

## 2024 PUBLIC HOUSING AGENCY ANNUAL PLAN Effective APRIL 1, 2024

Charleston-Kanawha Housing Authority 1525 Washington St., W. Charleston, WV 25387



**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

## Definitions.

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

А.	PHA Information.					
A.1	<ul> <li>PHA Type: Standard PH</li> <li>PHA Plan for Fiscal Year Be</li> <li>PHA Inventory (Based on An</li> <li>Number of Public Housing (</li> <li>Total Combined Units/Vouc</li> <li>PHA Plan Submission Type:</li> <li>Availability of Information.</li> <li>location(s) where the proposed</li> <li>available for inspection by the</li> <li>and main office or central offi</li> <li>encouraged to provide each re</li> <li>Charleston-Kanawha Housi</li> <li>office (1525 Washington St.</li> </ul>	HA Name:       Charleston-Kanawha Housing Authority       PHA Code:WV001         HA Type:       Standard PHA       Troubled PHA         HA Type:       Standard PHA       Troubled PHA         HA Plan for Fiscal Year Beginning:       (MM/YYYY):04/01/2024				
	PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)					
	<b>Participating PHAs</b>	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia		n Each Program
	Lead PHA:				PH	HCV

ements.						
ements.						
	Revision of Existing PHA Plan Elements.					
(a) Have the following PHA Plan elements been revised by the PHA?						
Policies that (	Govern Eligibility, Selection, an					
	lements been s and Strateg Policies that If-Sufficiency n. dification	lements been revised by the PHA? s and Strategy for Addressing Housing Needs Policies that Govern Eligibility, Selection, an  If-Sufficiency Programs. n. dification	lements been revised by the PHA? s and Strategy for Addressing Housing Needs Policies that Govern Eligibility, Selection, and Admissions.	lements been revised by the PHA? s and Strategy for Addressing Housing Needs Policies that Govern Eligibility, Selection, and Admissions.		

As part of the Rental Assistance Demonstration (RAD), <u>CKHA</u> is redefining the definition of a substantial deviation f the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project BasedVoucher Assistance.
- **b.** Changes to the Capital Fund Budget produced because of each approved RADConversion, regardless of whether the proposed conversion will include use of additional Capital Funds.
- c. Changes to the construction and rehabilitation plan for each approved RADconversion; and
- d. Changes to the financing structure for each approved RAD conversion.

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

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

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

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

CKHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements:

- 1. Developments operated by a PHA with fewer than 100 public housing units.
- 2. Mixed population or developments designated specifically for elderly or disabled families.
- 3. Developments operated by a PHA with only one general occupancy development.
- 4. Developments approved for demolition or for conversion to tenant-based public housing; and
- 5. Developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

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

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

CKHA 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).

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

	Depending on local circumstances CKHA's deconcentration policy may include, but is not limited to the following:				
	• Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities.				
	• Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments.				
	• Establishing a preference for admission of working families in developments below the EIR				
	• Skipping a family on the waiting list to reach another family to further the goals of deconcentration.				
	• Providing other strategies permitted by statute and determined by CKHA 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 CKHA's deconcentration policy. CKHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under CKHA's deconcentration policy [24 CFR 903.2(c)(4)].				
	If, at annual review, the average incomes at all general occupancy developments are within the EIR, CKHA will follow the deconcentration requirement, and no further action is required.				
	Attachment A is provided which reflects twelve (12) family developments, only one of which is subject to the Deconcentration Policy as per HUD Notice PIH 2001-4 (HA) dated January 19, 2001. As permitted by Notice PIH 2001-4, a bedroom adjustment factor was utilized to provide for a unit-weighted average of the unit distribution at each development and for the total average. Notice PIH 2001-4 also prescribes an Established Income Range of 85% to 115% for each development when compared to the project-wide average. Per CFR 903.2(b)(2)(i) public housing developments operated by a PHA with fewer than 100 units are not subject to deconcentration of poverty and income mixing requirements. Therefore, only Orchard Manor is subject to the requirements.				
	30% of the Area Median Income of \$61,100 is \$18,330 (effective 4/1/2021). Based upon Federal Register dated 08/06/02 "Public Housing Agency Plans: Deconcentration – Amendments to Established Income Range Definition; Final Rule", HUD agrees that in all practicality deconcentration would not be fostered through efforts to place lower income families in developments categorized as higher income in which the average family income is in fact at the extremely low-income level. Therefore, since the average income for all family developments is less than the Extremely Low-Income Limit, the deconcentration requirement does not apply.				
	See Attachment A for a complete calculation of the percentages.				
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?				
	<ul> <li>☐ ☑ Hope VI or Choice Neighborhoods.</li> <li>☑ ☐ Mixed Finance Modernization or Development.</li> </ul>				
	<ul> <li>□ Index In</li></ul>				
	Conversion of Public Housing to Tenant-Based Assistance.				
	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.				
	<ul> <li>□ ⊠ Occupancy by Police Officers.</li> <li>□ ⊠ Non-Smoking Policies.</li> </ul>				
	Project-Based Vouchers.				
	<ul> <li>☐ Units with Approved Vacancies for Modernization.</li> <li>☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</li> </ul>				
	(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				
	CKHA may seek mixed-finance investment in the form of Low-Income Housing Tax Credits for the rehabilitation of existing public housing or project-based voucher developments as part of a plans to rehabilitate or redevelop properties including repositioning of properties using RAD or Section 18.				
	Will use replacement housing funding, please refer to Replacement Housing Plan <i>as per Attachment D</i> , to acquire existing properties in the agency's operating jurisdiction to rehabilitate and increase the availability of assisted housing.				

	Demolition/Disposition Activity Description
	1a. Development name: Scattered Site Units         1b. Development (project) number: WV001001007
	2. Activity type: Demolition Disposition Disposition
	3. Application status (select one) Approved Submitted, pending approval Planned application
	4. Date application approved, submitted, or planned for submission: To be determined
	5. Number of units affected: 17 – properties with 4 or less units.
	<ul> <li>6. Coverage of action (select one)</li> <li>☑ Part of the development</li> <li>☑ Total development</li> </ul>
	<ul> <li>7. Timeline for activity:</li> <li>a. Actual or projected start date of activity: Submit application in 4<sup>th</sup> quarter of 2023.</li> <li>b. Projected end date of activity: Estimated completion is 4<sup>th</sup> quarter 2024</li> </ul>
	Conversion of Public Housing through Rental Assistance Demonstration (RAD) and/or Section 18 Disposition As Congress has expanded the number of public housing units nationwide available to be converted to RAD funding (450,000) CKHA will file an
	application to convert existing public housing properties to Section 8 Project-Based Vouchers using the RAD/Section 18 Construction Blend. Specifically, CKHA plans to redevelop multiple sites together including Orchard Manor (150 units), Orchard Elderly CRHLP 4 (12 units), Hutchinson Street CRLHP 2 (22 Units), and CRHLP 1 (44 units). See <i>Attachment R</i> for details.
	Project-Based Vouchers
	The use of Project Based voucher assistance is consistent with CKHA's Annual Plan to increase the availability of quality affordable housing, revitalize and diversify neighborhoods and to provide desired housing that meets local demographics. CKHA may opt to issue an RFP for up to 20% of the current voucher allocation to potentially being used for project-based vouchers.
	CKHA will be project-basing tenant protection vouchers awarded in connection with the Section 18 Disposition of the Scattered Sites and as part of the RAD/Section 18 Blend to redevelop Orchard Manor as outlined in <i>Attachment R</i> .
	Units with Approved Vacancies
	CKHA will seek approval for unit status changes in vacancies resulting from remediation of units due to contamination from methamphetamine production/usage above state limits.
	CKHA will also seek approval from HUD to place vacant units in properties being rehabbed or redeveloped as part of public housing repositioning in Modernization Status to facilitate relocation.
	Other Capital Grant Programs
	CKHA will apply for the Capital Grant Safety and Security Funding Opportunity.
р 2	Progress Report.
B.3	Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.
	CKHA's mission is to provide every resident with a decent, safe, affordable place to live, while linking or providing programs that will assist them on their journey to self-sufficiency. The primary goals of the 5- Year Plan include maintaining, improving, and expanding affordable housing in our operating area, developing additional services/partner with agencies to serve our residents, building a diversified business model for the agency, promoting the opportunities and successes of affordable housing, and strengthening organizational operations.
	CKHA made progress during this period in meeting these goals through preparation and initial implementation of the Moving to Work (MTW) program Tiered Rent demonstration study and continuing to explore all opportunities as an MTW designated agency through eligible waivers that allow for maintaining, improving, and expanding affordable housing in our area. There were seven Family Self-Sufficiency (FSS) program graduates with an escrow release of \$12,089.61. In addition to working closely with partner agencies to provide resources for FSS participants, CKHA applied and was awarded \$125,685.00 in grant funding. These awarded grant funds have been used to fund senior services, summer nutrition programs, an essentials pantry at two sites, funding for AmeriCorps staff and computer hardware, and basketball court upgrades. Two

	applications are pending, for Safety & Security and FSS funding. CKHA has completed modernization of four floors at Jarrett Terrace. CKHA has developed a philosophy of agency compensation and benefits to maintain competitive wages with market peers to attract and retain qualified staff.				
B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.				
	See Capital Fund 5 Year Action Plan for 2021 – 2025 in EPIC approved by HUD on 07/06/2022.				
B.5	Most Recent Fiscal Year Audit.				
	(a) Were there any findings in the most recent FY Audit?				
	Y N				
	(b) If yes, please describe:				
C.	Other Document and/or Certification Requirements.				
C.1	Resident Advisory Board (RAB) Comments.				
	(a) Did the RAB(s) have comments to the PHA Plan?				
	Y N I II				
	(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.				
C.2	Certification by State or Local Officials.				
	Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.				
С.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.				
	Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.				
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.				
	(a) Did the public challenge any elements of the Plan?				
	$ \stackrel{\rm Y}{\boxtimes} \stackrel{\rm N}{\Box} $				
	If yes, include Challenged Elements.				
	While there were no challenged elements specific to the 2023 CKHA Annual Agency Plan, there were a few areas of general concern related to planning/policies/improvements that were raised, both in comment sheets obtained from residents and in the Annual Agency Plan (AAP) Meetings. These included: applications, safety/security, communication, and pets.				
C.5	<ul> <li>Troubled PHA.</li> <li>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</li> <li>Y N N/A</li> <li>□ □ ⊠</li> </ul>				
	(b) If yes, please describe: N/A				

D.       Affirmatively Furthering Fair Housing (AFFH).         D.1       Affirmatively Furthering Fair Housing (AFFH).         Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as mecssary to overcome fair housing issues and contributing factors). Unit such time as the PHA is strategiated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal		
Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfil, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal	D.	Affirmatively Furthering Fair Housing (AFFH).
	D.1	Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 51.54(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfil, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal         Fair Housing Goal:       Describe fair housing strategies and actions to achieve the goal