housing units. Once ARHA's Section 18 and RAD properties are finalized, the agency will convert the balance of Public Housing properties to project based assistance via Voluntary Conversion. The six public housing units at Ramsey Homes will be a part of this conversion process in 2021.

2. Ladrey High-Rise (AMP No. VA004000001) (HUD No. VA04-09): ARHA submitted a Disposition application to HUD under the Section 18 repositioning initiative in June 2019. As of June 2020, ARHA is still awaiting SAC approval. Also in June 2020, ARHA received Request for Qualification responses for Development Partners to redevelop multiple properties including Ladrey. Once the Board of Commissioners selects a short list of preferred developers, they will approve a timeline for the redevelopment of Ladrey High-Rise. At that time, ARHA and the selected development partner will submit a Mixed Finance Proposal. Once redeveloped using a mixed finance process, the 170 currently designated public housing units will become Project Based Vouchers with Section 8 operating subsidies. This approach will improve the living conditions of the current and future residents of this property by improving the quality of life of all the residents. ARHA may secure financing using LIHTC, FHA Loan Guarantees or other financing vehicles in order to substantially renovate the building. ARHA may utilize a design-build approach to expedite the renovation process, and will reduce the need for off-site relocation by holding some units vacant during construction as swing units. This approach will also limit the disruption to the lives of the seniors and disabled residing at Ladrey. In total, 170 public housing units will be impacted by ARHA's application to HUD.

3. Samuel Madden Homes (AMP No. VA004000003) (HUD No. VA04-03): Samuel Madden has been earmarked for redevelopment. ARHA submitted a Disposition application to HUD under the Section 18 repositioning initiative in June 2019. As of June 2020, ARHA is still awaiting SAC approval. Also in June 2020, ARHA received Request for Qualification responses for Development Partners to redevelop multiple properties including Samuel Madden Homes. Once the Board of Commissioners selects a short list of preferred developers, they will approve a timeline for the redevelopment of Samuel Madden. At that time, ARHA and the selected development partner will submit a Demolition application and Mixed Finance Proposal to HUD. After completion of each phase of redevelopment, ARHA would apply for Project Based Vouchers for the currently designated public housing units at the Samuel Madden Homes property. Under the redevelopment plan, we will create a mixed income community with increased density and a proposal

to increase the current number of affordable units that will be constructed on the site. Sixty-six public housing units are affected by this disposition.

4. Andrew Adkins (AMP No. VA004000003) (HUD No. VA04-08): Andrew Adkins has been earmarked for redevelopment. ARHA submitted a Disposition application to HUD under the Section 18 repositioning initiative in June 2019. As of June 2020, ARHA is still awaiting SAC approval. Also in June 2020, ARHA received Request for Qualification responses for Development Partners to redevelop multiple properties including Andrew Adkins. Once the Board of Commissioners selects a short list of preferred developers, they will approve a timeline for the redevelopment of Andrew Adkins. At that time, ARHA and the selected development partner will submit a Demolition application and Mixed Finance Proposal to HUD. Upon completion of each phase in the redevelopment of Adkins, ARHA would apply to convert the currently designated public housing units at the Andrew Adkins property into Project Based Vouchers with Section 8 operating subsidies. Under the redevelopment plan, we will create a mixed income community with increased density and a proposal to increase the current number of affordable units that will be constructed on the site. Ninety public housing units are affected by this disposition application to HUD.

5. Scattered Sites II (AMP No. VA004000004) (HUD No. VA04-11): During the 2018-2022 reporting period ARHA will submit a Disposition application under the Section 18 repositioning initiative and after redevelopment of the entire site convert the currently designated public housing units into Project Based Vouchers with Section 8 operating subsidies. We believe that submission of a Disposition application to HUD under the Section 18 repositioning initiative, implementation of a mixed finance redevelopment plan, and the conversion of 30 public housing units at this site into Project Based Vouchers under Section 8 operating subsidies will allow ARHA to improve the living conditions of the current and future residents by allowing a complete redevelopment of the property. During the reporting period, ARHA will undertake a master planning process and procure a development partner for the 30 units at Scattered Sites II, otherwise known as Cameron Valley. The redevelopment plan will follow the small area plan review currently being undertaken by the City of Alexandria and the transportation study of Duke Street, the major thoroughfare fronting this parcel. ARHA will combine to this property the adjacent 10 units on Yale Drive (as discussed below, ARHA will also seek a disposition of Scattered Sites I), which are contiguous with to the Scattered Sites II property. During the predevelopment process, ARHA will submit to HUD a Mixed Finance development proposal for approval. Thirty public housing units (at Scattered Sites II and 10 additional units at Scattered Sites I) will be impacted by ARHA's application to HUD.

6. Scattered Sites I (AMP No. VA004000004) (HUD No. VA04-10): The property known as "Scattered Sites I" is comprised of four different property clusters scattered over a 2 mile radius. In 2020 ARHA anticipates submitting a Disposition application to HUD under the Section 18 repositioning initiative to convert the 10 units currently designated public housing units at Yale Drive into Project Based Vouchers with Section 8 operating subsidies. These 10 units are located adjacent to the Scattered Site II property along Yale Drive discussed above. These 10 units will be combined with the above units to create a development parcel which includes 40 total public housing units. Once the Section 18 application is approved, ARHA will enter into a development proposal with a firm selected under the RFQ solicitation currently being considered. ARHA's goal is to develop a mixed income community on this site with a one-for-one replacement of all public housing units. ARHA has determined that repositioning of this property through a mixed income development with increased density will improve the quality of life of the residents of these properties and will improve the operations of the ARHA property portfolio.

The other forty units in Scattered Site I will be converted to project based vouchers utilizing the voluntary conversion rules. Fifty public housing units will be impacted by ARHA's application to HUD.

7. Scattered Sites III (AMP No. VA004000004) (HUD No. VA04-12) (41 ACC units): The property known as “Scattered Sites III” is comprised of five different address clusters spread out over a 2.5-mile radius. Scattered Sites III has a total of 41 public housing units. These units are located in nine building groups of four or five units each. ARHA plans to voluntarily convert these units to project based subsidies after converting other properties via Section 18 and RAD. ARHA has determined that repositioning through voluntary conversion will improve the quality of life of the residents of these properties and will improve the operations of the ARHA property portfolio. Forty-one public housing units will be impacted by ARHA’s application to HUD.

8. ARHA Administrative Office Building (600 N Fairfax Street): The Administrative Building has been earmarked for redevelopment. During the 2018-2022 reporting period, ARHA will submit a Disposition application and receive HUD approval to release the restrictive covenant off this property. In this way, ARHA will be able to combine this property with other ARHA properties to be redeveloped into a mixed income community. The disposition meets HUD’s criteria of non-dwelling buildings and vacant land as noted in PIH 2018-04 because the disposition of the property does not interfere with continued operation of the remaining portion of the project. No housing units will be impacted by this disposition.

Demolition and/or Disposition.

A major goal of ARHA is to use its resources in a manner that improves the quality of housing for the residents of ARHA’s public housing properties, while promoting economy of operation and efficiency in the discharge of its public function. For this reason, ARHA submitted or will be submitting Disposition Applications for the following properties pursuant to Section 18 of the US Housing Act of 1937, as amended, regulation 24 CFR 970 in the plan Fiscal Year.

1. Disposition Only of Park Place Condominiums (AMP No. VA004000004-Scattered Sites) (HUD No. VA04-16): ARHA owns 38 condominium units in a property known as Park Place. The condo building has a total of 403 units; 365 market rate condos and 38 condo units owned by ARHA. The high condominium fees paid by ARHA have made this project financially unfeasible as ACC units and have been a drain on agency resources. ARHA submitted a Disposition application under the Section 18 repositioning initiative in June 2019 that was accepted by SAC in March 2020. ARHA will apply for the Replacement Tenant Protection Vouchers (TPVs) and provide notice to the residents of the subsidy change. ARHA plans to preserve these 38 units as TPVs and project base them at a larger redeveloped site in the next 3-5 years. At that time, ARHA would work with the City of Alexandria’s Department of Housing to sell these units to first-time homebuyers or existing residents through a homeownership program. The goal is to preserve these units as affordable in the City of Alexandria and converting them to Section 8 subsidy will increase the operating subsidy and better serve the residents. Total ACC units affected will be thirty-eight.

2. Disposition Only of Saxony Square Condo: (AMP No. VA004000005-Scattered Sites) (HUD No. VA04-13): The five ARHA-owned ACC units are part of an overall garden style, walk up condominium community that is comprised of 264 units; the remaining 259 units are market rate, homeownership units. The high condominium fees have made this project financially unfeasible as ACC units. In June 2019, the Section 18 application was submitted to HUD to reposition these units. As of June 2020, ARHA has received positive feedback from SAC on the application and anticipates an approval in the next couple of months. Once the Section 18 application is approved, ARHA will apply for the Replacement Tenant

Protection Vouchers (TPVs) and provide notice to the residents of the subsidy change. ARHA plans to preserve these 5 units as TPVs and project base them at a larger redeveloped site in the next 3-5 years. At that time, ARHA would work with the City of Alexandria's Department of Housing to sell these units to first-time homebuyers or existing residents through a homeownership program. The goal is to preserve these units as affordable in the City of Alexandria and converting them to Section 8 subsidy will increase the operating subsidy and better serve the residents. Total ACC units affected will be five.

3. Disposition Only of Chatham Square (AMP No. VA004000006) (HUD No. VA04-917). The 52 units of public housing are scattered throughout the otherwise mixed income property of renters and home owners. ARHA owns the 52 units in fee simple and pays not only the operating costs, but also the HOA fees for common area expenses. The property needs to be repositioned in order to increase the net operating income. Moreover, the regulatory compliance period for the Low Income Housing Tax Credits (LIHTC) will expire in December 2020. ARHA will exercise its right of first refusal and acquire these units, secure 4% LIHTCs and re-syndicate the units. This re-syndication will result in additional capital that ARHA will use to reinvest to make necessary capital improvements in the units. Once the property is re-syndicated, ARHA will seek to either RAD the units or change the public housing units to Section 8 operating subsidies through a voluntary conversion of these units. The disposition will impact 52 public housing units.

4. Braddock, Whiting, Reynolds (AMP No. VA 004000007) (HUD No. VA04-918, VA04-919, VA04-920). The 48 public housing units at Braddock, Whiting, Reynolds (BWR) are scattered across 3 properties. Once ARHA's Section 18 and RAD properties are finalized, the agency will convert the balance of Public Housing properties to project based assistance via Voluntary Conversion. The 48 units at BWR will be included in that conversion process to improve the quality of life of the residents and improve the operations of ARHA's portfolio.

In 2021, the compliance period will expire for Low Income Housing Tax Credits (LIHTC) that were used in part to finance the construction of the 48 public housing units at the Chatham Square mixed income property. ARHA will exercise its right of first refusal to acquire the units from the existing limited partners. Thereafter, ARHA will form another partnership and re-syndicate the properties with additional LIHTC equity. The refinancing will ensure that the 48 units will have rent-restricted units for another fifteen-year compliance period.

Conversion of Public Housing to Project-Based Assistance under RAD

1. Consistent with the repositioning initiative that we have undertaken for all our properties funded with Section 9 operating subsidies, the following five (5) sites will be submitted for the RAD program. These properties were financed using Low Income Housing Tax Credits and have public housing residents. Except for routine maintenance and periodic replacement reserve projects, these projects have not had any substantial capital infusion. ARHA will reposition these properties by submitting a request for voluntary conversion via Section 18 or a RAD application in order to improve the quality of housing for ARHA residents, preserve the units as affordable into the future, and secure the capital funds that are required to make the major repairs that the property requires. ARHA is currently preparing the RAD subsidy only applications for these 5 properties. As part of the RAD application process, ARHA is reaching out to the residents for comments specifically on the RAD financing plan. Potentially one hundred and sixty four ACC units are impacted by the application to HUD.

	<ul style="list-style-type: none"> • Old Dominion (AMP No. VA004000008) (HUD No. VA04-921) (36 ACC units) • West Glebe (AMP No. VA004000009) (HUD No. VA04-922) (48 ACC units) • James Bland I (AMP No. VA004000010) (HUD No. VA04-923) (18 ACC units) • James Bland II (AMP No. VA004000011) (HUD No. VA04-924) (18 ACC units) • James Bland IV (AMP No. VA004000012) (HUD No. VA04-925) (44 ACC units)
B.3	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
B.4	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
B.5	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Expand and Preserve the Supply of Assisted Housing:</p> <p>During reporting period 2018-2022 ARHA will preserve the following properties:</p> <p>a) Chatham Square. In 2020, the compliance period will expire for Low Income Housing Tax Credits (LIHTC) that were used in part to finance the construction of the 52 public housing units at the Chatham Square mixed income property. ARHA will exercise its right of first refusal to acquire the units from the existing limited partners. Thereafter, ARHA will form another partnership and re-syndicate the properties with additional LIHTC equity. The refinancing will ensure that the 52 units will have rent-restricted units for another fifteen-year compliance period.</p> <p>b) Braddock, Whiting, Reynolds. In 2021, the compliance period will expire for Low Income Housing Tax Credits (LIHTC) that were used in part to finance the construction of the 48 public housing units at the Chatham Square mixed income property. ARHA will exercise its right of first refusal to acquire the units from the existing limited partners. Thereafter, ARHA will form another partnership and re-syndicate the properties with additional LIHTC equity. The refinancing will ensure that the 48 units will have rent-restricted units for another fifteen-year compliance period.</p>

- c) Ramsey Homes: In October 2020, 52 affordable units will be brought online at the former Ramsey Homes site. This property has been rebranded as Lineage on North Patrick. The Lineage property will contain 6 ACC units and 46 rent restricted units consistent with the rent structure for the LIHTC program. The former Ramsey Homes site contained only 15 public housing units on its footprint.

Improve the Quality of Assisted Housing:

ARHA submitted its Section 18 application in 2019 and is currently waiting for approval on all developments submitted. If approved later this year, the increased operating revenue generated from converting units from Section 9 operating subsidy to a project based Section 8 subsidy will allow the housing authority to address many capital items and routine maintenance repairs in many of its housing developments

Increased Assisted Housing Choices

- a) Ramsey Homes: Construction will be completed in October 2020 with full occupancy of the building to be achieved on or prior to December 31, 2020. This will make available 52 affordable units, including 6 public housing units. The additional 46 income restricted units will be available to income-qualified residents within the City of Alexandria that can accept Housing Choice Vouchers.
- b) ARHA is now administering its Mainstream Voucher Program. After updating the HCVP waiting list preferences to accommodate the new Mainstream vouchers, and opening the waiting list, applicants have submitted eligibility applications. ARHA staff is working closely with many applicant social services case workers to get the required documents needed in order to determine applicant eligibility. Currently at least 45 vouchers have been issued and 20 applicants have secured housing. In May, in response to the increased need for housing as a result of the current pandemic, HUD issued ARHA an additional 11 Mainstream Vouchers. ARHA’s goal is to have all 36 Mainstream Vouchers of the initial allocation, and the additional 11 vouchers issued by this fall. As more applicants find units to lease, ARHA will begin meeting with its social services partners to develop on-going resources for Mainstream residents.
- c) ARHA’s Portability program continues to be very active. ARHA staff counsels and helps prepare HCVP Tenants to “port” to other jurisdictions. To facilitate the Portability process, request forms are available at the front desk of the main office, and the forms have been made available by mail and/or email. Information on Portability is also provided during “in-house” intake briefings. Additionally, Portability information as well as a portability request forms are included in the Agency’s intake briefing packets.

- d) The Agency continues to administer the Homeownership Voucher Program. Currently there are 18 voucher families, who own their home. ARHA collaborates with the City of Alexandria's Department of Housing that offers funding programs that help with down payments and closing costs. So far this year, ARHA's voucher holders have not pursued buying a home. However, as the pandemic subsides, we are hoping this will change.

- e) The Agency continues to implement Small Area Fair Market Rents (SAFMRs) for the Housing Choice Voucher Program. Earlier in the year, ARHA released its 2020 SAFMRs which for the majority of zip-codes, has increased subsidy for voucher holders. Due to high rents in ARHA's jurisdiction many units have not been a feasible option for voucher holders. With the continued utilization of the SAFMRs, ARHA's voucher holders are now able to lease units in the City which offer higher opportunity and lower poverty. The use of SAFMRs is also central to ARHA's de-concentration goals as the Agency is always looking for ways to integrate subsidized housing with the City of Alexandria's more "affluent" market rate residential areas.

Improve Community Quality of Life and Economic Viability by Providing an Improved Living Environment

- a) The Ladrey High-Rise (Elderly & Disabled Housing)

This year's plans to improve the living environment at the Ladrey High-Rise (continued interior updates, offering in-house creative arts, computer, and exercise classes) had to be suspended in March when it became clear that the Covid-19 virus was in the City of Alexandria. In response to the outbreak, the Agency implemented a plan to secure the Ladrey building and its residents. The Ladrey High-Rise building which houses the Agency's most "at risk" groups for Covid-19, the elderly and disabled, was put on "24 Hour" security and the building is now closed to all non-essential visitors. The only people allowed to enter the building are residents, ARHA staff, essential care workers, and family on a case by case basis. All visitors are required to sign in/out and to provide their contact information in case contact tracing is necessary. In addition, the building's community spaces, such as the main meeting room, kitchens and bathrooms have been closed. Masks are mandatory for all staff, and residents when they are not in their own units. Cleaning supplies and PPE have also been made available. In May, ARHA teamed up with the City of Alexandria's Health Department to provide free Covid-19 testing to anyone at the Ladrey who wished to be tested. Plans are currently being made for additional testing in the near future.

The Ladrey High-Rise continues to be a high risk environment and the Covid-19 plan is still being implemented. Although the plan has been met with some resistance, ARHA's constant communication with Ladrey residents has facilitated a "team" sensibility when it comes to keeping the virus out of the building. As of this date, there have been no Covid-19 deaths, and an outbreak of the virus has thus far has been avoided. ARHA is committed to staying flexible when it comes to the continued implementation of current restrictions. The Ladrey building's pandemic plan will continue to be evaluated and altered as needed.

b) Covid-19 Help for ARHA Residents.

In response to the Covid-19 pandemic, the Agency continues to communicate frequently with residents to keep them informed of changes. Once it became apparent that a “stay at home” order was to be given for the area, ARHA rapidly devised, then implemented new processes/procedures to help ARHA residents cope with lost income. Notices were quickly sent to residents to inform them that anyone who lost their income could contact their Housing Specialist and have their rent adjusted. The Agency also implemented a "ban" on all evictions from March to the end of the year (2020). ARHA is committed to assisting residents who have not been able to pay all of their rent during this time frame. Residents who need help will receive referrals for local agencies known to help residents pay rent and utilities, and if necessary, they will be given the opportunity to pay what they owe via a repayment agreement.

To continue working efficiently and safely for all involved, new processes were implemented by the Asset Management Director. All in person appointments were halted and resident transactions were conducted by mail or electronically. In mid-March, the Asset Management and Technology teams researched electronic methods for document delivery. The Agency chose to use DocuSign, which provides an easy to use online platform that allows forms, application packets, etc. to be reviewed, filled out and signed electronically. To begin utilizing this new platform, all certification paperwork had to be reconfigured as fillable pdf. forms. Asset Management staff was then trained to use the platform. Now, Asset Management staff uses DocuSign to send out annual recertification packets, housing applications, and other required paperwork to those residents/applicants that have submitted their email addresses. We have, so far, had positive feedback from residents and applicants that have used the DocuSign platform. Moving forward, the Asset Management Department plans to continue using an electronic, online service for administering housing certifications and will work to increase the number of residents/applicants that use the platform to receive, complete, and return their housing paperwork.

ARHA is providing numerous essential services for our residents during the pandemic. In mid-March, regular food distribution provided to residents by the Capitol Area Food Bank was suspended due to potential virus spread. This left many residents who have relied on this service vulnerable to hunger and malnutrition. As the pandemic continued, new groups of ARHA residents also needed help with obtaining enough food for themselves and their families. This included residents that were no longer able to leave their homes to shop due to advanced age, pre-existing conditions, and the newly unemployed.

To meet the growing need for food, ARHA’s Social Services have teamed up with local organizations such as ALIVE, the Charles Houston Recreation Center, and multiple churches, charities, and shelters to provide safe food distribution to not only ARHA residents but to anyone in the City of Alexandria who needs food. ARHA has provided staff, resources, and distribution centers. At the beginning of the pandemic the only food available to residents were “shelf-stable” items such as rice, flour, sugar, canned goods, beans, etc. As additional partners were added, including local farmers and restaurants, perishable foods such as fresh produce, dairy products, poultry and meat are now available. Food distribution occurs twice a month and is distributed either by drive thru or walk up. In addition to direct food distribution, ARHA continues to receive

financial donations from local businesses and individuals which are then converted to gift cards and are given to residents in need of food and household supplies.

The Agency recently held a wide spread PPE distribution for all ARHA residents. ARHA staff handed out masks, gloves, hand sanitizer, and cleaning supplies at every ARHA property and office throughout June and July to accommodate those who wished to pick up supplies. For those that were not able to come to the distribution areas, ARHA staff delivered PPE supplies directly to their homes. The Agency is continuing to give out PPE and cleaning supplies when requested.

When schools were shut down and virtual learning was required, ARHA quickly realized that some families did not have internet access. To deal with this issue, ARHA's Social Services and Technology teams contacted the City of Alexandria's Public Schools to devise ways to get access to these children. Several methods were employed. The most prevalent being mobile vans containing the equipment needed to provide broadband network access for the student's computers and tablets. When the mobile vans did not work other methods were used until all ARHA school age students could continue their studies electronically. ARHA will continue to assist with providing this access as long as students are learning at home.

ARHA continues to identify pandemic related issues that affect residents. One of the most problematic issues is day care for children. ARHA is currently meeting with the City of Alexandria, local organizations, and day care providers to put together resources for working parents. This continues to be challenging and most likely there will not be one solution that fits all.

c) Resident Associations

The ARHA Resident Association (ARA) and the Resident Advisory Board (RAB) continue to be active in the community and with the Agency's management. Both associations meet on a regular basis and when necessary, bring their concerns to ARHA management. However, since the start of the pandemic all meetings have been conducted either electronically, or by conference call. In addition, ARHA resident associations have assisted with the development of all pandemic oriented services provided by the Agency, as well as, its members have been on the front lines as active participants in bringing these services to ARHA residents.

d) ARHA Community Engagement

ARHA is committed to keeping all ARHA residents informed of procedural changes and services offered. Multiple notices have been provided in response to the pandemic. Notice is provided via mail, email, and website, when warranted. ARHA staff will continue to be available to answer resident questions and concerns if they are working in the office or from home.

Asset Management Occupancy Specialists continue to be responsible for overseeing the housing developments to which they have been assigned. Specialists' on-site visits have been suspended for the time-being, but they continue to report on the status of each housing development, as best they can during the pandemic. The Specialist's report is submitted monthly to the Asset Manager Director, the Maintenance Department, and CEO (if severe enough). These reports allow ARHA to quickly react to any issues that have occurred and to be increasingly preventative when it comes to maintaining the property's building exteriors and common spaces.

Once it is determined to be safe, ARHA will continue to be a major contributing partner in many community events. Many of the activities that Agency usually participates in with the City of Alexandria, and numerous local organizations, such as, the annual Youth Arts Festival have been canceled due to the Covid-19 safety concerns. ARHA will remain flexible when it comes to holding activities such as Santa's Winter Wonderland. This event provides gifts and a visit with Santa to ARHA's children. This event is very popular with the community and is covered by local press. ARHA will be working on an alternative plan to distribute gifts if the Santa's Winter Wonderland event cannot be held this year. Other community events that ARHA holds yearly, such as, National Night Out will be cancelled.

Promotion of Self-Sufficiency and Asset Development

a) Training/Seminars

ARHA continues to make efforts to change the low-income level of many Public Housing and Housing Choice Voucher families. The Agency works toward increasing residents' job skills through the Social Services, Resident Opportunity & Self-Sufficiency (ROSS), and Family Self Sufficiency (FSS) programs. These programs not only offer case management of family needs and goals but they provide trainings on topics that include, Self-Development, Financial Literacy, Credit Repair, Obtaining Employment, etc. These training sessions are open to all ARHA residents and ARHA staff. Unfortunately, only a handful of seminars and trainings were able to be offered this year due to the pandemic. However, once it is deemed safe, ARHA will resume its normal seminar/training schedule. ARHA is currently exploring the possibility of offering ROSS and FSS resident trainings virtually. This is still in the development phase and hopefully will be offered in the fall of 2020.

The Social Services Coordinator for James Bland V residents (54 units) continues to conduct training on various topics, "Goal Objectives, Effective Communication", "Positive Thinking", "Budget Management", "Credit Restoration", "Employment Development", "and Life Skills-Self Esteem". Just as the ROSS and FSS programs above, trainings has been suspended but may resume virtually in the near future.

b) Family Self-Sufficiency Program (FSS)

ARHA continues to implement the FSS program for HCVP and Public Housing Residents. The FSS Coordinator, during the pandemic continues to meet with FSS participants via phone and email. The FSS Program has graduated two (2) Housing Choice Voucher and Public Housing participants so far this year and plans to graduate four (4) more by the end of 2020. All graduates have accrued escrow.

c) ROSS Program

ARHA continues to implement the ROSS program. The Program Director has been successful in developing resources to increase resident employment opportunities and self-sufficiency. ROSS participants have access to an ARHA maintained "Clothing Closet" which offers business attire for our residents attempting to find employment. ROSS program participants also attend the various self-improvement workshops held throughout the year at the Agency. Just as the other

programs listed above, all interaction with program participants is being done via phone and/or email and, unfortunately, training events usually provided have been suspended until further notice.

d) Intern Program

The Agency is providing summer and fall intern jobs for high school and college students on a limited basis due to the ongoing COVID pandemic. Interns work in a variety of ARHA departments (Finance, Asset Management, and Information Technology) and learn valuable work skills. Unfortunately, ARHA has had to suspend summer work for eligible teens in the “ARHA Summer Youth Program”. This program not only provides part-time employment but also offers educational “field-trips” in the area, and free breakfast and lunch daily. ARHA will offer this very popular program again in summer, 2021.

e) Elderly/Disabled Activities

ARHA continues to provide and attract supportive services for elderly and/or disabled residents through ongoing coordination with the City’s Department of Human Resources, which continues to fund, home health aides, the “Crunch Bunch” program, and provides access to the food bank and weekend meals program. Currently, many programs have been suspended due to the pandemic however, some activities are being held on a limited basis only.

f) Staff Training

ARHA staff continues to work with the City of Alexandria’s Department of Human Services and attends meetings and training on various topics. This year, in March, the City of Alexandria’s Health Department provided training on the Covid-19 virus. This was an extensive presentation, including scientific/medical information about the virus, as well as, how to stay safe. This presentation was attended by the majority of ARHA staff members. Staff was given time to ask questions and voice concerns.

ARHA staff continues to attend job/position specific trainings year round. Since March of this year all training attended have been virtual. ARHA staff recently attended a HUD training on the PIC system and the EIV. In addition, training has been held on new capabilities of ARHA’s Tenmast System and DocuSign platform. ARHA will continue to attend training as it become available.

Ensure Equal Opportunity and Affirm Fair Housing

ARHA always undertakes affirmative action to ensure access to housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, and gender identification pursuant to the most recent Admissions and Occupancy Plan and the Housing Choice Voucher Administrative Plan. ARHA Asset Management staff attends Fair Housing Training provided by the Commonwealth of Virginia on an annual basis. ARHA also ensures accessible housing for those with disabilities, and currently exceeds the required number of accessible units under the 504 guidelines. ARHA will include accessible units in the new Ramsey Homes Development and will continue to do so with all future redevelopment plans.

	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>See HUD Form 50075.2 approved by HUD 9/06/2018.</p>

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ARHA FY 2021 ANNUAL AGENCY PLAN

ATTACHMENT I

Comments:

Resident Advisory Board (RAB):

Submitted: 9/16/2020

Dear Sirs and Madams,

Denise Kaffka (Quality Assurance Specialist II) called a meeting to go over ARHA's FY 2021 Annual Agency Plan on September 14th 2020. Due to the current pandemic the meeting was held by conference call and was attended by several board members. In the meeting Ms. Kaffka discussed with us the updates in the new Plan as well as listened and responded to concerns and comments made during the meeting.

It has been a trying year with the pandemic however ARHA has done a very good of making sure its residents have stayed safe which the Plan goes over. We are also glad to hear that progress is being made in redeveloping ARHA's ageing properties. We know it is a long process and we are pleased that many of the projects are moving forward.

It was a very nice and informative meeting. We approve of this year's Annual Agency Plan.

Maudie Hines

Secretary of Ladrey Advisory Board/ Resident

ARHA Response to Comments:

ARHA held a public hearing on 9/14/2020 via conference call. Several RAB members and Ladrey residents were in attendance. The discussion primarily focused on what ARHA has done to provide for its residents during the current pandemic. Several attendees commented on the restrictions currently in place at the Ladrey building. Even though residents know that the restrictions are there to keep them safe, and they are grateful, they are looking forward to when they will no longer be necessary. Several attendees wanted to know about potential housing opportunities. The waiting lists were discussed as well as the new units soon to be available at the new Ramsey Homes, now rebranded as Linage and how to go about applying to live there. All participants are in agreement that the hour long meeting was informative and productive.

Denise Kaffka, Quality Assurance Specialist II

ARHA FY 2021 ANNUAL AGENCY PLAN

ATTACHMENT II

DE-CONCENTRATION

ARHA De-concentration Policy

(ARHA CHAPTER 4– Application & Waiting List, page 4-13-15, ACOP REV. 10/2016)

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

The PHA's de-concentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c) (5)].

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

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

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

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income,

provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

ARHA Policy

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

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

ARHA Policy

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

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

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether these developments are consistent with its local goals and annual plan.

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

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

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

A family has the sole discretion whether to accept an offer of a unit made under the PHA's de-concentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's de-concentration policy [24 CFR 903.2(c) (4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the de-concentration requirement and no further action is required.

ARHA Policy

For developments outside the EIR the ARHA will take the following actions to provide for de- concentration of poverty and income mixing:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives be considered in accordance with HUD requirements and ARHA Policy.

