

MINUTES OF A REGULAR MEETING OF THE
 COMMISSIONERS OF THE
 CITY OF ROANOKE REDEVELOPMENT AND HOUSING AUTHORITY

The Commissioners of the City of Roanoke Redevelopment and Housing Authority met for a regular session on Monday, November 27, 2017, in the offices of the City of Roanoke Redevelopment and Housing Authority, 2624 Salem Turnpike, NW, in the City of Roanoke, Virginia.

I. CALL TO ORDER – ROLL CALL

Chair Burruss called the meeting to order at 3:03 p.m. and declared that a quorum was present.

PRESENT:	Commissioners Anguiano, Karnes, Smith, Witten, Garner and Burruss
ABSENT:	Commissioner Butler
OFFICER PRESENT:	Mrs. Glenda Edwards Goh, Secretary-Treasurer
ALSO PRESENT:	Jackie Austin, VP of Finance/CFO; Kathy Beveridge, Housing Choice Voucher Director; David Bustamante, VP of Housing; Stephanie Cooperstein, Section 3 Coordinator; Betsy Crow, VP of HR and Administration; Frederick Gusler, Director of Redevelopment and Revitalization; Crystal Hall, Community Support Services Director; Mark Loftis, Legal Counsel; Joel Shank, VP of Operations; Brian Townsend, Assistant City Manager; Mikesha Mayo, Service Coordinator; Dezaray Allaire, Executive Assistant

Chair Burruss welcomed everyone to today's meeting.

II. REPORTS

1. Financial Report

Chair Burruss asked if there were any comments or questions.

Referring to changes in the Central Office Balance sheet on page 12, Vice-Chair Garner inquired about the increase in Cash – unrestricted under Assets and the decrease in Retained Earnings – under Equity. He specifically asked what accounted for the big change in the Cash – unrestricted amount under Assets. Mrs. Austin clarified that she would review the detail and e-mail the information to Commissioners.

Commissioner Anguiano inquired about the Retained Earnings in the General Balance sheet decreasing roughly \$500,000. Mrs. Austin explained there were big changes with Governmental Accounting Standards Board (GASB) 68 that affected the bottom line to a lot of RRHA programs. She explained it had a lot to do with changed requirements relative to accounting for retirement.

Responding to a question from Vice-Chair Garner about the statement in the Executive Director's Report, regarding certain report information not being available due to new software implementation, Mrs. Goh clarified this did not relate to Finance; however, there were some issues with Finance modules that are being resolved. She stated that, although those issues should not affect the balances, it is possible that this could cause some discrepancy in the reports. Mrs. Austin stated that this is one of the reasons she has focused on working through the problems in order to get them resolved.

Chair Burruss welcomed Mikesha Mayo to the meeting.

2. Executive Director's Report

Chair Burruss asked for the Executive Director's report.

Mrs. Goh stated that the House accepted the Senate's Budget Bill in order to

move on to Tax reform. She explained that because they have not begun to finalize individual budget bills, she has no updated information regarding RRHA's final funding.

Mrs. Goh informed the Board that the Choice Neighborhoods Implementation Grant application was submitted by the deadline of November 22, 2017, and it will be several months before a response is anticipated.

Mrs. Goh informed the Board that Real Estate Assessment Center (REAC) inspection scores have been released for Melrose Towers and Morningside Manor. Mrs. Goh went on to say that both sites scored 91 with no health or safety violations at either site, which means that it will be three years until the next required inspection for these sites. Chair Burruss commended Mrs. Goh and Mr. Bustamante.

Mrs. Goh shared with the Board that U.S. Department of Housing and Urban Development (HUD) approved funds in the amount of \$533,621 for RRHA to cover the shortfall in the Housing Choice Voucher (HCV) program. HUD will provide additional funds, should RRHA need them, to cover Housing Assistance Payments through the end of the calendar year. Mrs. Goh stated that RRHA staff was very appreciative that this year's process was much smoother than previous shortfall experiences.

Mrs. Goh referred to the draft schedule of 2018 Board meeting dates which was included with Board materials and noted that the list reflects meeting dates in accordance with the Bylaws. She stated that the Bylaws allow for meetings to be scheduled on different dates and times established by resolution of the Board of Commissioners.

Mrs. Goh noted that she sent the draft schedule to Commissioners by email prior to the meeting, and Commissioner Witten had suggested that the meeting in December

be moved to December 17, 2018, the third Monday of the month to accommodate people traveling during the holidays. After discussion, Board members agreed that the meeting date should be changed to Monday, December 17, 2018. Mrs. Goh informed the Board that having the meeting a week earlier might mean later delivery of board materials because staff cannot begin working on the Monthly Operations Report until the first of the month.

Vice-Chair Garner observed that the May meeting would be on Tuesday after the Memorial Day holiday, and Mrs. Goh stated that, in cases where the meeting date coincides with a holiday observed by RRHA, the Bylaws state that the meeting will be scheduled for the next business day after the holiday. After discussion, Board members agreed that the meeting date should be changed to Monday, May 21, 2018.

Mrs. Goh pointed out that the National Association of Housing and Development Officials (NAHRO) Legislative Conference in Washington, D.C. scheduled for April 22, 2018 through April 24, 2018 conflicts with the April 2018 meeting date, which at least one Commissioner usually attends. After discussion, Board members agreed that the meeting date should be changed to Monday, April 30, 2018. Mrs. Goh stated that she would prepare a resolution for the Board to consider approving the meeting date changes at the December meeting.

Vice-Chair Garner asked if there were any other REAC inspections scheduled. Mr. Bustamante stated that Lansdowne Park and Villages at Lincoln will have inspections in the next few months but dates have not been set. The inspections should be scheduled for late January or early February.

Commissioner Anguiano thanked Mrs. Goh for adding the prior year comparison

data to the public housing crime report. Mrs. Goh explained that when RRHA gets to the final phase of the new software implementation and has access to the Executive Dashboard feature, which has not yet been installed, it should be possible to create user generated reports and present data in different ways. Commissioner Anguiano stated that it would be good to see raw crime data on the same report; however, he acknowledged that the report already contains a lot of information. Mrs. Goh asked if there was anything on that report that Commissioners preferred not to see, which might be removed and replaced by raw data. Commissioner Anguiano stated he would give that some thought. Mrs. Goh indicated staff will work on finding a way to get the raw data on there without making it any more difficult to read.

3. Staff Reports

Chair Burruss asked if there were any staff reports. There were none.

4. Committee Reports

Chair Burruss asked if there were any committee reports.

Commissioner Anguiano reported that the Legislative Committee had met earlier and a rough draft for the first communication that they want to send out to representatives is almost complete and a timeline for quarterly communications was discussed. Commissioner Anguiano went on to say that the committee's plan is to get Board approval before proceeding with communications with legislators.

5. Commissioner Comments

Chair Burruss asked if there were any Commissioner comments. There were none.

6. City Council Liaison Comments or Discussions

Chair Burruss stated that Council Member Garland was not present today.

7. Residents or other community members to address the Board

Chair Burruss indicated that there were no residents or community members present.

III. CONSENT AGENDA

C-1 Minutes of the Special Meeting of the Board of Commissioners held Wednesday, November 1, 2017.

RECOMMENDED ACTION: Dispense with the reading thereof and approve as recorded.

C-2 Monthly Operations Report for the month of October 2017.

RECOMMENDED ACTION: File as submitted

Vice-Chair Garner introduced a motion to approve the Consent Agenda. The motion was seconded by Commissioner Smith and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

Chair Burruss thereupon declared said motion carried as introduced.

IV. REGULAR AGENDA

1. Resolution No. 3941

Ms. Crow introduced Resolution No. 3941, requesting the Board's approval of revised Personnel Policies regarding Employee Assistance Program (EAP), Retirement Savings Plans, Employee Referral Program, Voluntary and Involuntary

Deductions from Pay, and Annual Performance Appraisals. She explained that RRHA regularly reviews employee policies and stated that the EAP, Retirement Savings Plans, Employee Referral Program and the Annual Performance Appraisals were updated in terms of discrepancies with other policies and a general review of those policies. She went on to say that the policy with the major change was policy No. 409, titled Garnishment of Employee Wages that was updated to include all voluntary and involuntary deductions from pay according to State and Federal Law.

Commissioner Witten wanted to confirm that, with the delegation statement added, the Board would not need to see the policy again if something like a phone number changed in the procedures. Ms. Crow confirmed that was correct.

Commissioner Witten inquired about the range of inequity that was created with the Employee Referral Program due to monies being grossed up with individuals with different tax burden. Ms. Crown explained that any monies paid to employees are subject to State and Federal taxes. For the Employee Referral Program, it is RRHA's choice to make sure that every employee receives five-hundred dollars after taxes. Mrs. Austin explained that, when RRHA grosses the amount up, RRHA pays the taxes so that the employee's net is \$500. Mrs. Goh explained that RRHA doesn't have that many employees who refer new hires; therefore, RRHA increased the amount of the referral bonus to provide more of an incentive. Commissioner Witten asked how many referrals were paid out last year. Ms. Crow shared that one maintenance employee received five referral payments. Commissioner Witten asked whether the incentive should be higher. Ms. Crow stated that she felt that it was a good amount and wasn't sure that increasing the incentive would make a difference.

Chair Burruss asked about elimination of the \$100 incentive for the Equal Employment Opportunity (EEO) employees. Ms. Crow explained that there used to be an affirmative action plan and an EEO Officer. RRHA still participates in all of the efforts for Equal Employment Opportunity, but is not required by law to submit an affirmative action plan, a fact which was discovered a couple of years ago, because RRHA is a political subdivision,. Ms. Crow stated that, during review of the policy, it was discovered that the \$100 incentive was still in there but is no longer applicable since RRHA does not have to submit an affirmative action plan and the incentive was, therefore, removed.

Chair Burruss asked if there were any other comments or questions. There were none.

Commissioner Smith introduced Resolution No. 3941 and moved its adoption as introduced:

RESOLUTION OF THE CITY OF ROANOKE REDEVELOPMENT AND HOUSING AUTHORITY APPROVING REVISED PERSONNEL POLICIES REGARDING EMPLOYEE ASSISTANCE PROGRAM, RETIREMENT SAVINGS PLANS, EMPLOYEE REFERRAL PROGRAM, VOLUNTARY AND INVOLUNTARY DEDUCTIONS FROM PAY, AND ANNUAL PERFORMANCE APPRAISALS

WHEREAS, the City of Roanoke Redevelopment & Housing Authority (RRHA) has undertaken a review of its personnel policies to ensure they are relevant, meet the needs of the agency and are legally compliant; and

WHEREAS, RRHA has reviewed and is proposing revisions to the following Personnel Policies to better reflect current requirements and practices:

- No. 330, Employee Assistance Program (EAP), dated December 20, 1996, and previously revised September 17, 2001, and July 1, 2011;
- No 360, Retirement Savings Plans, dated December 20, 1996, and previously revised on April 1, 2000, July 1, 2011, and January 1, 2012;
- No. 370, Employee Referral Program, dated March 7, 2005, and previously revised May 1, 2014;

- No. 409, Garnishment of Employee Wages, dated December 20, 1996, and previously revised on January 1, 2013, with title to be changed to Voluntary and Involuntary Deductions from Pay;
- No 610, Annual Performance Appraisals, dated December 20, 1996, and previously revised on October 22, 2012; and

WHEREAS, the Personnel Committee of the RRHA Board of Commissioners supports and recommends approval of these revised policies.

NOW, THEREFORE, BE IT RESOLVED by the Commissioners of the City of Roanoke Redevelopment and Housing Authority that the attached revised Personnel Policies No. 330, Employee Assistance Program; No. 360, Retirement Savings Plans; No. 370, Employee Referral Program; No. 409, Voluntary and Involuntary Deductions from Pay; and No. 610, Annual Performance Appraisals, are approved effective December 1, 2017.

The motion was seconded by Vice-Chair Garner and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

Chair Burruss thereupon declared said motion carried and Resolution No. 3941 adopted as introduced.

2. Resolution No. 3942

Mrs. Beveridge introduced Resolution No. 3942, requesting the Board's approval for submission of the Section 8 Management Assessment Program (SEMAP) Certification to HUD. Mrs. Goh explained that RRHA is required by HUD to evaluate compliance with certain indicators and submit a self-certification. She went on to explain that the SEMAP certification is due within 60 days of the close of RRHA's Fiscal Year every year. The due date is November 29, 2017.

Commissioner Anguiano noticed that RRHA didn't hit the deconcentration bonus and wanted to know if there were any metrics to show if RRHA had improved since

it was done previously. Mrs. Beveridge explained that RRHA has always put Not Applicable (NA) as that indicator is voluntary.

Chair Burruss asked if there were any other comments or questions. There were none.

Commissioner Anguiano introduced Resolution No. 3942 and moved its adoption as introduced:

RESOLUTION OF THE CITY OF ROANOKE REDEVELOPMENT AND HOUSING AUTHORITY AUTHORIZING SUBMISSION OF SECTION 8 MANAGEMENT ASSESSMENT PROGRAM CERTIFICATION TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the City of Roanoke Redevelopment and Housing Authority (RRHA) currently administers two thousand sixty-seven (2,067) units of Section 8 Housing; and

WHEREAS, pursuant to 24 Code of Federal Regulations (CFR), Part 985, RRHA is mandated to submit to the U.S. Department of Housing and Urban Development (HUD) a Section 8 Management Assessment Program (SEMAP) Certification concerning its performance in key Section 8 Program areas; and

WHEREAS, the purpose of the Certification is to allow HUD to objectively identify and measure RRHA's compliance with the Section 8 Program requirement, which measure is accomplished through the rating of performance indicators; and

WHEREAS, RRHA is required to submit this SEMAP Certification within sixty (60) days after the end of the fiscal year on September 30, 2017, resulting in a submission deadline of November 29, 2017; and

WHEREAS, the Section 8 staff complies with RRHA's written policies and procedures for the SEMAP performance indicators in the administration of the Section 8 Program. The staff conducts monitoring reviews of the following indicators and certifies to the Board of Commissioners that the information included on the SEMAP certification form is accurate and complete:

1. Selection from the Waiting List
2. Reasonable Rent
3. Determination of Adjusted Income
4. Utility Allowance Schedules
5. Housing Quality Standard (Quality Control Inspection)
6. Housing Quality Standard Enforcement
7. Expanding Housing Opportunities
8. Fair Market Rent Limit and Payment Standard

9. Annual Re-examinations
10. Correct Tenant Rent Calculations
11. Pre-contract Housing Quality Standards Inspections
12. Annual Housing Quality Standard Inspections
13. Lease-up
14. Family self-sufficiency (N/A)

NOW, THEREFORE, BE IT RESOLVED by the Commissioners of the City of Roanoke Redevelopment and Housing Authority that the Executive Director is authorized to submit the Section 8 Management Assessment Program (SEMAP) Certification containing information listed on the attached form to the U.S. Department of Housing and Urban Development.

The motion was seconded by Commissioner Smith and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

3. Resolution No. 3943

Mr. Shank introduced Resolution No. 3943, requesting the Board's approval for awarding a contract for open-ended Architectural and Engineering (A&E) services for multiple projects under the Fiscal Year (FY) 2016 Capital Fund Program No. VA36P01150116. He stated that this is an annual process that will take care of smaller projects that RRHA needs to complete throughout the course of the year. Mr. Shank said that four Statements of Qualifications were received from A&E firms, with LMW, P.C. being the highest ranked from the evaluation process. He stated that the contract period will be for one-year with one option year for the not-to-exceed amount of \$135,000.

Responding to a question from Commissioner Witten about the total points a firm could receive and if any of the firms submitted a Section 3 strategy that would be

beneficial to RRHA residents, Mr. Shank stated that it was 500 total possible points and there were no firms that were Section 3 qualified but some firms provided Section 3 strategies that included opportunities for training.

Chair Burruss asked if there were any other comments or questions. There were none.

Commissioner Garner introduced Resolution No. 3943 and moved its adoption as introduced:

RESOLUTION OF THE CITY OF ROANOKE REDEVELOPMENT AND HOUSING AUTHORITY AWARDDING A CONTRACT FOR ARCHITECTURAL AND ENGINEERING SERVICES FOR MULTIPLE PROJECTS UNDER THE FY 2016 CAPITAL FUND PROGRAM NO. VA36P01150116

WHEREAS, the City of Roanoke of Roanoke Redevelopment and Housing Authority (RRHA) has been awarded a grant from the Department of Housing and Urban Development (HUD) Capital Fund Program (CFP), which is grant number VA36P01150116 (566) in the amount of \$1,996,769.00; and

WHEREAS, Open-End Architectural and Engineering Services for RRHA was included on the Annual Statements detailing the planned use of CFP grant number VA36P01150116, which was approved by the Board of Commissioners under Resolution No. 3882 on May 23, 2016; and

WHEREAS, architectural and engineering services are essential to the overall maintenance and modernization of the public housing developments and provide a vehicle for the timely obligation of available funding; and

WHEREAS, many of RRHA's projects are small in nature, with small attendant Architectural & Engineering fees, generating little interest in the design community on a per project basis; and

WHEREAS, the selected projects typically require a variety of A&E services including initial investigation, design development, production of construction documents, space planning, and evaluation of damage to various building systems; and

WHEREAS, execution of a contract for Architectural and Engineering services for multiple projects best serves RRHA's need to have such services available as needed for this type of small projects; and

WHEREAS, RRHA issued a Request for Qualifications (RFQ) on September 10,

2017, with Statements of Qualifications being due on October 4, 2017; and

WHEREAS, RRHA received four (4) Statements of Qualifications in response to the RFQ from the following companies:

- CHP Design Studio
- LMW, P. C.
- Martin & Co. Architects, Inc.
- Mimar Architects & Engineers, Inc.; and

WHEREAS, the Executive Director assigned an Evaluation Panel comprised of five (5) RRHA staff members; and

WHEREAS, the Evaluation Panel reviewed and evaluated Statements of Qualifications according to the following evaluation criteria, which were published in the RFQ:

- A & E Background Data:
 - A. Statement describing A/E firm including list of staff members and job titles. (3 points)
 - B. Status and nature of projects firm has currently, or soon to be, under contract. (3 points)
 - C. Description of firm's organization and project management methodology. (8 points)
 - D. Description of A&E's CAD capabilities, including equipment and staff experience. (1 points)
- Proposed Project Team:
 - A. Profiles of the professional and technical competence of the principal(s) and proposed design team. Provide profile information on consultants that shall be a part of design team. (12 points)
 - B. Indication of specific team members whose involvement is required concurrently on other projects and the percent of time involved on those projects. Indicate the percent of time that members of the design team will be able to dedicate to RRHA projects. (8 points)
- Project History:
 - A. Description of previous work completed within the past ten years related to the modernization, renovation, and/or repair of public housing or other types of multi-family housing. (10 points)
 - B. Previous experience with development of comprehensive site plans for redevelopment work and providing associated surveying services. (4 points)
 - C. Previous experience with open-end type of work. (3 points)
 - D. Previous experience with City, State or Federal agencies. (3 points)
- Project Performance: Provide a spreadsheet with the following information from previously completed projects. Provide information for three (3) projects with

construction costs less than \$250,000 and three (3) projects with construction costs greater than \$250,000.

- A. Provide one sentence description of each project. (5 points)
 - B. Provide client's pre-design budget amount for each project (5 points)
 - C. Amount of time required from date given by client for notice to proceed with design work until date of completion of design work for each project. (5 points)
 - D. A&E estimated construction cost verses actual construction cost for each project. (5 points)
 - E. A&E estimated construction time schedule verses actual time required for completion of each project. (5 points)
 - F. Number and amount for approved non-owner requested change orders for each project. (5 points)
- Section 3:
 - A. Certified Section 3 Business Concern (8 points)
 - B. Section 3 Strategy (7 points); and

WHEREAS, the Evaluation Panel rating for each A & E firm's Statement of Qualifications based on the published evaluation criteria were as follows:

- CHP Design Studio 411 points
- LMW, P.C. 420 points
- Martin & Co., Architects, Inc. 406 points
- Mimar Architects & Engineers, Inc. 379.5 points; and

WHEREAS, the Evaluation Panel determined that LMW, P.C. was the highest ranked firm. RRHA entered into negotiations for fees for services, and the cost of fees for services negotiated with LMW, P.C. was fair and reasonable, based on comparison to RRHA's independent cost estimate completed prior to the beginning of the procurement process; and

WHEREAS, LMW, P.C. has been found to be capable and in all other respects acceptable to RRHA; and

WHEREAS, the Evaluation Panel recommended to the Executive Director that a contract be awarded to LMW, P.C.;

WHEREAS, the Executive Director has determined that this procurement complies with RRHA's Procurement Policy and that it is in the best interests of RRHA to accept such qualification and execute an appropriate contract.

NOW, THEREFORE, BE IT RESOLVED by the Commissioners of the City of Roanoke Redevelopment and Housing Authority that:

- (1) The Statement of Qualifications submitted by LMW, P.C. be and hereby is accepted;

- (2) The Executive Director be and hereby is authorized and directed to execute form HUD-51915, Model Form of Agreement Between Owner and Design Professional, between Hughes Associates Architects & Engineers and RRHA for a term of one (1) year, with one (1) option year, in the not to exceed amount of \$135,000, including reimbursables, subject to availability of funds.
- (3) The Executive Director be and hereby is authorized to take such other actions as may be necessary to fulfill the intent of this Resolution.

The motion was seconded by Commissioner Witten and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

4. Executive Session

Commissioner Garner moved that the Commissioners enter into Executive Session for the purpose of discussion or consideration of the acquisition of real property for a public purpose, or of the disposition of publicly held real property, where discussion in an open meeting would adversely affect the bargaining position or negotiating strategy of the RRHA in accordance with Virginia Code Section 2.2-3711 (A)(3).

The motion was seconded by Commissioner Witten and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

The Board of Commissioners entered into Executive Session at 3:33 p.m.

The Board reconvened into open session at 4:06 p.m.

Commissioner Smith introduced a motion stating that the members of the Board of Commissioners hereby certify to the best of their knowledge that only public business matters lawfully exempted from open meeting requirements and only such public business matters as were identified in the motion by which the closed meeting was convened were heard, discussed or considered by the Board in the immediately preceding Executive Session.

The motion was second by Commissioner Garner and upon roll call the following vote was recorded:

AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

V. ADJOURNMENT

There being no further business to come before the Board, Commissioner Smith moved that the meeting be adjourned.

The motion was seconded by Vice-Chair Garner and upon roll call the following vote was recorded:

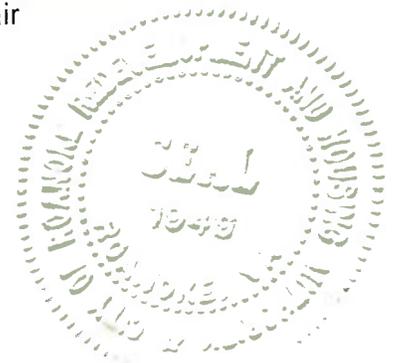
AYES: Commissioners Anguiano, Burruss, Garner, Karnes, Smith, and Witten

NAYS: None

Chair Burruss declared the meeting adjourned at 4:07 p.m.

Gail Burruss, Chair

Glenda Edwards Goh, Secretary-Treasurer



Policy No. 330

~~Date: December 20, 1996~~

~~Revised 9/17/01~~

~~Revised: 05/23/11 — Effective 07/01/11~~

EMPLOYEE ASSISTANCE PROGRAM (EAP)

I. PURPOSE

The Authority offers confidential Employee Assistance Program services as a benefit to assist employees in overcoming personal problems that may tend to adversely affect job performance.

II. SCOPE

This policy applies to all employees or their immediate family members.

III. POLICY

The Employee Assistance Program is designed to provide the company's employees and their families with confidential, professional counseling services to resolve personal and/or family problems through EAP. This program helps employees with problems pertaining to:

Alcoholism	Their Job
Depression	Legal Matters
Drug Abuse	Marriage/Family
Finances	Obesity or Excessive Weight
Gambling	Personal Relationships

[The Board of Commissioners has established this policy and delegates responsibility for establishing or modifying procedures for implementation of the policy to the Executive Director. Current procedures are detailed below.](#)

IV. PROCEDURE

A. Employees or their families may contact ~~these services at:~~

~~Day: (540) 989-6605/ Night: (540) 776-1100~~[the Employee Assistance Program at 1-855-223-9277 or visit \[www.anthemEAP.com\]\(http://www.anthemEAP.com\). For log-in instructions contact Human Resources for an EAP brochure or refer to the HR Index.](#)

B. Referrals. Referrals to EAP counselors may be made on a supervisory or voluntary level:

1. Supervisory. It is the role of the Supervisor to identify and document job performance or attendance problems. Supervisors should not attempt to diagnose problems, but should consider referral of the employee to the EAP and suggest that the employee see a counselor when it is apparent that reasonable supervisory efforts have not resolved the performance problem.

Supervisors may request follow-up from the EAP counselor to determine if the employee has seen a counselor. If job performance does not improve, it is the Supervisor's responsibility to proceed with appropriate

disciplinary action.

2. Voluntary. Employees may voluntarily contact the EAP for help. Employees or their spouses or dependents may contact the EAP counselor directly to make an appointment.

Although voluntary, it is the responsibility of the employee to comply with a supervisor's referral for diagnosis of problems and to cooperate with and follow the recommendations of the EAP counselor. There is no cost to the employee for the EAP counselor's service. Costs for treatment beyond the services of the EAP counselor are the responsibility of the employee.

- C. Confidentiality. Acceptance or refusal of an employee to the EAP program will in no way jeopardize an employee's position with the Authority, nor is a referral considered disciplinary action. The Authority encourages all employees who can benefit from the EAP services to take advantage of such services. Communications between any employee participating in the EAP and any diagnosis shall be confidential.
- D. Personal Time Off may be granted for appointments if appointments cannot be scheduled after work hours.

Original Approval: December 20, 1996
Revised: 9/17/01, 07/01/11, 12/01/2017

Policy No. 360

~~Date: December 20, 1996~~

~~Revised 4/1/00~~

~~Revised: 2/28/11 Effective July 1, 2011~~

~~Revised: 1/1/2012~~

RETIREMENT SAVINGS PLANS

I. PURPOSE

To help eligible employees save for retirement via the Virginia Retirement System's Defined Benefit Plan and a Deferred Benefit Plan.

II. SCOPE

Enrollment in the Virginia Retirement System (VRS) Defined Benefit Plan is required for full time employees. Enrollment in the VRS Deferred Benefit Plan is voluntary for full time and part time employees. Temporary and contract employees are not eligible to participate in either plan.

III. POLICY

Roanoke Redevelopment and Housing Authority participates in the Virginia Retirement System (VRS) and all full-time employees are required to participate by making per pay period contributions. The VRS has several plans (Plan 1, Plan 2, Hybrid) and the type of plan you will enter upon employment is based on your hire date as well as your past participation in the VRS. The Defined Benefit component of this plan provides a lifetime monthly benefit during retirement based on age, total service credit, and average final compensation. This benefit is funded through employee and employer contributions. RRHA makes a contribution to the VRS Defined Benefit Plan each pay period. The contribution is based on an actuarial calculation that is performed every two (2) years. In addition to RRHA's contribution, full time employees are required to contribute 5% of regular earnings to the plan each pay period. For more detailed information on the VRS and a full plan description, visit www.varetire.org.

The Board of Commissioners has established this policy and delegates responsibility for establishing or modifying procedures for implementation of the policy to the Executive Director. Current procedures are detailed below.

IV. PROCEDURE

A. You will be automatically enrolled in the VRS based on your hire date and past participation in the VRS. Employees hired after 2014 will automatically be enrolled in the Hybrid Plan unless they have participated in the VRS prior to employment.

B. Employees will make a mandatory 5% contribution to the plan. Hybrid members will contribute 4% to the Defined Benefit Plan and 1% to the Defined Contribution Plan. All VRS participants may voluntarily contribute to a voluntary 457 Deferred Compensation Plan based on plan rules.

~~Enrollment in the VRS Defined Benefit Plan is required for full time employees. This~~

~~plan provides a lifetime monthly benefit during retirement based on age, total service credit, and average final compensation. This benefit is funded through employee and employer contributions. RRHA makes a contribution to the VRS Defined Benefit Plan each pay period. The contribution is based on an actuarial calculation that is performed every two (2) years. In addition to RRHA's contribution, full time employees are required to contribute 5% of regular earnings to the plan each pay period. For a full plan description, visit www.varetire.org.~~

~~Enrollment in the VRS **Deferred Benefit Plan** is voluntary. This voluntary plan allows you to save for retirement on a tax-deferred basis through convenient payroll deductions over and above the Defined Benefit Plan. The Plan offers a variety of investment options across different asset classes. For more information about the Plan's investment options, visit www.varetire.org and select *Commonwealth of Virginia Deferred Compensation Plan* under the *Defined Contribution Plans* tab~~

~~Original Date Approval: December 20, 1996~~

~~Revised 04/1/2000, 07/01/2011, 01/01/2012, 12/01/2017~~

~~Revised: 2/28/11 — Effective July 1, 2011~~

~~Revised: 1/1/2012~~

Policy No. 370

EMPLOYEE REFERRAL PROGRAM

I. PURPOSE

To provide an incentive to active employees who bring new talent to RRHA by referring qualified job candidates for open positions.

II. SCOPE

This policy applies to all regular employees of RRHA with the exception of the Executive Director, Human Resources Personnel, and managers with hiring authority over the referred candidate. Job candidates are persons not currently employed by RRHA. All regular full time vacancies qualify for referral awards.

III. POLICY

RRHA will provide \$500 payment to a regular employee if he/she refers an applicant who is subsequently hired and successfully completes his/her six (6) month initial employment period. (All monies are grossed up; meaning employees will receive a net payment of \$500.)

~~An additional \$100 referral award may be paid out if the referral, who is hired by RRHA, provides a direct and positive impact to any and all underutilization goals as set by the EEO Officer.~~

The Board of Commissioners has established this policy and delegates responsibility for establishing or modifying procedures for implementation of the policy to the Executive Director. Current procedures are detailed below.

IV. PROCEDURE

- a. The referral must represent the candidate's first contact with RRHA.
- b. Only candidates referred from external sources qualify for payment.
- c. Referred candidates cannot be temporary, summer, contract, or former employees of RRHA. Any job that is part of a government grant is subject to the availability of funds for Referral and will be noted on the Job Posting. An Applicant Referral form must be submitted to Human Resources with an employment application or resume' attached.
- d. The application and/or resume' will be so noted and forwarded to the hiring manager to be screened.
- e. Only candidates who meet the essential qualifications for the position will be considered.
- f. At RRHA's discretion, referred candidates may be considered for other positions that are posted and vacant at the time the application is submitted. Job vacancies that are posted at a later date require a new application and candidate referral form.

- g. Retroactive submissions are not eligible. The referring employee must agree to have his/her name used for introduction.
- h. The first employee to refer a candidate will be the only referring employee eligible for payment.
- i. All candidates will be evaluated for employment consistent with RRHA policies and procedures.
- j. All information regarding the hiring decision will remain strictly confidential.
- k. Hired candidate must successfully complete his/her six (6) month initial employment period in order for the referring employee to receive payment.
- l. Both the referring employee and the referred candidate must be actively employed by RRHA in order to receive payment.
- m. Any disputes or interpretations of the program will be handled through Human Resources.
- n. Human Resources will initiate payment of the referral award.
- o. RRHA reserves the right to revise or cancel the Employee Referral Program, in whole or in part, at any time with or without notice.

Original Approval: March 7, 2005

Revised: May 1, 2014

Policy No. 409

~~Date: December 20, 1996~~

~~Revised: January 1, 2013~~

GARNISHMENT OF EMPLOYEE WAGES VOLUNTARY AND INVOLUNTARY PAY DEDUCTIONS FROM PAY

I. PURPOSE

To communicate to employees RRHA's obligations as relates to pay deductions, child support orders and collection proceedings that have been instituted by creditors garnishments.

II. SCOPE

This policy applies to all regular and temporary employees.

III. POLICY

RRHA

RRHA is required by state and federal laws to make certain deductions from an employee's paycheck each pay period. Such deductions typically include federal and state taxes and Social Security. Other deductions are allowed in compliance with state and federal law and include, but are not limited to child support orders, garnishments, and other voluntary deductions as agreed upon and with proper written authorization.

~~will comply with any and all legal requirements that involve a judicial or governmental ordered garnishment of an employee's earnings for debts owed.~~

The Board of Commissioners has established this policy and delegates responsibility for establishing or modifying procedures for implementation of the policy to the Executive Director. Current procedures are detailed below.

IV. PROCEDURE

Garnishments: When a garnishment of an employee's earnings is served, RRHA is required to deduct the specified dollar amount and number of payments as dictated by the legal order served upon the agency or by law.

RRHA will charge the employee the maximum amount of allowable administrative fees for each deduction as dictated by the legal order served upon the agency or by law.

RRHA will not discharge an employee for any one order of a wage garnishment; however, recurrences of such garnishments (with the exception of child support orders) may subject an employee to disciplinary action in accordance with RRHA's Disciplinary Action Policy No. 420.

Reporting Errors and Obtaining More Information

If any employee, exempt or nonexempt, has questions about deductions from his or her pay, believes he or she has been subjected to improper deductions, or believes that the

amount paid does not accurately reflect the employee's total hours worked or salary,
please contact your supervisor or Human Resources

Every report will be fully investigated, and RRHA will provide the employee with
any compensation to which the employee is entitled in a timely fashion.

RRHA complies with all applicable laws, including the Fair Labor Standards Act, and
will not allow any form of retaliation against individuals who make good faith reports of
alleged violations of this policy, or who cooperate in an investigation by RRHA, even if
the reports do not reveal any errors or wrongdoing.

Original ~~Date~~ Approval: December 20, 1996

Revised: 01/01/2013, 12/01/2017 ~~January 1, 2013~~

ANNUAL PERFORMANCE APPRAISALS

I. PURPOSE

To provide a formal and uniform review system by which the job performance and work related conduct of regular employees is appraised for purposes of assessing the level of performance effectiveness, providing performance feedback, providing for the development of goals and objectives for future growth, and to provide a fair basis for awarding compensation based on merit.

II. SCOPE

This policy applies to all regular employees.

III. POLICY

Formal performance appraisals are completed on an annual basis. The process begins in December of each year covering an individual's performance results of the full calendar year.

The employee performance appraisal process will be managed to accomplish the following objectives:

- a. To document the employee's performance results in all principal duties assigned and work related conduct.
- b. To develop a shared understanding of the employee's level of performance and to establish performance goals and plans to correct performance deficiencies
- c. To develop a shared understanding of the employee's job growth and to establish performance goals and plans designed to improve, sustain, or increase the employee's effectiveness.
- d. To develop a shared understanding of the employee's career path and to establish performance goals and plans to develop employee's overall career goals
- e. To summarize both formal and informal performance discussions held with employees throughout the review period
- f. To ensure effective business operations
- g. To link employee performance with merit increase considerations

Merit increases are not guaranteed and are based upon an employee's overall performance rating and the agency's approved merit budget.

An employee may only grieve an annual performance evaluation if the employee believes that the evaluation is arbitrary or capricious in nature and results in a negative impact to an employee's job status, compensation, benefits, or other legal right. (See Policy 1000 – Grievance Procedures):-

The Board of Commissioners has established this policy and delegates responsibility for establishing or modifying procedures for implementation of the policy to the Executive Director. Current procedures are detailed below.

IV. PROCEDURE

Supervisors are responsible for setting and communicating clear performance expectations for their employees at the beginning of, and throughout, the review period.

Supervisors are responsible for observing and discussing the positive and negative aspects of their employee's job performance and work related conduct in relation to the

established expectations for the review period. Supervisors will conduct an ongoing review of the expectations throughout the course of the year.

Supervisors are responsible for conducting formal annual performance appraisals on their employees in February of each calendar year documenting their job performance and work related conduct results in the previous calendar year.

Supervisors will use first-hand knowledge of the employee's performance, as well as input from others who have directly observed the employee's performance and/or are the direct recipients of an employee's work results or interaction. Employees are encouraged to provide a self-evaluation of performance to their supervisor at calendar year end.

On or about December 1st of each calendar year, Human Resources will provide supervisors a timeline for the completion performance appraisals.

Supervisors will recognize that annual performance appraisals are an important management function; therefore, they will submit draft appraisals for review and approval timely in order for presentations with employee's to occur on schedule.

Prior to presentation, all annual performance appraisals must be reviewed and approved by the next level manager and then are forwarded to Human Resources for final review. After review by Human Resources, the appraisal is returned to the Supervisor. The supervisor will then schedule a time to meet with the employee for presentation. The meeting should be held at a prearranged time in a private location free from interruptions.

Supervisors will present the appraisal and hold a face-to-face individual discussion with the employee regarding its contents. Employees are welcome to comment on their appraisal during the presentation and/or in written form. Written comments must be received by the Supervisor within three (3) working days of the presentation. If a merit increase is warranted and provided for in the budget, the Supervisor will generally announce the increase during the appraisal meeting. If a merit increase is given, it is generally applied to the first paycheck in March; however, the increase may become effective at a later date depending on budget limitations.

Employees will be asked to sign the appraisal as acknowledgement that they have read the appraisal and that the appraisal was reviewed with them. Signature on the appraisal is not an indicator of agreement with its comments or rating.

If an employee declines to sign the appraisal, the Supervisor will write "employee declined to sign" at the bottom of the appraisal and will initial and date before giving the employee a copy of the appraisal.

Supervisors will develop a performance ~~improvement plan~~ for ~~any employee who receives an Overall Performance Evaluation Score of "less than expected" any competency rated as "below expectations"~~. Employees with an overall rating of "below expectations" will receive a performance improvement plan with clear deadlines and dates to improve their performance. —Although it is not necessary that the performance improvement plan follow a specific format, it must address each principal duty of the employee's that falls short of Meets Expectations, provide specific information as to what needs to be improved, how the improvement can be accomplished, what action will result if the employee fails to show satisfactory improvement within a stated timeline. The performance improvement plan must also include specific time intervals in which the Supervisor will provide the employee with documented feedback of the employee's progress or lack of up to that point. A Supervisor may recommend disciplinary action up to and including termination at any time during the performance plan timeline if it is noted that an employee is not making satisfactory progress toward improvement.

Completed appraisals will be retained in the employee's personnel file located in the Human Resources department.

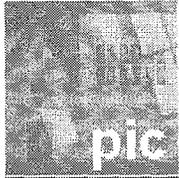
The Executive Director has the authority to approve exceptions to this policy when warranted if it is in the best interest of the agency.

Origination Date: December 20, 1996

| Revised: 10/22/2012, ~~4/21/2017~~ 12/01/2017

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David Bustamante (MMH436)
PIC Main

Assessment Profile | Reports | Submission
List | Summary | Certification | Profile | Comments

Field Office: 3FPH RICHMOND PROGRAM CENTER
Housing Agency: VA011 Roanoke RHA
PHA Fiscal Year End: 9/30/2017

SEMAP
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OMB Approval No. 2577-0215

SEMAP CERTIFICATION (Page 1)

Public reporting burden for this collection of information is estimated to average 12 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. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This collection of information is required by 24 CFR sec 985.101 which requires a Public Housing Agency (PHA) administering a Section 8 tenant-based assistance program to submit an annual SEMAP Certification within 60 days after the end of its fiscal year. The information from the PHA concerns the performance of the PHA and provides assurance that there is no evidence of seriously deficient performance. HUD uses the information and other data to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to the PHA. Responses are mandatory and the information collected does not lend itself to confidentiality.

Check here if the PHA expends less than \$300,000 a year in federal awards

Indicators 1 - 7 will not be rated if the PHA expends less than \$300,000 a year in Federal awards and its Section 8 programs are not audited for compliance with regulations by an independent auditor. A PHA that expends less than \$300,000 in Federal awards in a year must still complete the certification for these indicators.

Performance Indicators

1 Selection from Waiting List (24 CFR 982.54(d)(1) and 982.204(a))

a. The HA has written policies in its administrative plan for selecting applicants from the waiting list.

PHA Response Yes No

b. The PHA's quality control samples of applicants reaching the top of the waiting list and admissions show that at least 98% of the families in the samples were selected from the waiting list for admission in accordance with the PHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection.

PHA Response Yes No

2 Reasonable Rent (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)

a. The PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units (i) at the time of initial leasing, (ii) before any increase in the rent to owner, and (iii) at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary. The PHA's method takes into consideration the location, size, type, quality, and age of the program unit and of similar unassisted units and any amenities, housing services, maintenance or utilities provided by the owners.

PHA Response Yes No

b. The PHA's quality control sample of tenant files for which a determination of reasonable rent was required to show that the PHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable as required for (check one):

PHA Response At least 98% of units sampled 80 to 97% of units sampled
 Less than 80% of units sampled

3 Determination of Adjusted Income (24 CFR part 5, subpart F and 24 CFR 982.516)

The PHA's quality control sample of tenant files show that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verified information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the PHA used the appropriate utility allowances for the unit leased in determining the gross rent for (check one):

PHA Response At least 90% of files sampled 80 to 89% of files sampled
 Less than 80% of files sampled

4 Utility Allowance Schedule (24 CFR 982.517)

The PHA maintains an up-to-date utility schedule. The PHA reviewed utility rate data that it obtained within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10% or more in a utility rate since the last time the utility allowance schedule was revised.

PHA Response Yes No

5 HQS Quality Control (24 CFR 982.405(b))

The PHA supervisor (or other qualified person) reinspected a sample of units during the PHA fiscal year, which met the minimum sample size required by HUD (see 24 CFR 985.2), for quality control of HQS inspections. The PHA supervisor's reinspected sample was drawn from recently completed HQS inspections and represents a cross section of neighborhoods and the work of cross section of inspectors.

PHA Response Yes No

6 HQS Enforcement (24 CFR 982.404)

The PHA's quality control sample of case files with failed HQS inspections shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, all other cited HQS deficiencies were corrected within no more than 30 calendar days from the inspection or any PHA-approved extension, or, if HQS deficiencies were not corrected within the required time frame, the PHA stopped housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce the family obligations for (check one):

PHA Response At least 98% of cases sampled Less than 98% of cases sampled

7 Expanding Housing Opportunities.

(24 CFR 982.54(d)(5), 982.153(b)(3) and (b)(4), 982.301(a) and 983.301(b)(4) and (b)(12))

Applies only to PHAs with jurisdiction in metropolitan FMR areas

Check here if not applicable

a. The PHA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration which clearly delineates areas in its jurisdiction that the PHA considers areas of poverty or minority concentration, and which includes actions the PHA will

take to encourage owner participation.

PHA Response Yes No

b. The PHA has documentation that shows that it took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority concentration.

PHA Response Yes No

c. The PHA has prepared maps that show various areas, both within and neighboring its jurisdiction, with housing opportunities outside areas of poverty and minority concentration; the PHA has assembled information about job opportunities, schools and services in these areas; and the PHA uses the maps and related information when briefing voucher holders.

PHA Response Yes No

d. The PHA's information packet for certificate and voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the voucher program, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration.

PHA Response Yes No

e. The PHA's information packet includes an explanation of how portability works and includes a list of neighboring PHAs with the name, address and telephone number of a portability contact person at each.

PHA Response Yes No

f. The PHA has analyzed whether voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, where such difficulties were found, the PHA has considered whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval when necessary.

PHA Response Yes No

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David Bustamante (MMH436) PIC Main

Field Office: 3FPH RICHMOND PROGRAM CENTER
Housing Agency: VA011 Roanoke RHA
PHA Fiscal Year End: 9/30/2017

SEMAP

SEMAP CERTIFICATION (Page 2)

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Performance Indicators

8 Payment Standards(24 CFR 982.503)

The PHA has adopted current payment standards for the voucher program by unit size for each FMR area in the PHA jurisdiction and, if applicable, for each PHA-designated part of an FMR area, which do not exceed 110 percent of the current applicable FMR and which are not less than 90 percent of the current FMR (unless a lower percent is approved by HUD). (24 CFR 982.503)

PHA Response Yes No

FMR Area Name Roanoke

No records have been entered.

Enter current FMRs and payment standards (PS)

0-BR FMR 572 1-BR FMR 692 2-BR FMR 876 3-BR FMR 1196 4-BR FMR 1344
PS 555 PS 671 PS 850 PS 1160 PS 1310

Save Add

If the PHA has jurisdiction in more than one FMR area, and/or if the PHA has established separate payment standards for a PHA-designated part of an FMR area, add similar FMR and payment standard comparisons for each FMR area and designated area.

9 Timely Annual Reexaminations(24 CFR 5.617)

The PHA completes a reexamination for each participating family at least every 12 months.(24 CFR 5.617)

PHA Response Yes No

10 Correct Tenant Rent Calculations(24 CFR 982, Subpart K)

The PHA correctly calculates tenant rent in the rental certificate program and the family rent to owner in the rental voucher program (24 CFR 982,Subpart K)

PHA Response Yes No

11 Pre-Contract HQS Inspections(24 CFR 982.305)

Each newly leased unit passes HQS inspection before the beginning date of the assisted lease and HAP contract.(24 CFR 982.305)

PHA Response Yes No

12 Continuing HQS Inspections(24 CFR 982.405(a))

The PHA inspects each unit under contract as required (24 CFR 982.405(a))

PHA Response Yes No

13 Lease-Up

The PHA executes assistance contracts on behalf of eligible families for the number of units that has been under budget for at least one year. The PHA executes assistance contracts on behalf of eligible families for the number of units that has been under budget for at least one year

PHA Response Yes No

14 Family Self-Sufficiency (24 CFR 984.105 and 984.305)

14a.Family Self-Sufficiency Enrollment. The PHA has enrolled families in FSS as required. Applies only to PHAs required to administer an FSS program.

Check here if not applicable [checked]

a. Number of mandatory FSS slots (Count units funded under the FY 1992 FSS incentive awards and in FY 1993 and later through 10/20/1998. Exclude units funded in connection with Section 8 and Section 23 project-based contract terminations; public housing demolition, disposition and replacement; HUD multifamily property sales; prepaid or terminated mortgages under section 236

or section 221(d)(3); and Section 8 renewal funding. Subtract the number of families that successfully completed their contracts on or after 10/21/1998.)

Or, Number of mandatory FSS slots under HUD-approved exception (If not applicable, leave blank)

b. Number of FSS families currently enrolled

c. Portability: If you are the initial PHA, enter the number of families currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

Percent of FSS slots filled (b+c divided by a) (This is a nonenterable field. The system will calculate the percent when the user saves the page)

14b. Percent of FSS Participants with Escrow Account Balances. The PHA has made progress in supporting family self-sufficiency as measured by the percent of currently enrolled FSS families with escrow account balances.(24 CFR 984.305)

Applies only to PHAs required to administer an FSS program

Check here if not applicable

PHA Response Yes No

Portability: If you are the initial PHA, enter the number of families with FSS escrow accounts currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

15 Deconcentration Bonus

The PHA is submitting with this certification data which show that :

(1) Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA FY;

(2) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last PHA FY is atleast two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY; or

(3) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area over the last two PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last PHA FY.

PHA Response Yes No

Deconcentration Addendum

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